Rialtas na hÉireann
Government of Ireland

Executive Summary: The Water Action Plan 2024

A River Basin Management Plan for Ireland



Prepared by the Department of Housing, Local Government and Heritage

www.gov.ie/RBMP

Water quality is vital to the well-being of our society, economy and environment, particularly as our rivers and lakes are the sources of our drinking water. They are not only essential parts of our natural environment but also a treasured national asset that is the foundation for making our country a green and fertile land. By protecting our water quality, we will also help to protect public health. By improving our aquatic environment, we will help to sustain jobs in water-intensive sectors, such as agri-food and tourism, sectors that collectively sustain over 200,000 jobs. By preserving these waters, we will preserve our natural heritage for future generations.

The Water Action Plan 2024: A River Basin Management Plan for Ireland outlines the new approach that Ireland will take as it works to protect and restore its rivers, lakes, estuaries and coastal waters over the third-cycle of the EU Water Framework Directive (WFD). Building on the lessons learned from the previous River Basin Management Plans, the approach under this Plan is to place Integrated Catchment Management at its centre. The new Plan uses a much-improved evidence base built upon the assessment of the two previous cycles, to underpin decision-making, at both national and local levels. This Plan will expand and build upon the lessons learned to form a stronger and more integrated approach to public consultation and engagement. The Government is introducing new initiatives and policies to address many of our water-quality challenges. The new Plan builds on the measures implemented during the first and second plans, and is not only a significant national commitment under the Programme for Government, but also on the international sphere by showing our commitment to the implementation of the United Nations Sustainable Development Goal 6 to improve water quality, protect and restore water-related ecosystems.

With effective implementation of the Plan, Ireland can expect to see actions to improve water quality in our water bodies. Changes in agricultural approaches and an increase in urban wastewater treatment will lead to reduced pollution pressures. The new structures and outcomes-based approach, combined with the development of capabilities and expertise, will lay the foundations for consistent progress to be made in addressing a long-term challenge faced by many developed economies.

Consequently, the Plan has placed a major emphasis on establishing the “right measure in the right place” through an effective catchment-based approach. Clear priorities are set out in the Plan, which will ensure that all stakeholders are working together with a strong focus on delivering positive outcomes.

Governance structures will be further developed and improved to facilitate any changes in direction to meet the challenges of improving our water quality. National authorities retain responsibility for the implementation of national programmes, with regional structures driving the implementation of prioritised supporting measures. Meaningful stakeholder and public engagement will be a significant feature of the Catchment Management Work Plans being established by The Local Authority Waters Programme (LAWPRO), which will facilitate public and stakeholder engagement in water policy down to a community level. This engagement will still be supported through the catchments.ie and lawaters.ie websites — and by a wide range of other activities aimed at facilitating and encouraging engagement, while the introduction of a dedicated national campaign website will ensure that the transparent communication surrounding the Plan will reach a national and international audience.

Some of the most significant developments under this Plan include continued investment in wastewater infrastructure of over €2.3 billion over the period 2020 – 2024 by Uisce Éireann, including 108 wastewater treatment plants and 77 collection networks at an estimated cost of €1.5 billion, and 92 national programmes at an estimated cost of €780 million. New agri-environmental schemes under the CAP Strategic Plan (2023-2027) will invest €2.9 billion in environmental protection measures, also a Water European Innovation Partnership (EIP) project, with an investment of €60 million, has been specifically designed to implement water protection measures on 15,000 farms, while pressures on hydromorphology will be addressed through the establishment of a new national restoration programme to mitigate the negative impact of historical water barriers and improve the natural flow of our water bodies.

This Plan’s objectives are ambitious, which is reflected both in the level of commitment to and investment in existing measures and in the expectation that

supporting measures will be implemented to improve approximately 800 water bodies over the period of this cycle. This will result in significant improvements for approximately 150 - 300 water bodies to reach their status objectives, while a further 500 – 650 water bodies will have targeted measures at water body level which will result in improvements in specific water quality elements (e.g. reductions in pollutant levels). Combined with improved implementation and engagement structures, this should see progress in making water-quality improvements and in building capabilities, knowledge and expertise for the future.

This Executive Summary outlines the key aspects of the third-cycle River Basin Management Plan (RBMP). It provides:

- A brief introduction and background to the "*Water Action Plan 2024: A River Basin Management Plan for Ireland*.
- Details of the key findings of the most recent water-quality results and of the outcomes of the risk-characterisation process in terms of the share of total water bodies found to be at risk of not meeting the requirements of the Water Framework Directive (WFD).
- Summary information on the significant pressures causing risks to water bodies.
- Details of the environmental objectives of the WFD and of the priorities for the third planning cycle, given the scale of the challenge presented.
- An outline of the key existing and supporting measures (from our full Programme of Measures) aimed at meeting our environmental objectives.
- Descriptions of the Plan's implementation strategy, of the measures we are taking to expand and further develop communication and public and stakeholder engagement, and projected funding for the Programme of Measures.
- A summary of the expected outcomes, based on our proposed measures and implementation plans.

Introduction & Background

The Irish River Basin District (RBD) covers an area of 70,273km^2, with 46 catchment management units — consisting of 583 sub-catchments, with 4,842 water bodies. Key measures introduced in the second-cycle included scheduling improved wastewater treatment with over €1.7 billion being invested by Irish Water (*now Uisce* Éireann) in over 250 wastewater treatment projects between 2017 and 2021, the deployment of 43 local authority investigative assessment personnel to work in the Prioritised Areas for Action, a new collaborative Sustainability and Advisory Support Programme between Government and the dairy industry, consisting of 30 Sustainability Advisors promoting agricultural best practice in 190 Areas for Action, the implementation of a *'Blue Dot Catchments Programme*' for the protection of high status waters, the extension of the grant scheme for the repair, upgrade and replacement of domestic wastewater treatment systems, and the creation of the Community Water Development Fund to support community water initiatives.

The *Water Action Plan 2024: A River Basin Management Plan for Ireland* aims to build on the key lessons from the previous cycles, and the draft River Basin Management Plan public consultation process, and firmly integrate them into its development. These lessons have been considered in preparing the Programme of Measures. These measures address areas such as improved governance and implementation structures and an enhanced public participation element alongside the development of Sectoral Action Work Plans and Catchment Management Work Plans. They also address the significant pressures on our water bodies from the loss of nitrogen and phosphorous from agricultural practices, to the physical impacts (pressures on hydromorphology) from the past construction of weirs and dams, for example. Responses to these impacts include new measures such as a national scale Water European Innovation Partnership (EIP) project to target water pollution mitigation actions and a national restoration programme to mitigate the negative impacts of barriers on rivers.

We have also used three guiding principles in developing this finalised RBMP. Firstly, the development and implementation of this Plan requires effective and efficient national, regional and local structures, from high-level policy direction, oversight of implementation and technical implementation and reporting, down to regional implementation and the public participation structures. Secondly, the targets set in the Plan must be outcomes based and be ambitious but achievable. Thirdly, we must continue to ensure that effective national measures are in place to address pressures throughout our entire River Basin District, ensuring the implementation of "the right measures in the right place".

Water-Quality Status and trends

The Environmental Protection Agency assesses over 4,000 surface water bodies for ecological status and assesses 514 groundwater bodies for groundwater status. This monitoring programme is carried out over a 6-year period, with the most up-to-date information available from the 2016-2021 period.

Overall, 54% of surface waters are in good or high ecological status while the remaining 46% are in unsatisfactory ecological status. For groundwater

bodies, 91% are in good chemical and quantitative status.

A comparison of the changes in surface water status between the 2013-2018 assessment and the 2016-2021 assessment shows that while there have been improvements (443 water bodies) and declines (428 water bodies) in water quality across all classes, there has been little net change in status overall, and a slight net decline in the number of water bodies that are meeting their environmental objectives. Indeed, the percentage of water bodies meeting their environmental objectives has decreased in each subsequent assessment period since the first baseline water status assessment was undertaken in 2007-2009.

Risks to water bodies and the pressures responsible

The outcomes of the latest risk characterisation process by the EPA show that 1,963 out of 4,842 water bodies (41%) are within the '*Not At Risk*' category and meeting their environmental objective of good or high-status, with 1,649 (34%) of water bodies are classed as '*At Risk*' of not meeting their environmental objective of good or high-status, while 1,230 (25%) of water bodies are currently '*In Review*'.

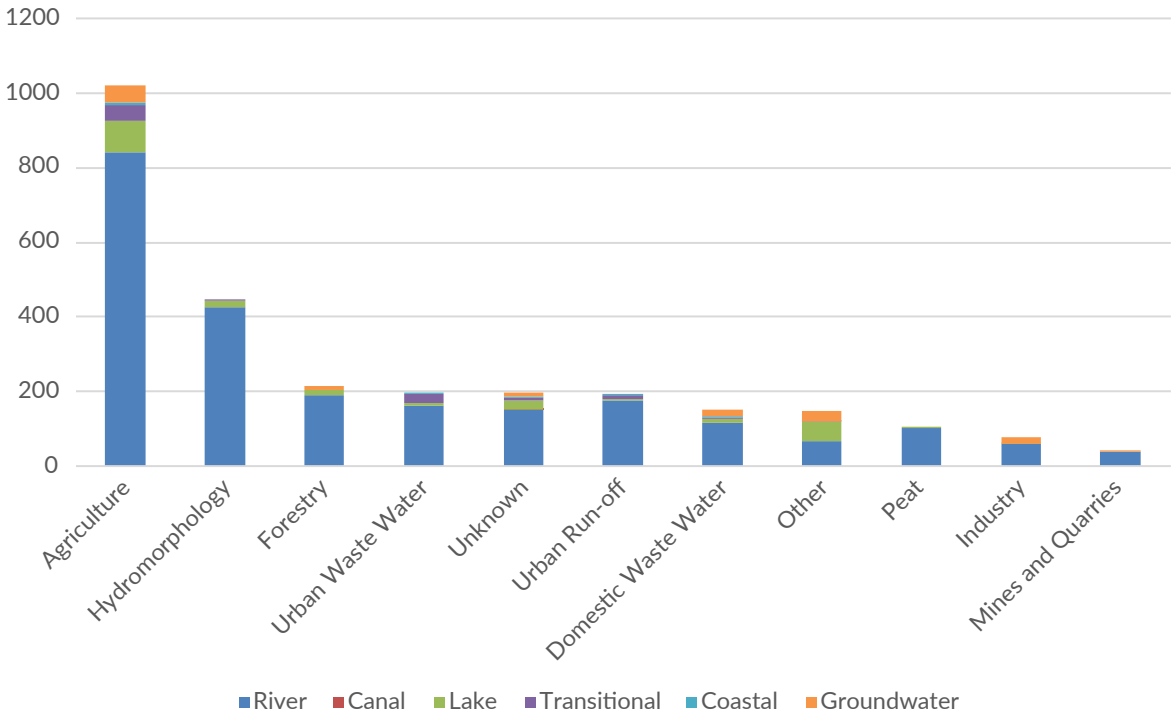
Having identified those water bodies at risk of not meeting their objectives, the characterisation process identifies the significant pressures causing this risk. The significant pressures impacting on the 1,649 water bodies that are at risk of not meeting their objectives include; Agriculture (1,023), Pressures on Hydromorphology (448), Urban Wastewater (197), Forestry (216), Domestic Wastewater (148), Urban Run-off (194) and Peat (106), Extractive Industry (79) and Mines and Quarries (40).

In contrast to the overall national trend, of the 500 river water bodies monitored in the designated Priority Areas for Action (PAAs) during 2019-2021, 314 remained stable with no change in ecological status. A total of 118 river water bodies showed improvements in status, while 68 declined, resulting in a net overall improvement in status class in 50 water bodies in the Priority Areas for Action. The net improvement in river water quality in PAAs is higher than the improvements seen nationally. This may indicate that when targeted action is taken, improvements in water quality can be achieved. Nevertheless, a large number of river water bodies are still declining and unless this is addressed, sustained and progressive improvements in water quality will be difficult to achieve.

Environmental Objectives and Priorities

In broad terms, the objectives of the Water Framework Directive are (i) to prevent the deterioration of water bodies and to protect, enhance and restore them with the aim of achieving at least good status and (ii) to achieve compliance with the water standards and objectives for designated protected areas.

Figure 1: Frequency of significant pressures on at-risk water bodies.



Although the objectives of the Directive clearly set out the end goals, the challenges presented in achieving these objectives are very significant. Therefore, a key purpose of this Plan is to identify priorities and ensure that implementation of the Plan is guided by these priorities. The following evidence-based priorities have been adopted for this river basin planning cycle:

- Ensure full compliance with relevant EU legislation.
- Prevent deterioration.
- Meet the water standards and objectives for designated protected areas.
- Protect high-status waters.
- Implement targeted actions and pilot schemes in focus sub-catchments aimed at (i) targeting water bodies close to meeting their objective and (ii) addressing more complex issues that will build knowledge for future cycles.

Programme of Measures — Summary of Key Measures

Management measures are required to protect and restore natural waters. These measures are many and diverse. They include the implementation of eleven existing EU Directives such as the Nitrates Directive and the Urban Wastewater Treatment Directive. The Water Framework Directive also introduced new mandatory measures, including the control of water abstractions, the control of engineered alterations to natural waters (hydromorphological changes) and the protection of vulnerable catchments from which drinking water is sourced.

With regard to the implementation of regulatory regimes arising out of the existing EU Directives, continual efforts to secure full environmental compliance and to increase enforcement, where necessary, is essential. This is one of the key goals of the proposed 2022-2027 programme of measures. In addition, a number of new management regimes are in the process of being introduced to strengthen controls on water abstractions and engineered alterations to natural waters. The transposition of the new 2020 Drinking Water Directive has also provided the opportunity to implement a more comprehensive and robust approach to drinking water source protection.

In addition to the measures mentioned above a number of 'supplementary measures' have been put in place during the second river basin planning cycle. These were judged to be necessary to drive water quality improvements and protection in a coherent manner following extensive consultations. They included, for instance, new governance and implementation structures (such as LAWPRO and ASSAP), additional water protection measures under CAP, additional investment in public waste water infrastructure and the remediation of domestic waste water treatment systems. The supplementary measures also included further technical research and development to improve our knowledge and understanding of environmental pressures on water and how to address them effectively.

The characterisation process led by the EPA and supported by a broad range of stakeholders is particularly important for identifying the types and location of risk and impacts on waters. The recent technical advances mean that a more comprehensive, robust and streamlined management regime can now be designed and implemented. We have a clearer view of what mitigation measures are required and where those measures need to be implemented locally to improve the status of natural waters, in other words, 'putting the right measure in the right place'. The proposed new and enhanced measures contained in this plan reflect the additional measures considered necessary to deliver the objectives of the WFD in full and to contribute to other environmental priorities including biodiversity and climate mitigation and adaptation. In total, **517** areas have been selected for focused attention in the third-cycle based on risk.

LAWPRO will begin preparing 46 supplementary Catchment Management Work Plans. These will be further supported by the development of Sectoral Action Work Plans including in relation to agricultural, urban wastewater, pressures impacting hydromorphology and forestry pressures. Tracking of implementation, both protection and improvement actions, is central to this framework.

In line with the pressures identified through the characterisation process, and the priorities set out above, the following are the key measures aimed at moving towards meeting the environmental objectives of the WFD:

- The Agricultural Sustainability Support and Advisory Programme (ASSAP) established during the second-cycle has been extended and expanded for the third-cycle. Based on an independent assessment of the ASSAP to date and its recommendations, a major European Innovation Partnership (EIP) project has been established by DAFM and DHLGH to support the targeting of the right measures in the right place. The Water EIP project led by LAWPRO, Teagasc and the dairy industry, is national in scale and is focused on reducing losses of phosphorus, nitrogen, sediment and, where relevant, pesticides to water from agricultural lands by promoting the adoption of innovative best

practice in nutrient management, the application of Nature based Natural Water Retention Measures (NWRM) and other suitable measures. The budget is €60 million (2023-2027).

- The Department of Agriculture, Food and the Marine has collaborated with the Department of Housing, Local Government and Heritage (Water and Heritage Divisions), the EPA and LAWPRO to design schemes under Pillars I and II of the CAP Strategic Plan (2023-2027) which will deliver significant benefits for water protection & restoration and biodiversity, as well as climate mitigation & adaptation.
- Schemes under the new CAP Strategic Plan contributing to improvements in water, biodiversity and climate objectives include the Eco-schemes (€1.4million), the ACRES Co-operation Projects scheme (€740 million) and the ACRES General scheme (€750 million).
- The Fifth Nitrates Action Programme (2022-2025) has been further strengthened. Enforcement will be enhanced to drive greater compliance. Additional farm inspection personnel will be recruited for this purpose.
- Pressures on Hydromorphology has been identified as a significant pressure impacting 448 water bodies at risk of failing to achieve their WFD objectives. They impact by causing damage to natural processes and to the structure and functions of habitats and species, e.g. barriers that impede fish migration, land and channel drainage that alters the physical habitat conditions and the flow conditions. These physical alterations are frequently linked to other significant pressures such as agriculture, forestry, peat extraction, mines and quarries. The following key new measures will be implemented to address existing and future pressures on the physical condition of waters;
  - » A National Restoration Programme is being established to mitigate the negative impact of past construction in or near water bodies. Inland Fisheries Ireland is establishing a newly resourced Barriers Mitigation Division from 2023 under the guidance of the National Hydromorphology Expert Group. The initial focus will be on barriers but will expand to other pressures on hydromorphology. A minimum investment of €110 million is anticipated.
  - » As part of the National Restoration Programme, the roadmap of actions to improve fish migration in the lower Shannon at the Hydroelectric scheme located around Parteen and Ardnacrusha is being progressed. Also, a pilot project is being undertaken for the Annacotty Weir in County Limerick to assist with the design and implementation of the national restoration programme.
  - » Controls on pressures that affect the physical condition of waters need to be strengthened in Ireland. A National Hydromorphology Programme is being established. The Programme will be supported by a Hydromorphology Expert Group and is intended to facilitate the implementation of Water Framework Directive (WFD) objectives relating to the control of pressures on hydromorphology.
- In total 216 water bodies are currently characterised as impacted by pressures from the forestry sector, either solely or alongside pressures from other sectors. These include the physical alteration to habitats, excessive nutrients and sediment and changes in water level and/or flow. Well sited and managed woodlands and forests can play in protecting and enhancing water quality, through the delivery of a range of water-related ecosystem services. Key measures for the third-cycle include;
  - » Continual improvements to the licence applications process for key forestry activities. For example, these include an increase the area of forests with appropriate water setbacks through the ongoing restructuring of existing forest stands at clearfell / reforestation stage.
  - » Promotion of support measures that have a clear role in relation to the protection of water, including: the Continuous Cover Forestry Scheme; the various native woodland and agro-forestry options under the Afforestation Scheme, the Native Woodland Conservation Scheme, and the Reforestation for Climate Resilience Scheme.
  - » Launch of the new Forests for Water scheme with added incentives to promote the creation of new native forests specifically to provide water services, including improvements to water quality, drinking water source protection, natural water retention, the improvement of aquatic and riparian habitats, and the expansion of alluvial woodland.
- Continued investment in wastewater infrastructure with Uisce Éireann investing over €2.3 billion over the period 2020-2024. This includes 108 wastewater treatment plants and 77 collection networks at an estimated cost of €1.5 billion and 92 national programmes at an estimated cost of €780 million. Investment needs beyond this period up to 2027 are currently being assessed and costed.
- A number of initiatives to address **Urban Runoff** will be implemented. These include; an implementation strategy and pilot for nature

based Sustainable Urban Drainage Systems on a national scale, guidance and specialist support, through LAWPRO, to the Local and Planning Authorities on measures to be implemented, research on protecting bathers' health and the preparation of integrated urban drainage management plans.

- In line with the programme for government commitment to 'continue to help fund upgrades to **domestic wastewater treatment systems**, DHLGH will continue to monitor the uptake of the new grant schemes to ensure adequate numbers of people are availing of this measure.
- For the purposes of improving the **protection of shellfish waters**, DHLGH will seek to implement a new legislative and management framework for shellfish waters in Ireland in collaboration with DAFM and other relevant agencies. This will include consideration of monitoring, assessment and protection measures.
- Activities in the area of the restoration and rehabilitation of damaged and degraded peatlands will be accelerated. Examples of key measures include; the National Peatlands Strategy is to be updated into a new Implementation Plan by NPWS. DAFM to oversee the implementation of sustainable management practices developed through peatland EIP projects within the ACRES Agri-environmental schemes. The continuation and expansion of NPWS national programme of peatland restoration on SAC and NHA raised bogs, blanket bogs and fens. Bord na Móna will operate the Enhanced Decommissioning Restoration and Rehabilitation Scheme (EDRRS).

Implementation Strategy

Our implementation strategy focuses on ensuring full implementation of the Programme of Measures over the lifetime of this Plan. The process of selecting the water bodies to be targeted for action through supporting measures was driven at regional and local level through local authority structures. The prioritisation of water bodies has taken place through the five regional committees, each chaired by a local authority Chief Executive. This prioritisation used the EPA catchment assessments as a starting point, with the prioritisation of areas and actions agreed with relevant stakeholders based on wider considerations of impacts and feasibility.

Learning from the lessons of previous cycles, the implementation structures will be re-focused to ensure effective and co-ordinated delivery of the measures. The Water Policy Advisory Committee (WPAC) provides high-level policy direction and oversight of implementation. The National Co-ordination and Management Committee (NCMC) has been set up under the WPAC to ensure that the measures necessary to achieve our objectives are implemented in an efficient, effective and co-ordinated way. The National Technical Implementation Group (NTIG) co-ordinates ongoing detailed tracking of implementation and provides a forum for knowledge sharing. Finally, the regional local authority structures, though the five regional committees, drive delivery of supporting measures at local level. This work is further supported by the Local Authority Waters Programme (LAWPRO) and the Catchment Management Work Plans currently in development. In operating within these structures, all of the bodies associated with this Plan will endeavour to adopt an ethos of actively participating and working together to deliver real action and positive outcomes.

Communication and Public & Stakeholder Engagement

A clear message emerged from the public consultation processes was that the draft River Basin Management Plan lacked ambition and urgency to deal with issues raised. There was also a call for a more streamlined governance structure with clear actions and targeted measures and meaningful public engagement with regard to the implementation of the RBMP.

To help address these concerns a Programme Delivery Office will be created within the Water Division in DHLGH, which will oversee the implementation of the Programme of Measures, and which will allow for more effective communication across the different governance structures. A central aspect of the Programme Delivery Office will be regular reporting on the status of the Plan through regular progress reports. The operations of the Water Policy Advisory Committee (WPAC), the National Coordination Management Committee (NCMC) and the National Technical Implementation Group (NTIG) will be reviewed and re-focused to ensure effective oversight of the implementation of the Plan.

The Local Authority Waters Programme (LAWPRO) will continue to drive public engagement, participation, and consultation with communities and stakeholders at local level through the new public participation fora, and co-ordinate these activities across all 31 Local Authorities.

In addition, the EPA will continue to lead on networking and knowledge sharing. The WFD app and the catchments.ie website both act as information and data repositories and as knowledge-sharing tools to allow better targeting of measures and co-ordination of implementation. These will also be supported by the introduction of a dedicated campaign website, which will act as a central data and information hub on the progress of the Plan.

Funding the Programme of Measures

The projected expenditure for the 3rd cycle RBMP from 2023 to 2027 is a conservative minimum of €716.5million. This is a 137% increase on the estimated expenditure for Cycle 2 (2015-2021). However, this investment may be increased by government as a more precise picture emerges at the local level through the 46 Catchment Management Work Plans regarding the measures needed and as more accurate estimates of the cost of measures are made. This plan commits to review progress with the implementation of measures and to reanalyse the distance to environmental targets. Where additional measures and resources are identified as necessary, these will be considered and addressed. The Cabinet Subcommittee on Environment and Climate Change will work to establish a comprehensive cross government financing and implementation strategy taking account of the national River Basin Management Plan, the National Biodiversity Action Plan, the forthcoming Nature Restoration Law and the Climate Action Plan. This is in line with the ambitious Water, Climate and Biodiversity objectives committed to in the Programme for Government.

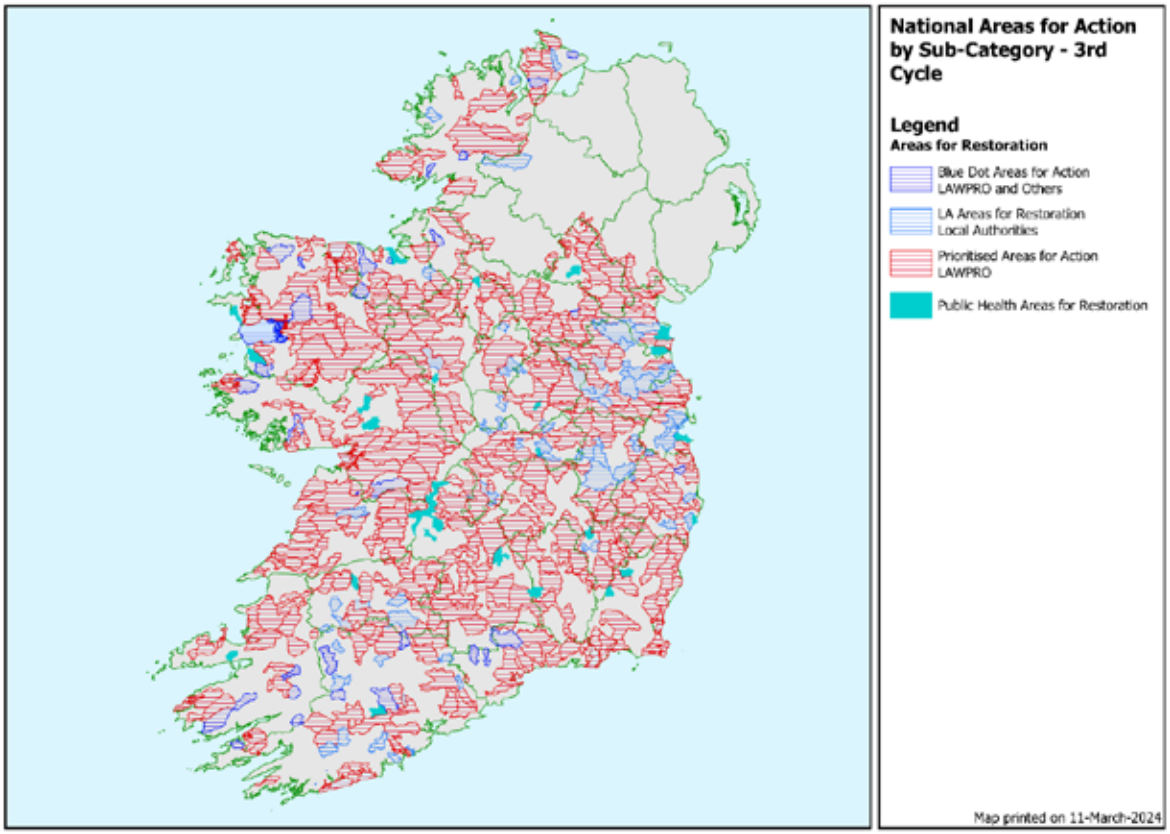
Expected Outcomes

Based on the information set out in the draft plan, it is expected to achieve the following over the period to 2027:

- **46 local Catchment Management Work Plans** will be developed, led by LAWPRO to supplement the national River Basin Management Plan. In addition, several supporting Sectoral Action Work Plans will be developed for several sectors including, Agriculture, Pressures on Hydromorphology, Forestry and Urban Wastewater.
- The **Sectoral Action Work Plan for Agriculture** will include targeted measures to address the 1,000 water bodies at risk from agriculture during the third-cycle, along with protection measures needed to prevent further deterioration.
- The EPA and local authorities will ensure that inspections, follow-up inspections and enforcement actions for agricultural activities will be enhanced with up to **4,500 farm inspections per annum** undertaken during the lifetime of the Nitrates Action Programme.
- The Department of Agriculture Food and the Marine will undertake **500-1,000 inspections per year** under the GAP Regulations focused in Q1 where risk of nutrient impact on water quality is high.
- The aim of the **national agricultural Eco-scheme** under the CAP Strategic Plan is to reward farmers for undertaking actions beneficial to the climate, environment, water quality and biodiversity. It is anticipated that up to **110,000 farmers** will avail of this measure.
- The new national Agri-environmental schemes under the CAP Strategic Plan called ACRES incorporates targeted measures for water protection and restoration. **ACRES Co-operation Projects** (€740 million) are available to **20,000 farmers** in defined high priority geographical areas, including high status objective water bodies. **ACRES General** (€750 million) is available nationally for up to **30,000 farmers** outside of the project areas.
- Recognising that there is a significant proportion of farmers that may be having a significant impact on water quality but do not tend to participate in voluntary Agri-environmental schemes for various reasons the Department of Agriculture, Food and the Marine in collaboration with the Department of Housing, Local Government and Heritage has commissioned a **national large-scale Water EIP** (European Innovation Partnership) project focussed on water to address this gap, thereby supporting the RBMP. The overall value is €60 milllion over five years (2023-2027). The estimated capacity in the scheme is approximately **15,000 farmers**. This large-scale project will be led by LAWPRO, Teagasc and the Dairy Industry working in partnership with a wide range of other stakeholders.
- Approximately 5% (270) of the **2,000-7,000 problem barriers** on rivers will be mitigated as part of the **National Barriers Mitigation Programme**.
- The roadmap of actions to improve fish migration in the Lower River Shannon at the Hydroelectric scheme located at Parteen Basin and Ardnacrusha will be implemented with an initial budget of €10 million. The initial phase will include **the design and construction of a new fish pass at Parteen.**
- Compilation of **actions proposed for the 216 water bodies at risk from Forestry**. These will be reflected in the "Forests and Water: Achieving Objectives under Ireland's River Basin Management Plan 2023-2027" as the **Forestry Sectoral Action Work Plan**.

- During the investment period 2020-2024, Uisce Éireann is **investing in 108 wastewater treatment plants, 77 collection networks and 92 related national programmes at an estimated cost of €2.3bn**. For the third RBMP cycle (2022-2027) new infrastructure projects will be delivered. **139 upgrades to storm water overflows** will be completed.
- **5,800 inspections of Domestic Wastewater Treatment Systems** will be undertaken between 2022 and 2026 under the National Inspection Plan.
- The delivery of **guidance for planning authorities on physical planning and the water framework directive** will contribute to the protection of waters from deterioration arising from inappropriate future development. Supporting technical guidance will also ensure that best environmental practice is applied where alternations to surface waters are undertaken.
- The **Review of Local Authority Resources** will be completed with the aim of putting in place appropriate resources to support individual local authorities in fulfilling their role in water quality protection and restoration.
- **Additional LAWPRO staff** will be put in place to provide further support to the implementation of the RBMP.
- The **Communities Water Development Fund** will be reviewed with the aim of strengthening it.
- In total, **517 Areas for Action** have been selected for focused attention in the third-cycle based on risk. This compares to 190 Areas for Action during the second-cycle (2018–2021). The remaining at risk water bodies which fall outside the 517 Areas for Action will still benefit from existing and newly introduced measures. As resources allow these will be targeted for investigative assessments and further action, where necessary, through the prioritisation processes at regional committee level. (Figure 2.)
- **46 Catchment Community Fora (CCF)** will be established during the lifetime of the 3rd cycle RBMP. Public participation will increase over time beginning with the establishment of Pilot Catchment Community Fora (CCF), with the objective of co-designing a framework, which will trial different engagement methods for the establishment of the fora.
- On the basis of the analysis of the distance to environmental targets, as of September 2023, the EPA has conservatively estimated that out of the approximately **2,200 water bodies** that have not met their objectives, **between 150 and 300 water bodies are likely to improve significantly and achieve their status objectives** as a result of the implementation of the programme of measures contained in this plan. **A further 500-650 water bodies will have targeted measures planned and will see improvements in specific water quality elements (e.g. reductions in pollutant levels)**, even if that is not to the level required to meet the status objectives. **Approximately 850 water bodies are unlikely to have specific, targeted measures at water body level planned and are therefore very unlikely to achieve their status objectives by 2027**. **A further total of 583 water bodies are in *'Review'*, which means additional evidence is required to confirm the nature of any water quality issues and the impacts from any relevant pressures.** The analysis does not forecast which water bodies may decline in quality over the period and no longer meet their objective. However, protection measures are planned, particularly strengthened and targeted regulatory enforcement, which are expected to contribute to protecting at risk water bodies from deterioration. The analysis of the distance to environmental targets will be used by the EPA's Water Programme to track and report the outcomes of the measures and the plan during the 3rd cycle.

Figure 2. Map of third-cycle Areas for Action



www.gov.ie/RBMP

Department of Housing,
Local Government and Heritage

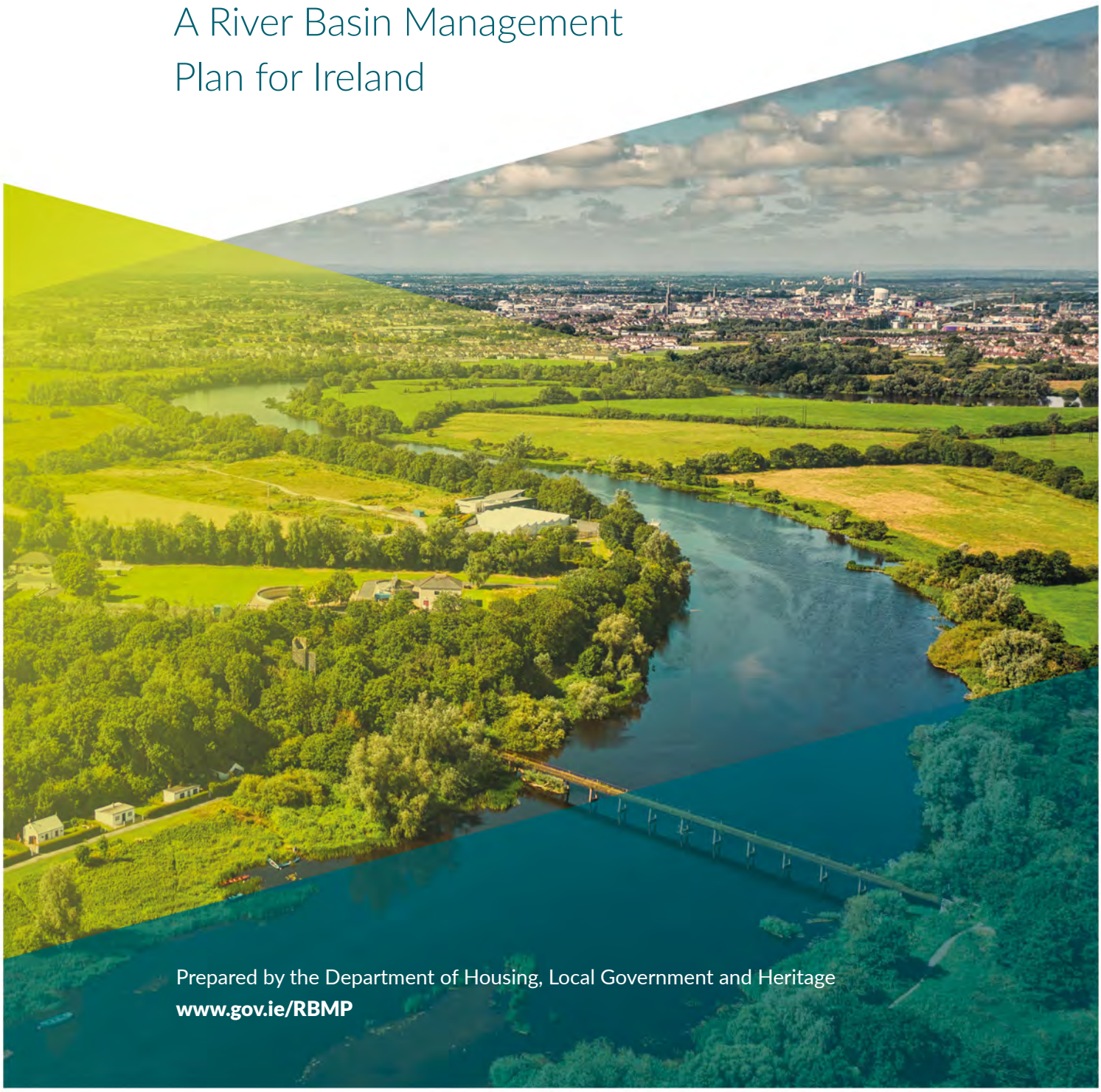


Rialtas na hÉireann
Government of Ireland

Rialtas na hÉireann
Government of Ireland

Water Action Plan 2024

A River Basin Management Plan for Ireland



Prepared by the Department of Housing, Local Government and Heritage

www.gov.ie/RBMP

"Water is not a commercial product like any other but, rather, a heritage which must be protected, defended and treated as such"

EU Water Framework Directive

Foreword

It is now more apparent than ever that global progress on water-related goals and targets remains alarmingly off track. The considerable challenges to ensuring the sustainable use and management of water resources requires a new determination at a global, national and local scale.

Even in Ireland, where our water quality is comparatively good and water is relatively abundant, our natural water systems are at substantial risk from such issues as increasing nutrient pollution, physical modifications, and urban pollution, all while our water systems are becoming more vulnerable due to changing weather patterns.

This Water Action Plan sets out a roadmap to restore Ireland's water bodies to the equivalent of 'good status' or better and to protect water from any further deterioration.

Ireland's water quality has declined in spite of actions taken to date. This decline in water quality is putting Ireland's 'clean and green' image at risk – as well as the livelihoods of farmers and those working in industries such as food and tourism that depend directly on this green image of Ireland.

This plan focuses on protecting and restoring water quality by preventing and reducing pollution, by restoring the natural ecosystem functions of rivers and by continuing to invest in water infrastructure.

New governance structures have improved how we manage water in an integrated way at local and at national level by bringing together all of the key water stakeholders – people living in catchments, environmental NGOs, farmers, implementing bodies, state agencies and departments, and industry. However, even where progress is being made, we must do more to meet the challenge of protecting and improving our water quality. A collaborative effort is the best way to achieve this outcome as the causes and the answers to protecting and restoring our water catchments are not within the grasp of any one group. Everyone needs healthy and well-protected water catchments – for nature, for growing crops, for our industries, for bathing areas, for clean drinking water supply and for effective sanitation.

In the Water Action Plan 2024 the focus will be on implementing actions to protect and improve water bodies. We will achieve this by ensuring that the necessary resources are available but also by having clear accountability that will require each implementing body to deliver on the water action targets in the programme of measures. Each agency and authority will be required to monitor and report publicly on its progress. This plan will help mobilise a joint effort of the State, local authorities, public sector agencies, public and private sector companies, environmental organisations, farm organisations and the people living in each river catchment.



Darragh O'Brien, T.D.

Minister for Housing, Local Government and Heritage



Malcolm Noonan, T.D.

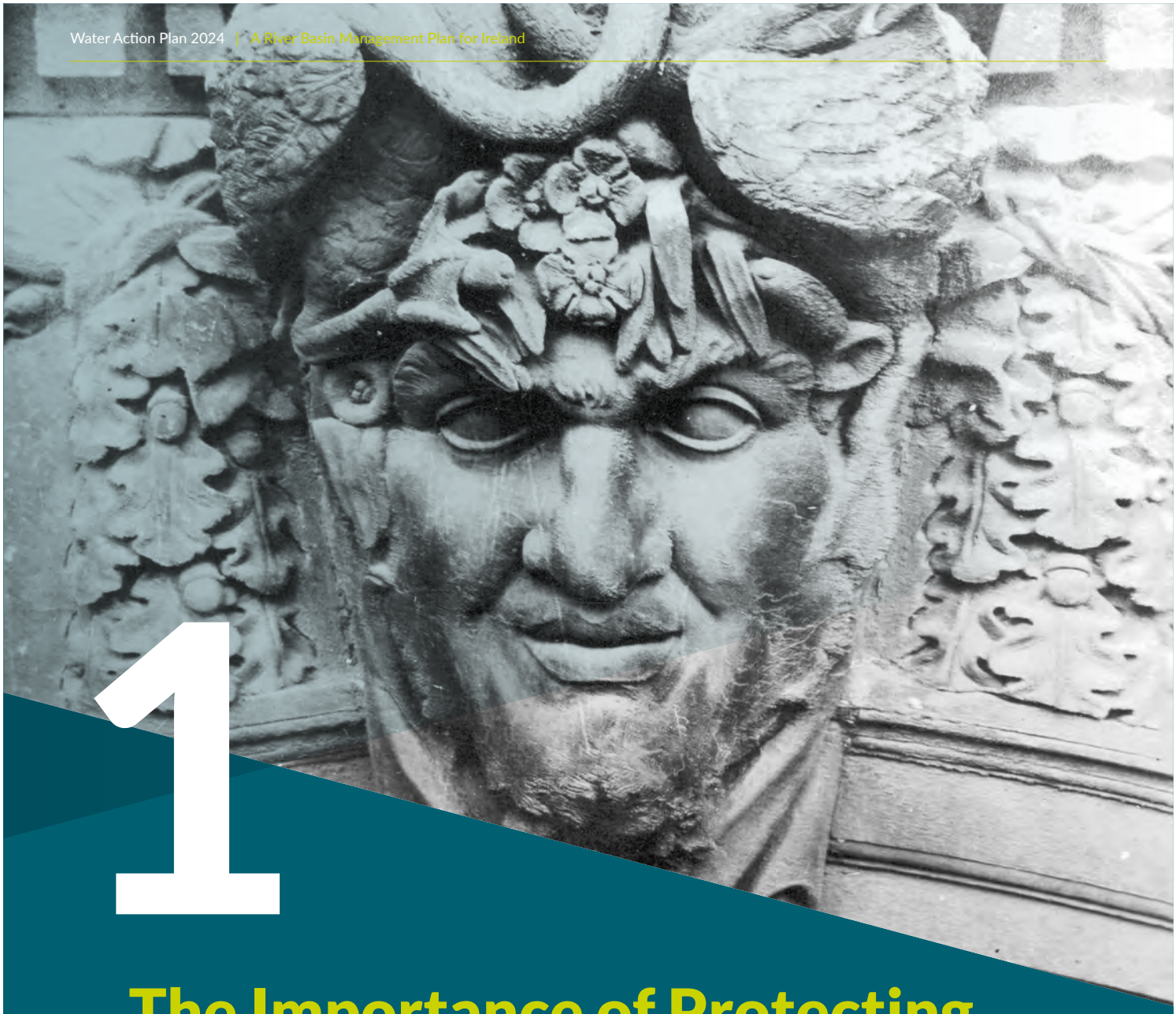
Minister of State for Nature, Heritage and Electoral Reform

Table of Contents

CHAPTER 1 - THE IMPORTANCE OF PROTECTING OUR NATURAL WATERS 5
CHAPTER 2 - STATUS OF IRELAND'S WATER BODIES. 12
CHAPTER 3 - SETTING ENVIRONMENTAL OBJECTIVES. 28
CHAPTER 4 - MEASURES REQUIRED. 44
CHAPTER 5 - PROGRAMME OF MEASURES TO 2027 51
CHAPTER 6 - IMPLEMENTATION AND GOVERNANCE. 74
CHAPTER 7 - PUBLIC AND STAKEHOLDER ENGAGEMENT. 88
CHAPTER 8 - ECONOMIC ANALYSIS OF WATER USE 101
CHAPTER 9 - LIST OF ACTIONS. 110

Images of River Gods sculptures from Custom House, Custom House Quay, Dublin 1 used with permission of the Office of Public Works. Visit the Custom House Visitor Centre webpage for further information: https://heritageireland.ie/places-to-visit/custom-house-visitor-centre/

***[CABL #] Where stated in the text this is a reference to an indicated action in the 2022 Citizen's Assembly on Biodiversity Loss report recommendations**



1

The Importance of Protecting Our Natural Waters

The Government is committed to protecting and restoring Ireland's natural waters by complying fully with the requirements of the Water Framework Directive. This Water Action Plan will accelerate the identification and implementation of the right measures in the right places to both restore and protect all water bodies.

The importance of protecting our natural waters

Access to sufficient, clean water is essential for human life and is the foundation of all urban and rural society. Ireland has abundant natural water resources. Nevertheless, freshwater for human use is a relatively scarce and limited resource that needs protection. Well-managed and protected water catchments provide vital public goods: reliable, clean water to drink; sanitation; protection against flooding; support for biodiverse ecosystems and climate mitigation. Protecting water is a multifaceted problem and so needs a holistic management approach where all stakeholders are involved. This third-cycle plan sets out how Ireland will manage its water resources and catchments up to 2027.

After many years of steady improvement up to 2012, Ireland is experiencing a sustained decline in water quality since that time as evidenced by the decreasing number of high status water bodies, and the increasing number of moderate and poor status water bodies. Enhanced measures are now required in response to protect water from further declines and to restore water quality. In addition to restoring water quality, sustainable water management is important to address and adapt to Ireland's changing climate. Protecting and restoring water quality in Ireland requires enhanced measures to address the loss of excessive nutrients from land to water; measures to re-establish natural conditions of our rivers; and continued investment to improve wastewater treatment infrastructure. There will be an increasing demand on our urban and rural water and wastewater services due to population and economic growth, all set against a backdrop of widespread, rapid, and intensifying climate change.

Ireland has abundant natural water resources in rivers, lakes and groundwater. These water resources have an inherent and indisputable value themselves, but also provide very significant ecosystem services to our lives and businesses. Ireland's drinking water supplies rely primarily on surface water – rivers and lakes, but smaller schemes in rural areas are often supplied by groundwater. Sources of drinking water are considered for additional monitoring and protection from potential risks such as pesticides, excess nitrogen and from discharges of pollutants of concern (including micro-pollutants). Groundwater must be protected from chemical pollution and especially from excess nitrates.

Our food industry trades on Ireland's image as a clean and green source of sustainable food production. Ireland's tourism industry relies on our image as a green island with well-stocked, healthy fisheries; with unpolluted estuaries without excessive algae or algal blooms; and with clean beaches next to good quality bathing waters. Each of these requires our water catchments to be well protected.

The Water Policy Landscape

United Nations and Global Water Policy

In 2023, the United Nations held a historic conference on water, the first in a generation. This conference marks a watershed moment in putting the global water crisis on the international agenda alongside climate change and biodiversity loss. At present, humanity is facing a future without water security. A quarter of the global population (2 billion people) rely on unsafe drinking water sources, while 3.6 billion people live without safely managed sanitation. The Conference was a comprehensive review of the 'International Decade for Action'. World leaders, civic society, business and academics focused on a common goal of getting the world on track to meeting Sustainable Development Goal 6 – On Clean Water and Sanitation. The outcome of the conference is a Water Action Agenda (non-binding commitments); included putting water back on the UN Agenda by considering the appointment of a Special Envoy on Water.

Water action has, or will feature, at a number of key Summits: the SDG Summit during the UN General Assembly held in September 2023, the Summit of the Future in 2024, the World Social Summit in 2025, and through the annual High-Level political forum on sustainable development, the Conference of Parties.

United Nations Sustainable Development Goals

The 2030 Agenda for Sustainable Development, adopted by all United Nations Member States in 2015, provides a shared blueprint for peace and prosperity for people and the planet. At its heart are the 17 integrated Sustainable Development Goals (SDGs). SDG 6 is to '*ensure availability and sustainable management of water and sanitation for all*'. To achieve this goal, the UN has set the following targets by 2030;

- Achieve universal and equitable access to safe and affordable drinking water for all
- Achieve access to adequate and equitable sanitation and hygiene for all and end open defecation, paying special attention to the needs of women and girls and those in vulnerable situations
- Improve water quality by reducing pollution, eliminating dumping and minimizing release of hazardous chemicals and materials, halving the proportion of untreated wastewater and

substantially increasing recycling and safe reuse globally

- Substantially increase water-use efficiency across all sectors and ensure sustainable withdrawals and supply of freshwater to address water scarcity and substantially reduce the number of people suffering from water scarcity
- Implement integrated water resources management at all levels, including through transboundary cooperation as appropriate
- Protect and restore water-related ecosystems, including mountains, forests, wetlands, rivers, aquifers and lakes

The UN has also included targets to expand international cooperation and capacity-building support to developing countries in water as well as to support and strengthen the participation of local communities in improving water and sanitation management.

European Union Policy

In its 2019 policy roadmap, 'the European Green Deal', the European Union has recognised that climate change and environmental degradation is an existential threat to Europe and to the world. In 2020, the EU agreed a recast Directive on Drinking Water, recently transposed by the European Union (Drinking Water) Regulations 2023. As part of the European Green Deal, the EU Commission is also reviewing water legislation including its directives on urban wastewater, bathing water, environmental quality standards for water, industrial emissions, and sewage sludge.

Ireland

The 2020 Programme for Government contains an ambitious programme for the environment. Under the 'Green New Deal' mission a comprehensive range of actions is outlined including for water, for natural heritage and biodiversity, climate, and environmental emissions. The need for an integrated approach to these issues is recognised, including the potential to deliver integrated measures, which benefit all environmental objectives.

Most recently, the report of the Citizen's Assembly on Biodiversity Loss contained recommendations on freshwater and called for prompt, decisive and urgent action by the State to address biodiversity loss and restoration and to provide leadership in protecting Ireland's biodiversity for future generations.

A Water Action Plan for Ireland

The Water Action Plan 2024 is Ireland's third River Basin Management Plan and it outlines the measures the Government and other sectors are taking to improve water quality in Ireland's groundwater, rivers, lakes, estuarine and coastal waters, and provide sustainable management of our water resources (as specified under SDG 6). This Water Action Plan enhances and builds upon the work of the first and second-cycle plans. Where necessary, this plan addresses the shortcomings experienced during the implementation of previous plans. The responses to shortcomings addressed include, for example, strengthing the incorporation of the integrated catchment management approach, improving the environmental ambition, improving the evidence base for 'targeting the right measures in the right place' and securing dedicated resources to deliver these, increasing environmental enforcement and compliance, and strengthening the governance structures. The Environmental Protection Agency ('EPA') reports that water quality in Ireland has made some improvements but these are being offset by declines in water quality elsewhere. Just over half of surface waters (rivers, lakes, estuaries and coastal waters) are in satisfactory condition (that is they are achieving good or better ecological status).

Working together

Meeting the challenge of protecting and improving Ireland's water quality will continue to be a complex undertaking. There is also a significant challenge in cross-sectoral coordination. Close coordination is needed to identify and exploit any potential opportunity and co-benefits for mitigating and adapting to climate change as well as for biodiversity protection. In this cycle there will be an emphasis on collective efforts and space given to collaborative activities to encourage collaboration and coordination through the governance structures.

Building on the work of the second-cycle River Basin Management Plan, this plan will again describe the main pressures and activities affecting water status and set out the environmental objectives to be achieved up to 2027 and identify the measures needed to achieve these objectives. Implementing these policies and measures will require ongoing collaborative participation of stakeholders at national, regional, sectoral and community levels.

Mission Statement

To take action to protect and improve all of Ireland's water bodies by implementing the right measure in the right place, at the right time, with the objective of reaching as close to full compliance with the Water Framework Directive by 2027 as possible, and closing any remaining gaps as quickly as possible, thereafter, subject to the rules of the directive.

What is the Water Framework Directive?

The Water Framework Directive[1] ('the **Directive**') was adopted by member states across Europe in 2000. It requires an integrated and harmonised approach to water policy, protection and management across Europe. The Directive sets our consistent management units for all natural waters:

- River basin districts
- Individual water bodies
- a combined approach to water pollution and a common approach to priority substances

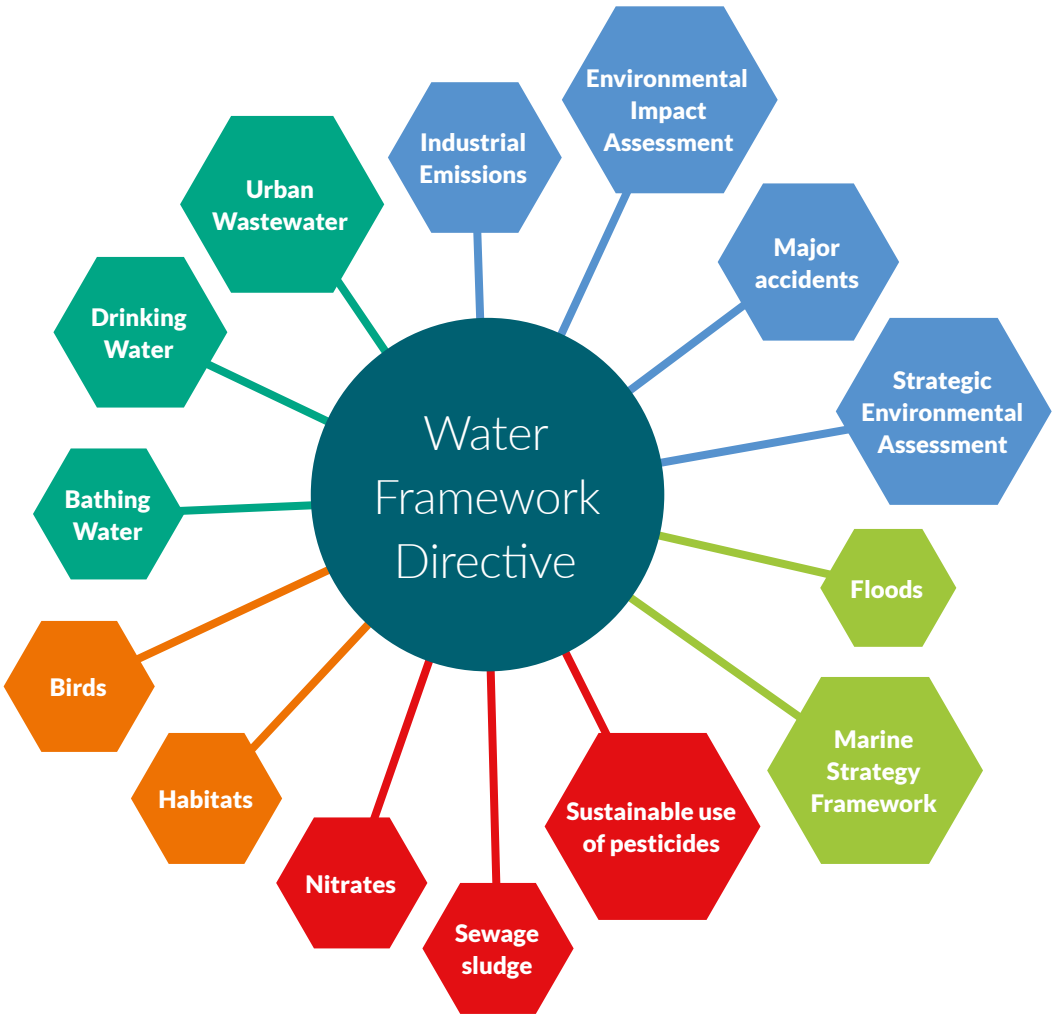
In summary terms, all waters (rivers, lakes, groundwater, estuaries, coastal waters, canals and reservoirs) are protected and measures must be put in place to ensure quality of these waters is restored to at least 'good' status or good potential (with some exceptions) by 2027 at the latest. The Directive applies to all activities that may have an impact on this objective or on the quality or quantity of water.

The Directive requires an integrated approach to water protection and restoration across all policy sectors, including, for example, agriculture, industry, spatial planning policy.

The Water Framework Directive requires that a River Basin Management Plan is published to set out the measures necessary to protect and improve the quality of our waters (See Appendix 3 for details of the elements to be covered in river basin management plans as per Annex VII of the Directive). These plans are prepared in 6-year cycles, during which a programme of measures must be implemented to achieve water quality objectives.

The Directive is linked to, and reinforces, other EU environmental directives including directives relating to the protection of biodiversity (the Birds and Habitats Directives), directives related to specific uses of waters (drinking water, bathing waters, shellfish waters and urban wastewater directives) and to directives concerned with the regulation of activities undertaken in the environment (Industrial Emissions

Figure 1: WFD interaction with other EU legislation



1 Directive 2000/60/EC of the European Parliament and of the Council of 23 October 2000 establishing a framework for Community action in the field of water policy

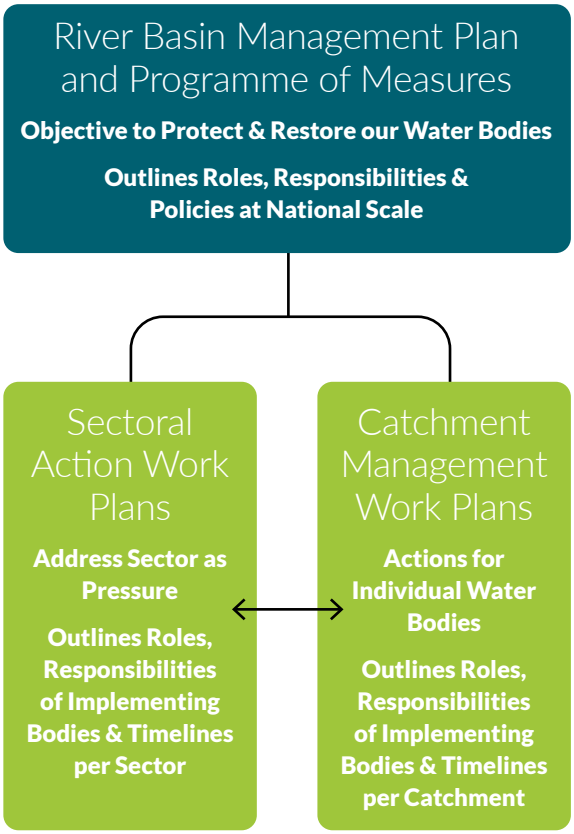
and Environmental Impact Assessment directives). The Nitrates Directive also forms an integral part of the Directive and is one of the key instruments in the protection of waters against agricultural pressures.

Integrated Catchment Management

A water catchment (or 'river basin') is the entire area of land from which surface water run-off flows until it reaches a river, lake, groundwater or the coast. There are various catchment types and sizes. In Ireland the development and implementation of the Water Action Plan 2024 follows an 'Integrated Catchment Management' approach. Catchment, sub-catchments and water bodies are used as management units to examine the pressures on our water resources at an appropriate scale. It is also used as a means to communicate issues and actions when bringing together public bodies, communities and businesses that have a connection with these catchments.

This approach uses the catchment, sub-catchments and water bodies as the functional areas and units of the plan. Integrated catchment management will be further strengthened through the development and use of 46 Catchment Management Work Plans and by supporting Sectoral Action Work Plans. The relationship between the national Water Action Plan, the Sectoral Action Work Plans and 46 Catchment Management Work Plans are illustrated in Figure 2. Integrated catchment management approaches will be used to identify and decide on further specific measures for each water body, where they are required in addition to those set in this plan. These will be included in the 46 Catchment Management Work Plans, which will be used to locate measures within each catchment. The co-benefits of water-focused measures on climate and biodiversity should also be identified. Sectoral Action Work Plans will be developed by each of the sectors who are responsible for a specific pressure, for example; Agriculture, Forestry, Urban Wastewater. These Sectoral Action Work Plans will follow a standard template which is aligned with the WFD, and which links specific actions to pressures. The objective of all the Sectoral Action Work Plans will be to ensure the sector will no longer be a significant pressure on water status, and will include information on how the sector will address all water bodies at risk from that pressure with a plan to develop evidence-based targeted restoration measures. These plans will also identify protection measures to ensure that no additional water bodies are put at risk from that sector. Where the sector is the sole pressure, clear reasoning for where the required objective of water bodies cannot reasonably be achieved by 2027 will also be included, as required by Article 4; Section 4 of the WFD.

Figure 2: The relationship between the national Water Action Plan, the Sectoral Action Work Plans and 46 Catchment Management Work Plans



These Catchment Management Work Plans and supporting Sectoral Action Work Plans will be developed with an increased level of public participation through new Catchment Community Fora. These fora will be structured public gatherings to allow communities to engage with and understand what is happening in their local water body or catchment, and to work collaboratively with relevant stakeholders. The objective of the Fora is to involve community representatives and other stakeholders who will help to identify and implement measures in their local catchment. Fora establishment, structure and role will be developed by the Local Authorities Waters Programme (LAWPRO) in five pilot catchments in order to develop a framework for a model on a national scale.

The integrated catchment management process involves;

a. Gathering the best available information to understand the catchment - where the water comes from, how it flows through the landscape and the activities that may be causing pollution.
b. Looking at all the uses of water - drinking, agricultural, industrial and recreational, and the ecosystems that depend on water to survive.
c. Engaging local communities and involving them in the management of their catchment.

d. Adopting appropriate measures to ensure that activities that represent a significant threat to water resources are effectively managed.

e. Applying the scientific and local knowledge of how the catchment operates to protect and improve water, providing a healthy, resilient, productive and valued resource that supports vibrant communities.

f. Review and repeating the process in a cycle of continual improvement.

Water Outcomes

The Water Action Plan includes targeted measures for all water bodies, with the objective of either protecting water bodies at good or high status or restoring water bodies to at least good status.

Where further specific measures are needed in addition to those set in this plan, integrated catchment planning approaches will be used to identify and decide on further specific measures for each water body. This will be reported in 46 Catchment Management Work Plans. These will be used to locate measures within each catchment.

The list of water bodies and their associated status, significant pressures/issues and targeted measures, which are to be included in the Catchment Management Work Plans, will include targets for the third-cycle, along with Key Performance Indicators to monitor progress and outcomes.

Connection to other Plans and Programmes

Ensuring consistent policy integration between the Water Action Plan 2024 and other national and local plans is a continuous process as plans are developed, reviewed and revised. The Strategic Environmental Assessment process has identified the foremost policy papers; plans; and programmes that have an interaction with this plan. The most relevant policy areas include: land use and spatial planning; climate change; flooding protection; water services policy; waste management; food, agriculture and fisheries; forestry; and peatlands.

During the consultation process and policy development dialogue some external stakeholders expressed a view that policy coherence is a priority issue for them and in their view is key to protecting water quality. Building on the strong commitment to the environment which is set out in the Programme for Government, Our Shared Future, the Minister for the Environment, Climate and Communications is set to publish an overarching national statement of environment policy. This policy will result in better co-ordination between different policy areas and a more effective implementation process.

Ireland's water policy regulations require that every public authority exercise its functions in a manner which is consistent with the provisions of the Water Framework Directive and to secure compliance with the Directive and with the provisions of any river basin management plan. The water objectives of this plan will be integrated into future policy statements. This includes for example climate adaptation plans, marine spatial planning, flood risk management plans, biodiversity plans, agricultural policy, and into spatial plans. One of the aims of this policy integration is to ensure that the opportunities for multiple environmental co-benefits are identified and assessed across inter-related policy areas (See Section 'Other Plans and Programmes' in Chapter 6 for further details). The UN recognises that there are significant co-benefits to managing environmental problems in a more coordinated and sustainable manner[2]. Solutions for addressing the above integrated challenges are available and are being implemented by an increasing number of countries and international river basin authorities.

As highlighted by An Fóram Uisce it is clear that many of the necessary measures and actions undertaken or planned for one component of the environment have co-benefits for other components because of the connectedness of nature. Furthermore, positive intervention in one environmental sphere (e.g. land, water or air) can have positive consequences in each of the others[3]. The Table below prepared by An Fóram Uisce illustrates how different farming and forestry practices can deliver a range of environmental benefits.

2 Climate Change and Water UN-Water Policy Brief. September 2019.

3 A Framework for Integrated Land and Landscape Management (FILLM) Protecting and Enhancing Our Environment. An Fóram Uisce. March 2021

Table 1: Illustration of range of environmental benefits provided by different farming and forestry practices within the Framework for Integrated Land and Landscape Management

Management option to address pressures	Water quality	Biodiversity	Flood mitigation	Soil conservation	Landscape	Climate Change Mitigation	Climate Change Adaptation
Creation of buffer strips, e.g. riparian zones, grass margins.	●	●	○	●	○	●	○
Planting of clover and multi-species grasses	●	●	–	●	–	●	–
Planting hedges alongside watercourses & across slopes	●	●	○	●	○	●	○
Liming of mineral soil to ensure optimum pH	●	–	–	●	–	●	○
Agroforestry	●	●	○	●	○	●	○
Planting with native woodlands	●	●	●	–	○	●	○
Interception ponds and constructed wetlands	●	●	○	○	●	●	●
Rewetting peatlands	●	●	○	–	○	●	●

● Management option contributes directly to an environmental benefit

○ Management option contributes indirectly to an environment benefit

Action 1.1: Integrated catchment management approaches will be used to identify and decide on further specific measures for each water body, where they are required in addition to those set in this plan. These will be included in the 46 Catchment Management Work Plans, which will be used to locate measures within each catchment. The co-benefits of water-focused measures on climate and biodiversity will also be identified.

Action 1.2: The Catchment Management Work Plans will include the list of water bodies, their associated status, significant pressures/issues and targeted measures, along with outcomes-based targets for the third-cycle and key performance indicators to monitor progress and outcomes. Justification for water bodies not meeting their WFD objective by 2027 should also be included in catchment management work plans, in line with Article 4 of the WFD.

Action 1.3: Sectoral Action Work Plans will be developed. They will set out the actions to be taken by the relevant authorities in line with their legally binding general duties under Article 3(1) of the 2003 Water Policy Regulations (SI 722 of 2003).

Action 1.4: When developing new policy, Government Departments will have regard to the OECD principles[4] for policy coherence to consider cross-cutting issues; trade-offs and synergies with other key policy objectives (Timeline: Ongoing).

4 OECD (2019), Recommendation of the Council on Policy Coherence for Sustainable Development, OECD, Paris.



2

Status of Ireland's Water Bodies

Ireland's river basin management planning process is based on a single national River Basin District that also incorporates two international River Basin Districts, the North Western and the Neagh Bann, which are shared with Northern Ireland.

Description of Ireland's River Basin District

This section sets out a general description of the characteristics of the river basin district. The river basin covers an area of 70,273 km2 and is broken down into 46 catchment management units. The 46 catchment management units based on main river catchments and these catchments are further broken down into 583 sub-catchments. These 583 sub-catchments contain a total of 4,842 water bodies, ranging from 3 to 15 water bodies in each sub-catchment.

Monitoring Programme

The main purpose of Ireland's National Water Quality Monitoring Programme 2022-2027 is to provide a comprehensive national overview of the ecological and chemical status of surface waters and the quantitative and chemical status of groundwaters. The information is used to track progress towards the achievement of the environmental objectives required by the Water Framework Directive, and those set out in the River Basin Management Plan. The programme is comprised of 2,899 surface and groundwater bodies representing 60% of the total number of national water bodies, covering 2,429 river water bodies, 224 lakes, 80 transitional water bodies, 45 coastal waters, 16 canals and 121 groundwater bodies. The programme is operated by the Environmental Protection Agency, Marine Institute, Inland Fisheries Ireland, Waterways Ireland, National Parks and Wildlife Service and Local Authorities.

Figure 3: Map of Groundwater Monitoring Programme (2022 – 2027)

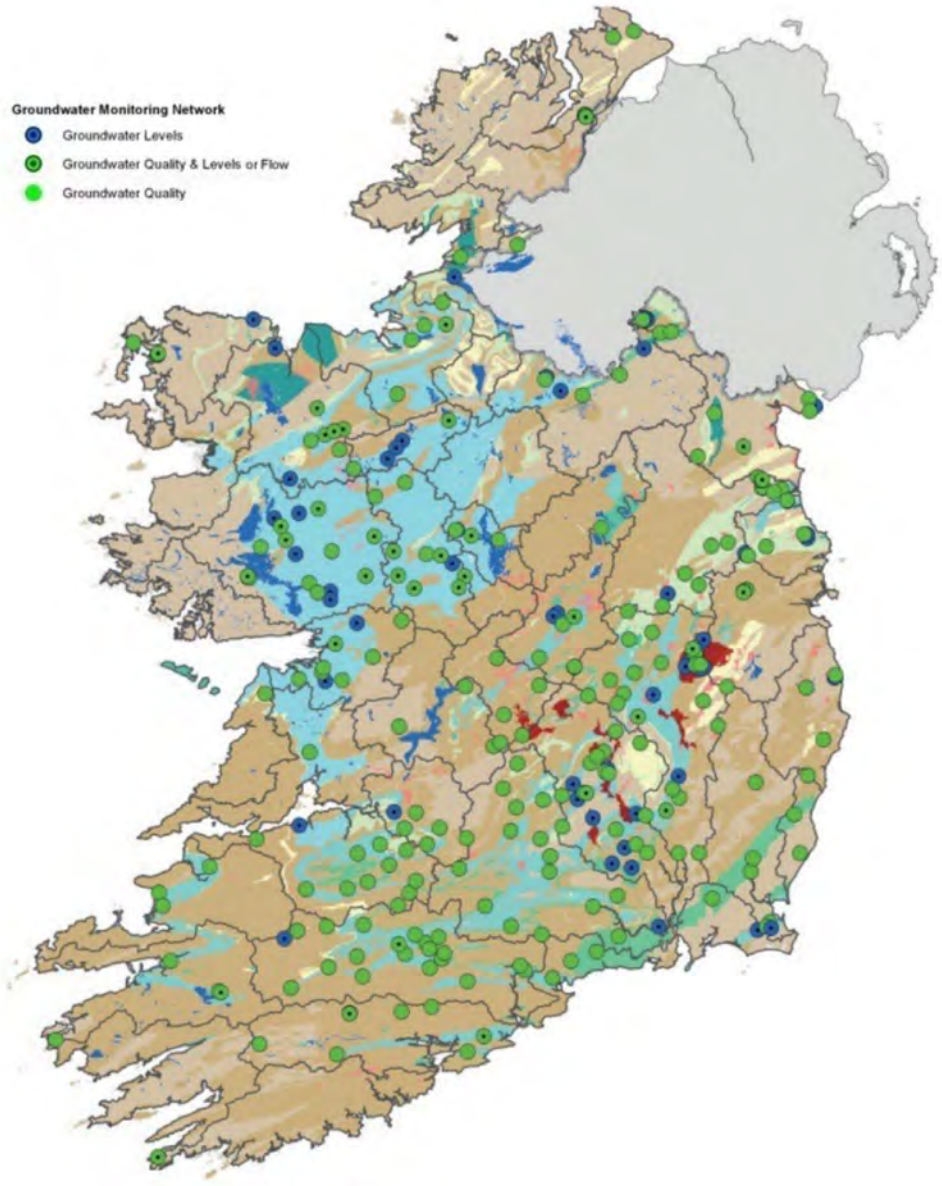
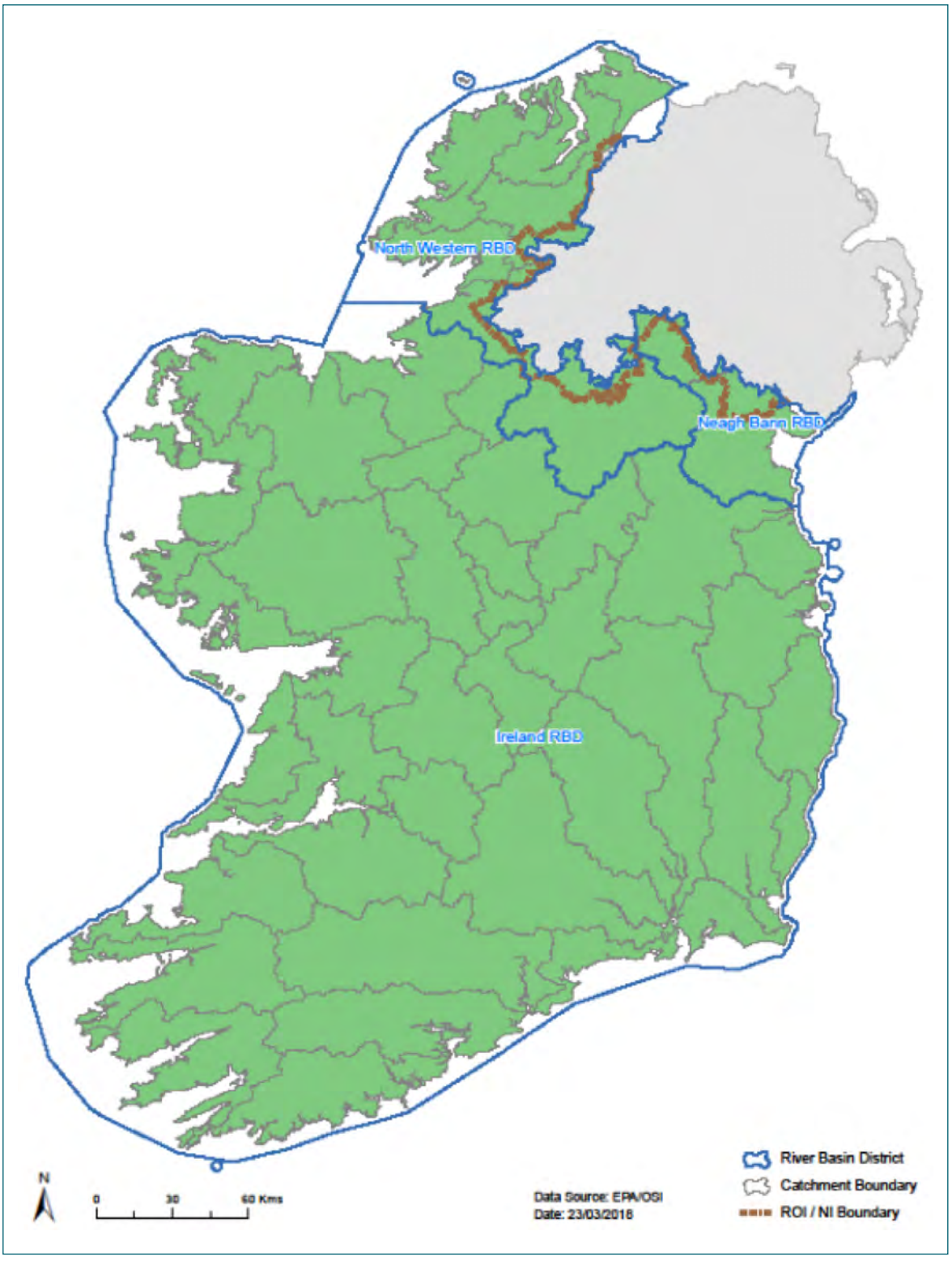


Figure 4: Map of Ireland's River Basin District



What is a "water body"?

A water body is an individual unit of a water feature used for monitoring and planning purposes. For example, in groundwater this is part of an aquifer. For surface water, this is a discrete and significant element of surface water: such as a lake, part of a stream, river or canal, a transitional water or a defined area of coastal water. There are various types including a body of surface water, a body of groundwater and artificial water bodies, which is a body of surface water which has been created in a location where no water body existed before. Finally, there is a particular type of water body called a 'heavily modified water body' (HMWB) which is a surface water which has been significantly altered from its natural state by human activity to serve a specified beneficial use. HMWBs cannot achieve good ecological status due to their alterations, and so must be considered in a different way to an 'unmodified' water body.

Figure 5: Ireland's Catchment Management Units

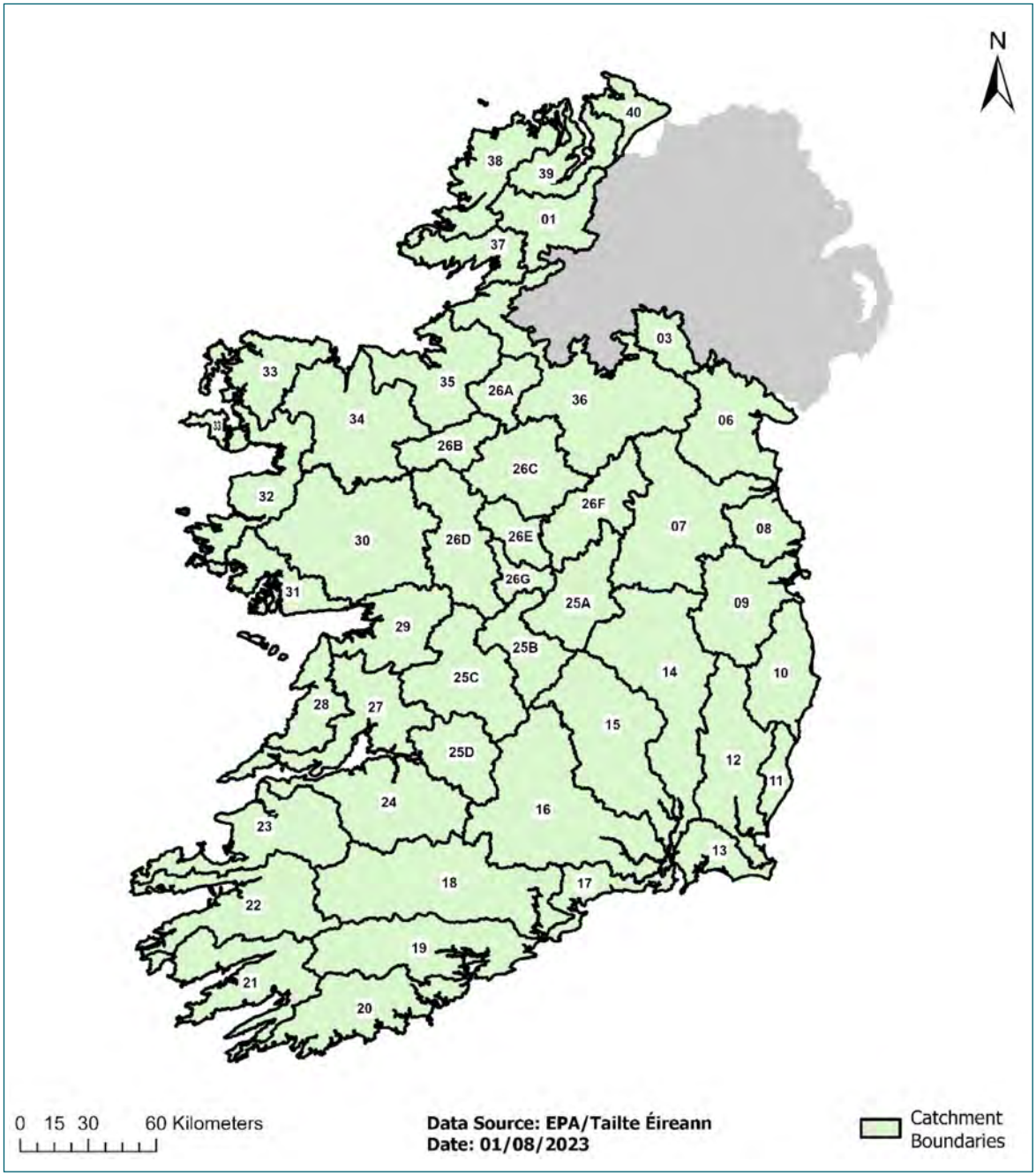


Figure 6: List of Ireland's Catchment Management Units

Catchment No.	Name	Catchment No.	Name
01	Foyle	25C	Lower Shannon
03	Lough Neagh & Lower Bann	25D	Lower Shannon
06	Newry, Fane, Glyde and Dee	26A	Upper Shannon
07	Boyne	26B	Upper Shannon
08	Nanny-Delvin	26C	Upper Shannon
09	Liffey and Dublin Bay	26D	Upper Shannon
10	Avoca-Vartry	26E	Upper Shannon
11	Owenavarragh	26F	Upper Shannon
12	Slaney & Wexford Harbour	26G	Upper Shannon
13	Ballyteigue-Bannow	27	Shannon Estuary North
14	Barrow	28	Mal Bay
15	Nore	29	Galway Bay South East
16	Suir	30	Corrib
17	Colligan-Mahon	31	Galway Bay North
18	Blackwater (Munster)	32	Erriff-Clew Bay
19	Lee Cork Harbour and Youghal Bay	33	Blacksod-Broadhaven
20	Bandon-Ilen	34	Moy & Kilala Bay
21	Dunmanus-Bantry-Kenmare	35	Sligo Bay
22	Laune-Maine-Dingle Bay	36	Erne
23	Tralee Bay-Feale	37	Donegal Bay North
24	Shannon Estuary South	38	Gweebarra-Sheephaven
25A	Lower Shannon	39	Lough Swily
25B	Lower Shannon	40	Donagh-Moville

These 4,842 water bodies are made up of six water body types: rivers account for 66% of all water bodies, lakes (17%), groundwater (11%), transitional water bodies (4%), coastal water bodies (2%) and canals (<1%).

Catchments data website

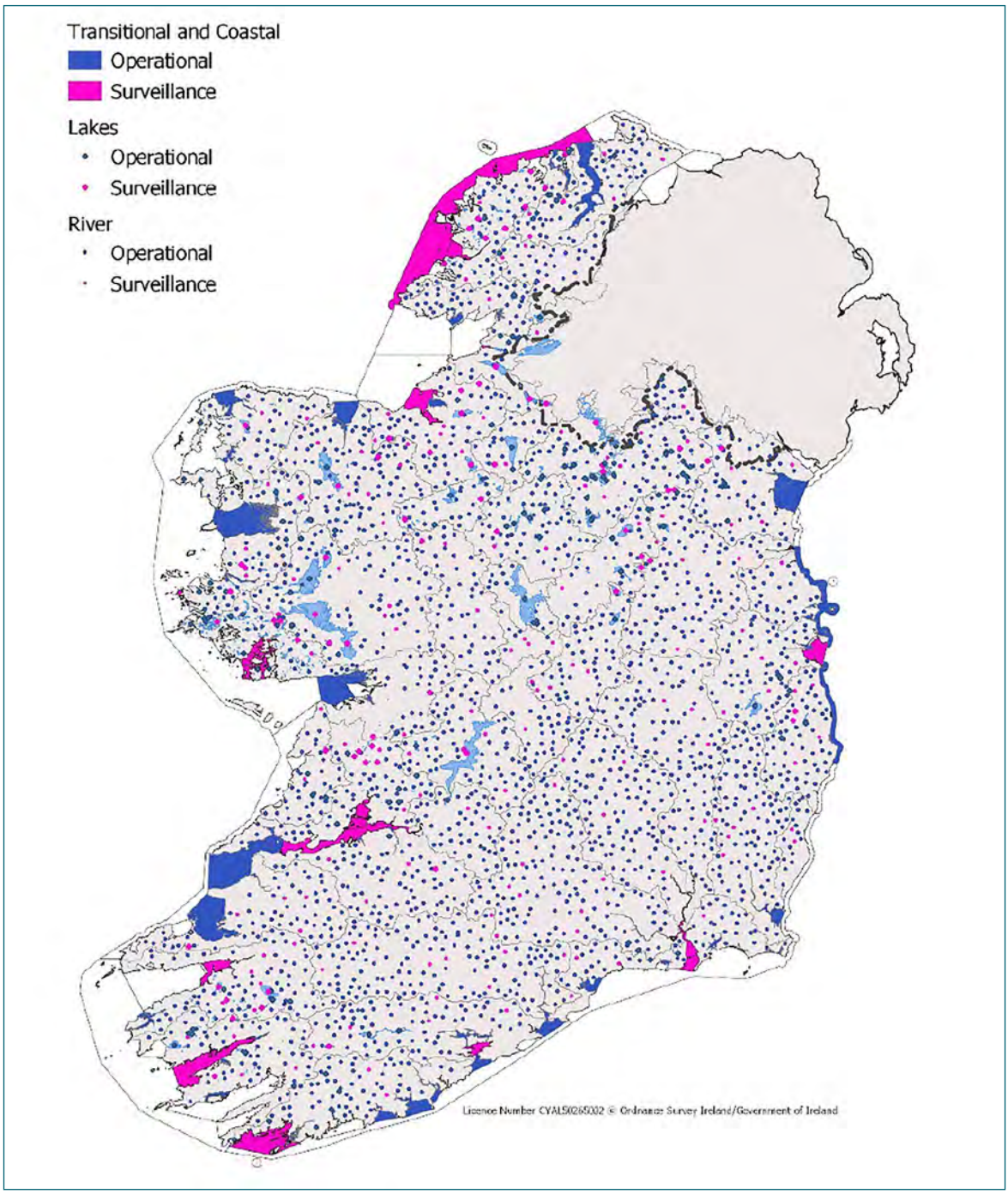
Full details, background data, and supporting information for this River Basin Management Plan in relation to each water body and maps of their location within Ireland's River Basin District is available at the catchments.ie website. This site provides substantial background information for this plan and the most current and up-to-date information on the status of your local rivers, lakes and water bodies. Information on how these valuable resources are being used and the environmental pressures they are subject to, is also provided through specific Catchment Assessments that are available for download on the site.

There were 33 water bodies designated as heavily modified in the first and second-cycle plans. Further details on these water bodies and the technical designation review that was carried out for the third-cycle are outlined in Chapter 3. A final public consultation on proposed designations is currently being undertaken by DHLGH. Any new designations will be appended to this River Basin Management Plan for the third-cycle.

Table 2: Breakdown and number of water body types

Water body type	Number of water bodies
River	3,192
Canal	16
Lake	812
Coastal waters	112
Transitional waters	196
Groundwater	514
Total	**4,842**

Figure 7: Map of EPA Monitoring Network 2022 - 2027



Definition of types:

Rivers: Article 2 of the Water Framework Directive defines a 'River' as a body of inland water flowing for the most part on the surface of the land but which may flow underground for part of its course. Ireland has over 84,400km of river channels comprising streams, rivers and tributaries, with 3,192 defined river water bodies.

Canals: Canals are artificial water bodies that are used primarily for recreation and navigation and are part of a wider network that includes feeder streams that supply canals with water. Waterways Ireland is responsible for the monitoring and assessment of water quality in our canals, including the Grand Canal, the Royal Canal and the canalised section of the Shannon-Erne waterway. The canals traverse 8 catchments across Ireland and are divided into 16 water bodies for the canal monitoring programme.

Lakes: There are an estimated 12,000 lakes in Ireland covering an area of 1,200km². 812 lakes are designated as Water Framework Directive water bodies. Ireland's water bodies includes all lakes that are more than 5 ha in size comprising 206 lakes. For other lakes less than 5 ha in size, then the water

bodies include those in protected areas or those otherwise having a significant value.

Coastal waters: Waters that extend one nautical mile from a baseline defined by the land points where territorial waters are measured and which otherwise have not been designated as transitional waters. Coastal waters cover an area of 13,325km² and incorporate 112 water bodies.

Transitional waters: Transitional waters cover an area of 844 km² over 196 water bodies, and is the term used to describe estuaries and coastal lagoons.

Groundwater: Subdivisions of large geographical areas of aquifers so that they can be effectively managed in order to protect the groundwater and linked surface waters. In practical terms, a groundwater body is that water that is in the saturated zone below the water table down to the level that could be exploited for human activities or support surface flows and ecosystems (default values are used where local data is not readily available). The upper extent of the groundwater body is the water table or where the water table cannot be determined, then the upper extent can be considered as ground level.

Description of International/ Shared Waters

Under the WFD, the Republic of Ireland and Northern Ireland are required to co-ordinate efforts in relation to the two international river basin districts. While the withdrawal of the United Kingdom from the European Union has changed the legal status under the Water Framework Directive, for practical purposes, the institutional arrangements remain unchanged. During this cycle (2022-2027) the North/South Water Framework Directive Coordination Group established under the North/South Ministerial Council (a body established under the Good Friday Agreement) will continue to oversee the ongoing co-ordination across the Island of Ireland between implementing authorities. The areas for cooperation include the environment generally and specifically environmental protection, pollution and water-quality management.

Each jurisdiction continues to carry full responsibility for ensuring implementation of all the River Basin Management Plans and Programmes of Measures in their national territory, including any part of an International River Basin District that lies within their national territory. Two river basins districts are shared with Northern Ireland. The Neagh Bann International RBD has 35 shared water bodies from a total of 407. The North Western International RBD has 85 shared water bodies from a total of 1,232.

The rivers and lakes of the island of Ireland are designated as being within a single eco-region (eco-region 17), requiring a high degree of co-ordination between the authorities in both jurisdictions to ensure consistent management of the entire aquatic environment.

All coastal and transitional waters surrounding the island of Ireland are also included in one eco-region (eco-region 1), and their management must be closely co-ordinated.

A collaborative 'Shared Waters' document is being published following publication of the River Basin Management Plans of the Republic of Ireland and Northern Ireland. The 'Shared Waters' document will outline the coordination that is working towards protecting and enhancing the water bodies that are part of the International River Basin Districts, and will also include the ecological status for surface water bodies and the overall status for groundwater bodies.

Following public consultation in 2003 in relation to the international river basin districts, administrative arrangements for implementation of the WFD were put in place and remain unchanged for this cycle. These include:

- Co-ordination arrangements established by Ministers in both jurisdictions
- The establishment of the North/South Water Framework Directive Co-ordination Group under the auspices of the North/South Working Group on Water Quality
- The establishment of various technical working groups with joint representation from technical experts within state bodies (North-South rivers and lakes group, UKTAG and support groups)
- Cross-representation on respective national and RBD level groups

The North/South Water Framework Directive Coordination Group will continue to oversee the ongoing co-ordination between the national authorities.

Action 2.1: The DHLGH shall continue to engage with counterparts in Northern Ireland *via* the North/South Water Framework Directive Co-ordination Group as is necessary to ensure coordination of programmes of measures across the whole of shared river basin districts (Timeline: Ongoing).

Action 2.2: A collaborative 'Shared Waters' document will be published following publication of the River Basin Management Plans of the Republic of Ireland and Northern Ireland.

Description of the land use

The most significant influence on water quality management, and any risk to water status, is the land use within the water catchment. Land use across Ireland's River Basin District is dominated by agriculture – 55% pastures, 7% principally agricultural land, 5% arable land and 1% complex cultivation. Forestry accounts for 6% of land use. Compared to many other European countries, Ireland also has a high proportion of our population living in rural areas. A breakdown of the types of land use seen in Ireland is outlined in Figure 8.

According to the 2022 Census, Ireland's population was 5.14 million. Under most projected scenarios this is expected to grow up to 2051, leading to increased demands on Ireland's water resources. Figure 9 below illustrates the projected population at 5 year intervals using a moderate scenario from 2016 – 2051 and shows a population increase of 1,290,900 (+27.2%) over the period to 6.03 million persons, equivalent to a 0.69 per cent annual average increase.

Figure 8: Land Use in Ireland [Socio-Economic Dimensions of Land Use 2023, Land Use Review, CORINE dataset of land cover Ireland 2018.

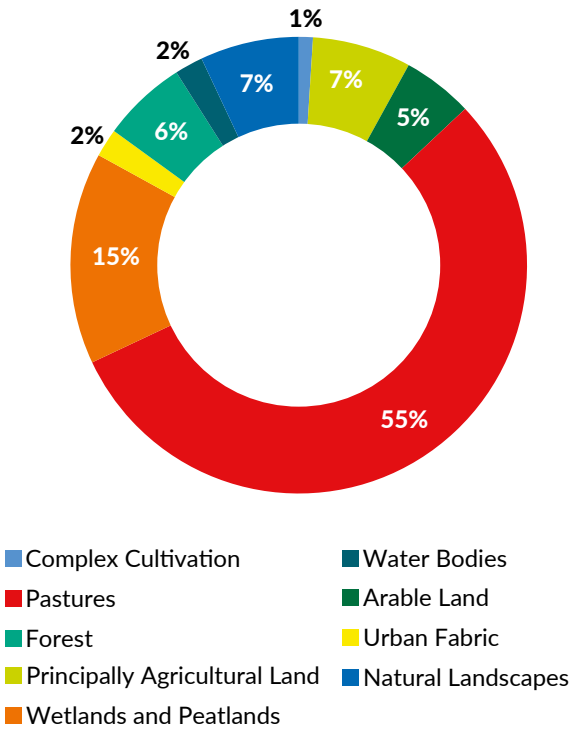
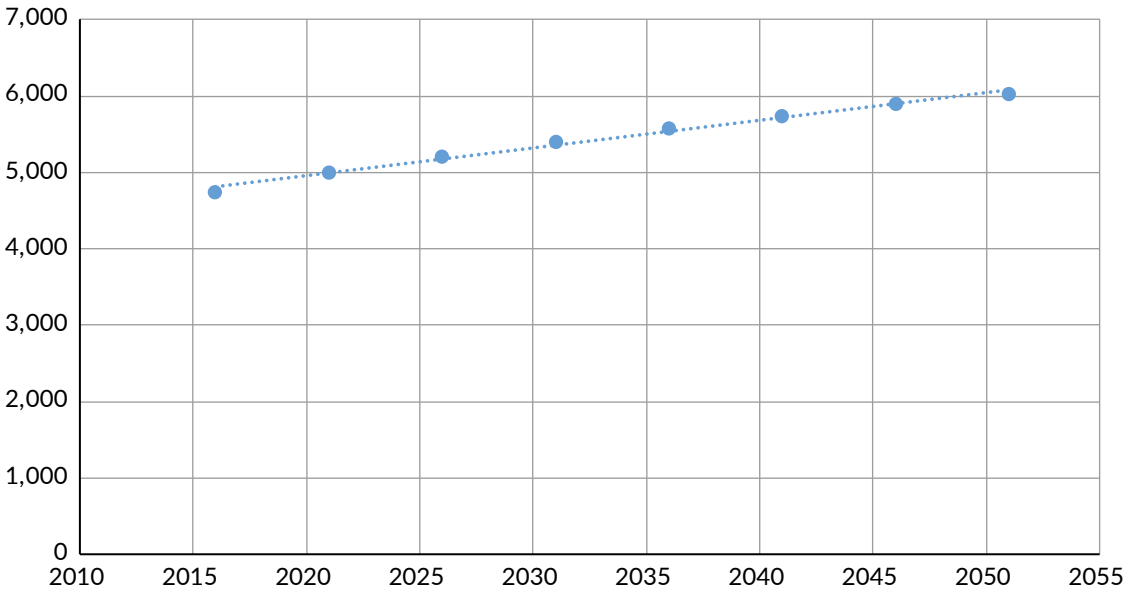


Figure 9: Projected Population, 2016 – 2051 [Central Statistics Office, M2F2 projection scenario]



Where we stand now – Ireland's Water Quality

The current condition of our waters is assessed against the standards and environmental objectives set out in the Water Framework Directive and other water-related EU legislation. In total the EPA assesses over 4,000 surface water bodies for ecological status and 514 groundwater bodies are assessed for groundwater status. The monitoring programme is carried out over a 6-year period. The following analysis is based on the most recent assessment of water bodies over the period 2016-2021.

Surface waters are classified by their ecological status (biology, water quality and hydromorphology combined) and chemical status (level of harmful chemicals in the water). Hydromorphology is not a widely recognised characteristic of natural water waters. It is essentially the flow, form and function of natural surface water bodies. Groundwaters are classified according to their chemical status and quantitative status (the amount of water present). This information is combined to provide an overall status of surface waters and groundwater. The element with the lowest status in each step of the process determines the overall classification, and is referred to as the 'one out, all out' principle.[5]

Surface Water and Groundwater Status

The numbers of surface water bodies achieving high, good, moderate, poor and bad ecological status in each water body type are outlined in Table 3 below. The location of these water bodies and their corresponding status can also be seen in Figure 10.

Groundwater status is determined using five chemical and four groundwater quantitative tests, resulting in either a classification of good or poor status. The numbers of groundwater bodies achieving good or poor status is also outlined in Table 3 below.

Overall, 54% of surface waters are in good or high ecological status while the remaining 46% are in unsatisfactory ecological status. For groundwater bodies, 91% are in good chemical and quantitative status. Figure 10 shows the national distribution of the surface water status classes and Figure 11 outlines the percentage breakdown of status for each water body type for the period 2016-2021. The next status reporting period will be based on data from 2019-2024 and will be published in 2025.

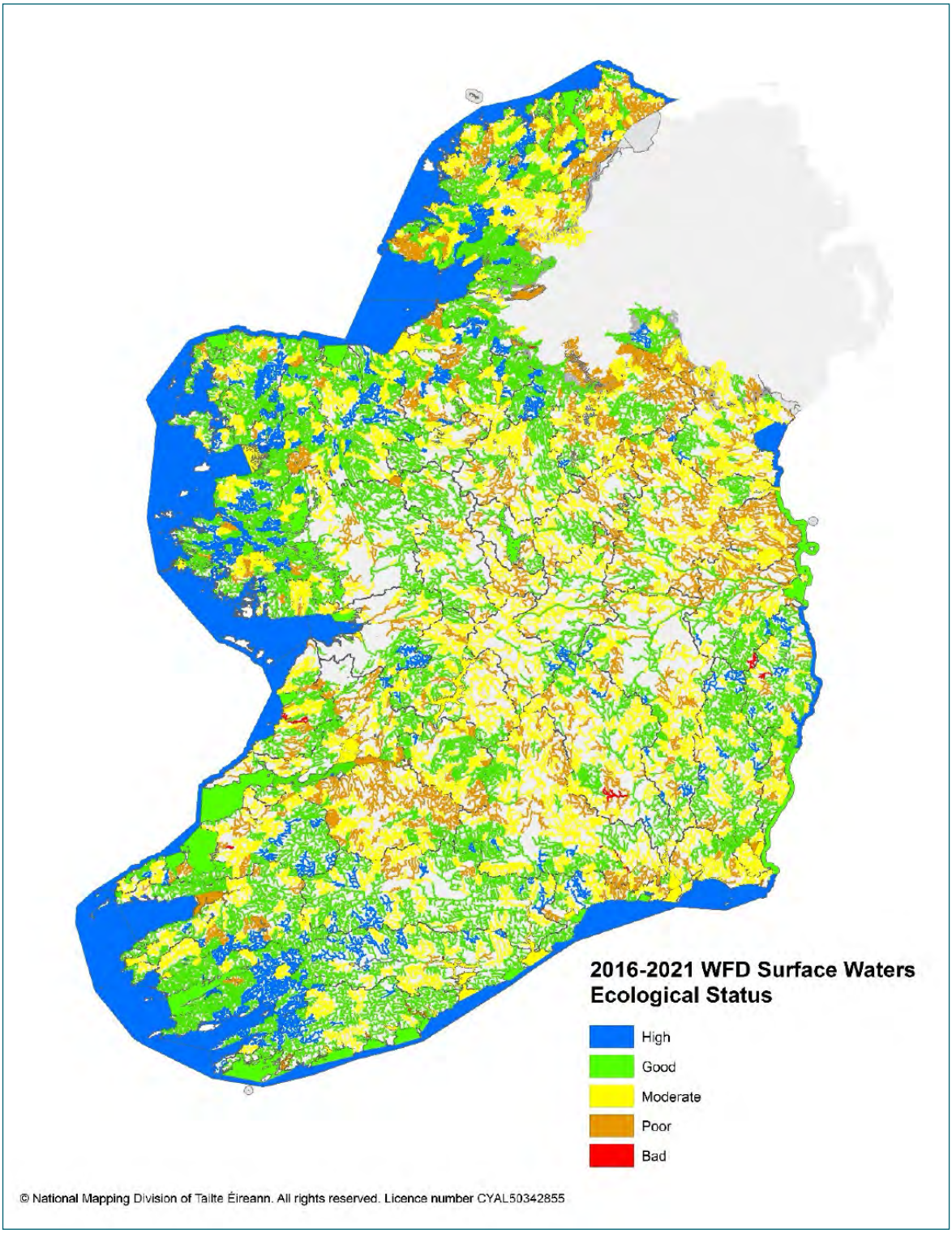
Table 3: Summary of status for each water body type

Type	High	Good	Moderate	Poor	Bad	Unassigned	Total
River	257	1,345	1,028	554	5	3	**3,192**
Canal*	-	16	-	-	-		**16**
Lake	251	306	168	79	8		**812**
Transitional	28	27	79	18	4		**156**
Coastal	44	35	16	1	1		**97**
Groundwater	-	470	-	44	-		**514**
Total	**580**	**2,199**	**1,291**	**696**	**18**	**3**	**4,787**

*ecological potential for canals

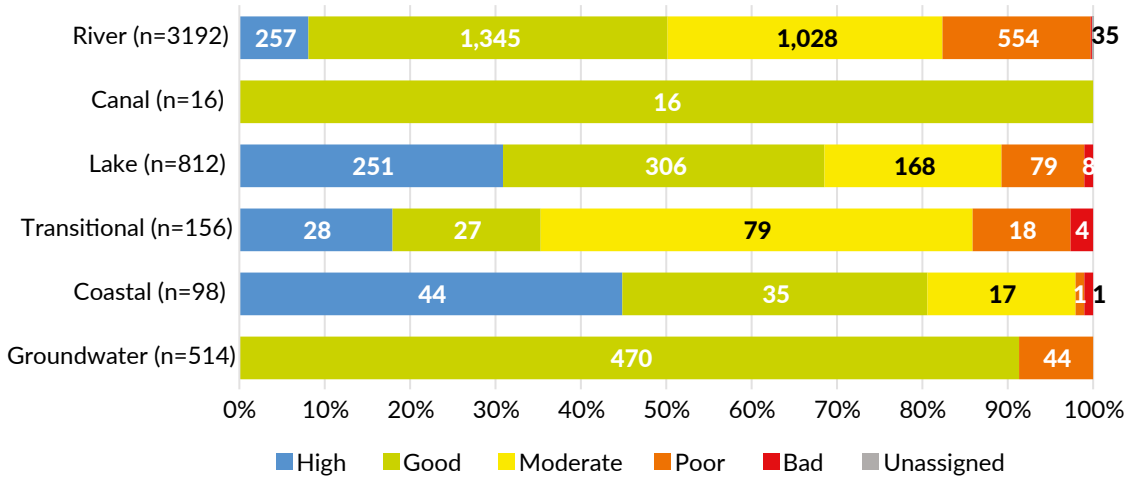
5 EPA (2022), Water Quality in Ireland 2016 – 2021, EPA, Ireland.

Figure 10: Ecological status of surface water bodies for the period 2016-2021.



© National Mapping Division of Tailte Éireann. All rights reserved. Licence number CYAL50342855

Figure 11: The percentage of water bodies (numbers also indicated) achieving each status class for each water body type for the period 2016-2021.



Further details on water body status can be found in the Water Quality in Ireland 2016-2021 report (https://www.epa.ie/publications/monitoring--assessment/freshwater--marine/EPA_WaterQualityReport2016_2021.pdf)

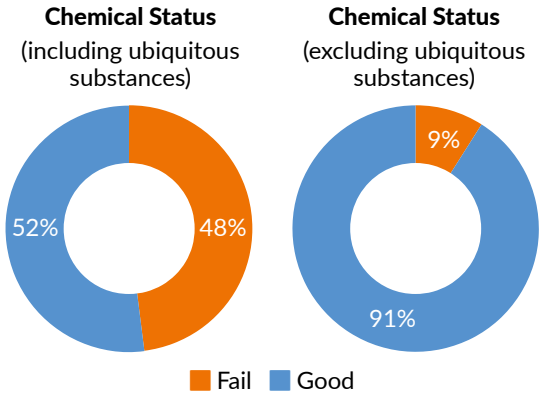
Chemical Status

The presence of chemical substances known as priority substances or priority hazardous substances in water bodies is of interest as these substances can be persistent is the environment, bio-accumulative and toxic. The concentrations of these substances in the water bodies are compared against Environmental Quality Standards (EQSs). These EQSs have been set to protect the most sensitive aquatic organisms and to protect those higher up the food chain (predators and humans) from their damaging effects. Where one or more of these substances are found at concentrations above an EQS, then the water body fails to achieve Good Chemical Status.

167 (48%) of the 349 Irish surface water bodies assessed failed to achieve Good Chemical Status. Many of these failures were due to substances, such as Mercury and Polycyclic Aromatic Hydrocarbons (PAHs), Poly-Chlorinated Biphenyls (PCBs) and Poly-Brominated Diphenyl Ethers (PBDEs). These substances are referred to as ubiquitous, as they are found in most water bodies across Europe. They originate from atmospheric deposition (e.g., Mercury and PAHs) as a result of the burning of fossil fuels or are a legacy from past industries (PCBs). When these substances are excluded from the assessment 30 (9%) of monitored water bodies failed to achieve Good Chemical Status. The non-ubiquitous failures were due to the insecticide Cypermethrin and some heavy metals such as Cadmium and Lead.

In presenting information on chemical status, results can be presented with or without ubiquitous substances (Figure 12). This is done to ensure that improvements achieved with other substances, which can be addressed through local and national programmes of measures, are not obscured by including ubiquitous substances, which also require longer term action at an international level.

Figure 12: Chemical status of surface waters 2016-2021.



Further information on the monitoring programme, which provides details on the monitoring undertaken to support the status assessment, is available at:

https://www.epa.ie/publications/monitoring--assessment/freshwater--marine/EPA_WFD_MonitoringProgramme_2019_2021-(1).pdf.

Change in status since the last assessment

A comparison of the changes in surface water status between the 2013-2018 assessment and the 2016-2021 assessment shows that while there have been improvements (443 water bodies) and declines (428

water bodies) in water quality across all classes[6], there has been little net change in status overall, and a slight net decline in the number of water bodies that are meeting their environmental objectives. Indeed, the percentage of water bodies at good or better ecological status has decreased in each subsequent assessment period since the first baseline water status assessment was undertaken in 2007-2009 (Figure 13).

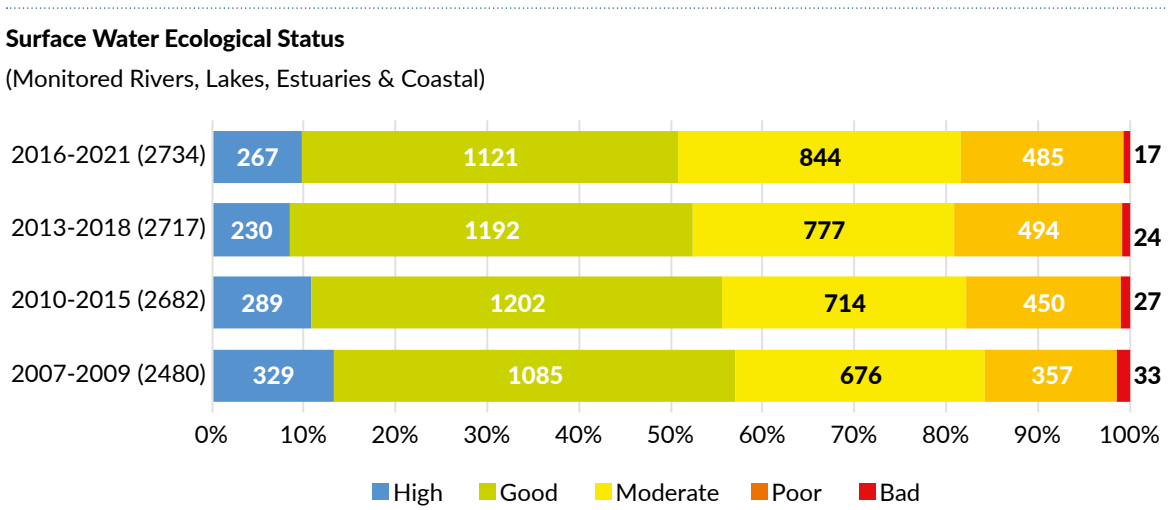
Characterisation

The catchment characterisation assessment focuses on identifying the water bodies that are '*At Risk*' of not meeting the Water Framework Directive environmental objectives of achieving at least good status (Figure 14 15). Risk is assessed using the water quality monitoring data, the trends over time and the target objective. For water bodies that are '*At Risk*', the assessment also identifies the significant pressures impacting on the waters. Once pressures are determined, measures can then be identified and targeted specifically at these pressures. Local Catchment Assessments are an essential tool in helping to target resources and the selection and implementation of "the right measure in the right place".

Table 4: Change in surface water (rivers, lakes, transitional and coastal) ecological status between 2013-2018 and 2016-2021.

Category	No Change	Declined	Improved	Net Change
Rivers	1,628	371	398	27
Lakes	167	29	28	-1
Transitional	40	19	11	-8
Coastal	27	9	6	-3
Total	**1,862**	**428**	**443**	**15**
Percentage	68.1 %	15.7 %	16.2 %	0.5 %

Figure 13: Ecological status of monitored surface water bodies across each of the main assessment periods from the first assessment in 2007-2009 to the present assessment period (number of water bodies indicated).



Of the 500 river water bodies monitored in the designated Priority Areas for Action (PAAs) during 2019-2021, 314 remained stable with no change in ecological status. A total of 118 river water bodies showed improvements in status, while 68 declined, resulting in a net overall improvement in status class in 50 water bodies in the Priority Areas for Action. The net improvement in river water quality in PAAs is higher than the improvements seen nationally. This may indicate that when targeted action is taken improvements in water quality can be achieved. Nevertheless, a large number of river water bodies are still declining and unless this is addressed, sustained and progressive improvements in water quality will be difficult to achieve.

The latest characterisation assessment was undertaken in 2023 by the EPA using monitoring and other data for the period up to, and including 2021. Input from the Local Authority Waters Programme/ Local Authorities and members organisations of the five Regional Operational Committees was also incorporated.

6 An improvement in status does not necessarily mean that the water body is meeting its environmental objective, it could, for example, have improved from poor to moderate status and still remain in unsatisfactory condition.

Risk

The outcomes of the latest characterisation assessment show that:

1,963 (41%) water bodies are within the '*Not at Risk*' category; they are meeting their environmental objective of good or high-status.

1,649 (34%) water bodies are '*At Risk*' of not meeting their environmental objective of good or high-status, significant pressures have been identified for these '*At Risk*' water bodies.

1,230 (25%) water bodies are currently in '*Review*', which means that either (1) the measure is in place but the water quality improvement has not yet been realised or that there is some improvement but not enough yet to put it at '*Not at Risk*', or more commonly, (2) that there is currently inadequate evidence to determine whether or not the water body is '*At Risk*' or '*Not at Risk*'. Review of the available evidence, and collection of new evidence is ongoing, so this number will reduce over time.

A further breakdown of water bodies per risk category is outlines in Table 5.

Figure 14: Water bodies identified as "At Risk" of not achieving their water quality objectives

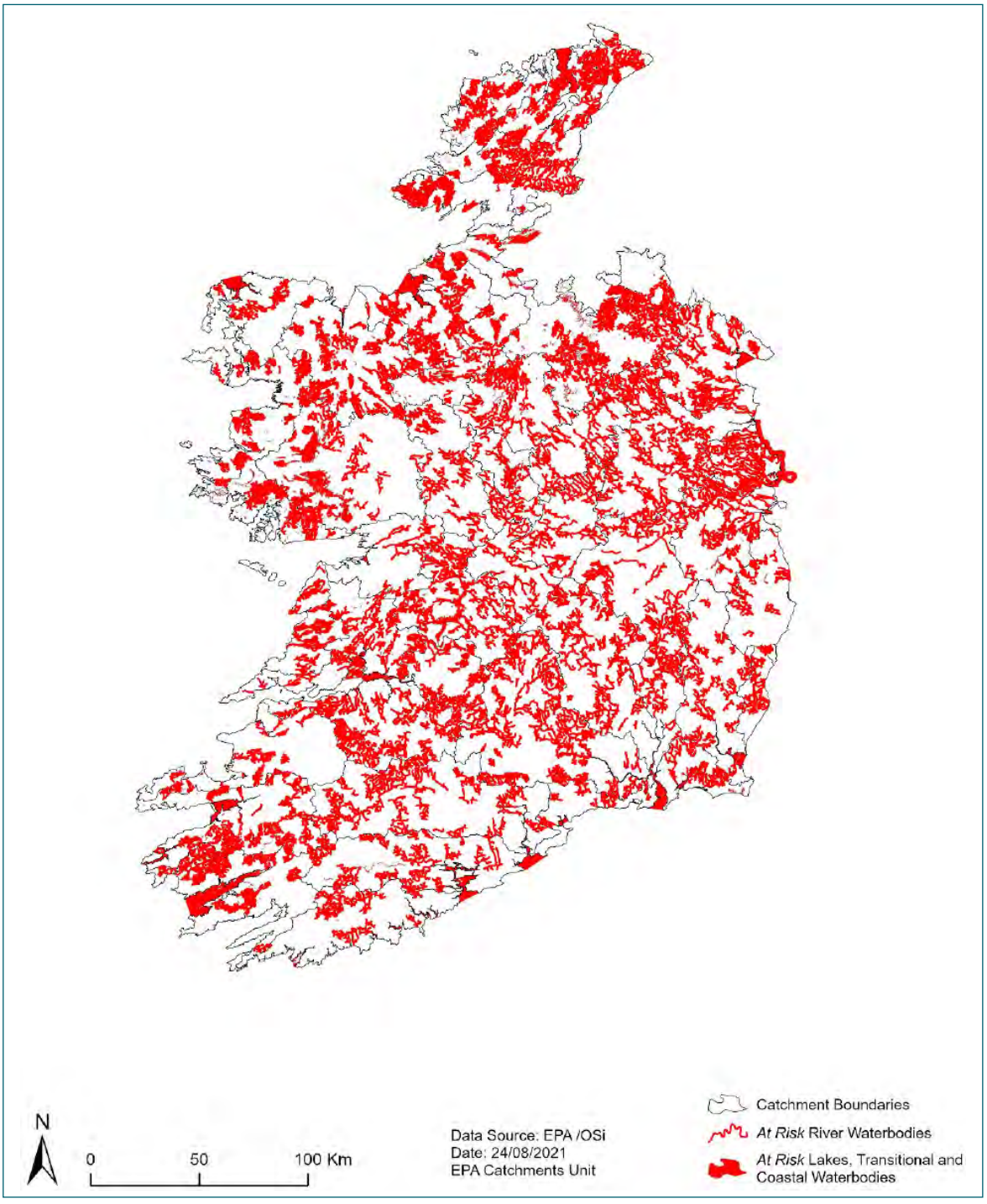
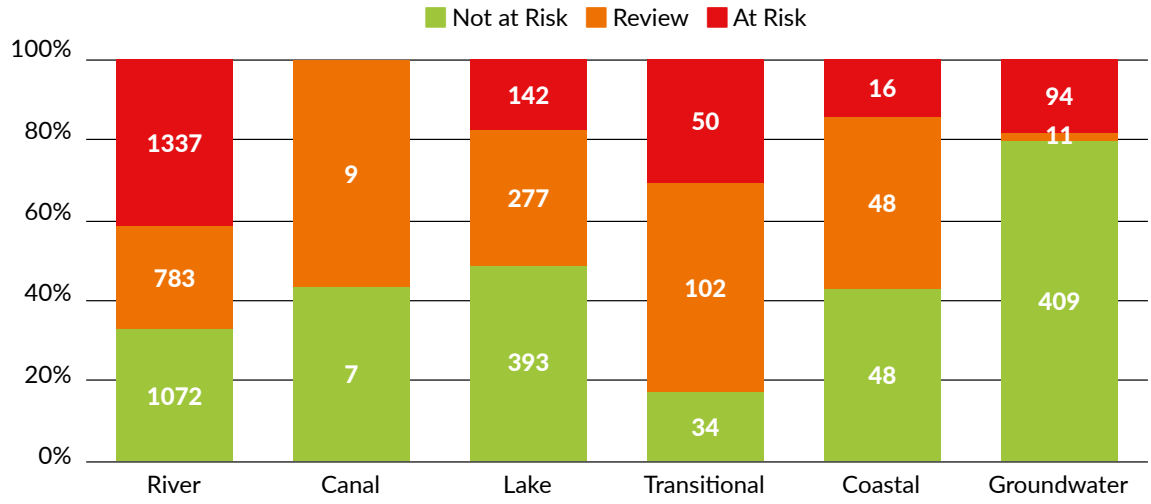


Table 5: Breakdown of Water Body Risk Categories

Water Body Type	Risk Categories			Total
	Not at Risk	Review	At Risk	
River	1,072	783	1,337	3,192
Canal	7	9	-	16
Lake	393	277	142	812
Transitional	34	102	60	196
Coastal	48	48	16	112
Groundwater	409	11	94	514
Grand Total	**1,963**	**1,230**	**1,649**	**4,842**

Figure 15: Breakdown of water body risk categories for each water body type



Significant Pressures

Having identified those water bodies '*At Risk*' of not meeting their environmental objectives, detailed assessments were undertaken to identify the significant pressures preventing the water bodies from achieving the required environmental objectives. Significant pressures are those that either cause or are likely to cause an unsatisfactory water body status and measures therefore need to be taken in order to mitigate the impact(s) of these pressures. These assessments are based on over 140 national datasets comprising information on pressures, impacts and physical settings and consider the linkages and dependencies between the sources of environmental pressures, and the pathways linking those pressures to the receptors, such as rivers, lakes or groundwater.

For the 1,649 '*At Risk*' water bodies the significant pressures have been broken down into 11 categories shown in Table 6, along with the number of water bodies in each water body by pressure type. The number of significant pressures impacting on water bodies is shown in Figure 16.

Of the 1,649 water bodies that are '*At Risk*', 46% are impacted by a single significant pressure, while the remaining 54% are impacted by more than one significant pressure. The outcomes of the assessment are summarised as follows:

Agriculture is the most common significant pressure impacting 1,023 water bodies, followed by pressures on hydromorphology (physical changes to habitat conditions) (448), forestry (216) and urban wastewater (197).

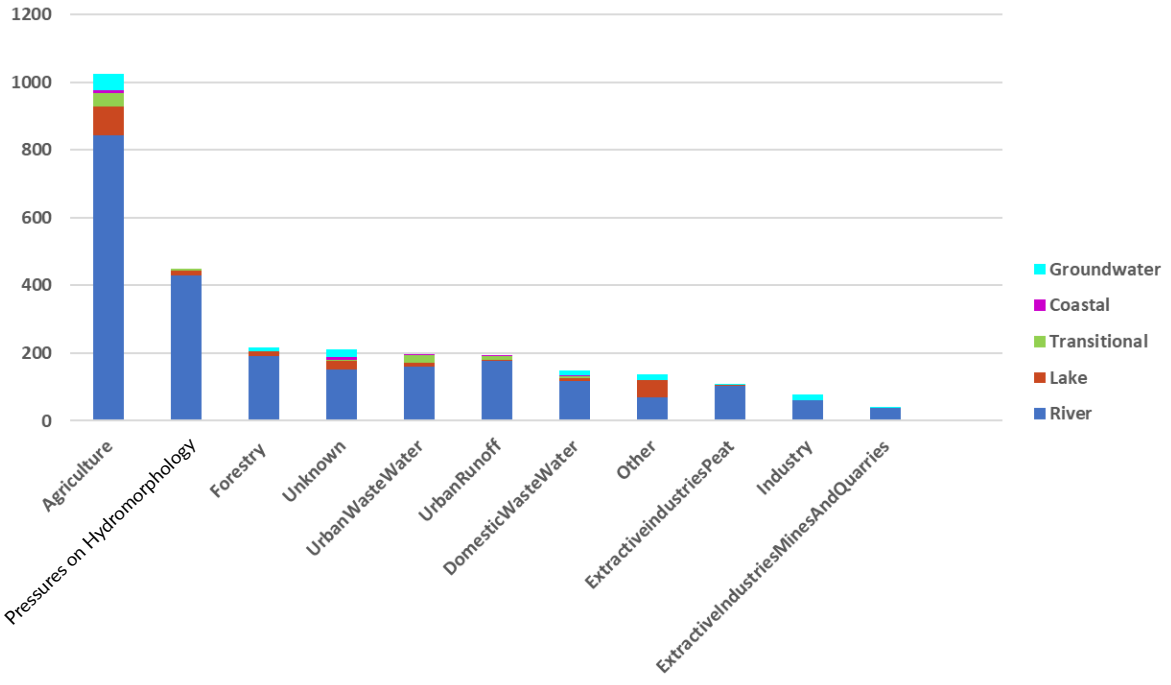
Since the last assessment, which was based on data up to and including 2018, there has been a slight reduction in the number of water bodies impacted by forestry, urban wastewater, domestic wastewater and industry, but little change in the other main pressure categories including agriculture, pressures on hydromorphology, peat, mines and quarries (Table 6). It must be noted that improvements in the assessment methodologies may have contributed to an apparent improvement in the impacts of domestic wastewater.

Table 6: Number of water bodies in each water body type per significant pressure category. (Note – Water Bodies may be impacted by more than one pressure)

Significant pressure category	Water body Type						Total	Previous assessment***
	River	Canal	Lake	Transitional	Coastal	Groundwater		
Agriculture	843	0	85	40	7	48	**1,023**	1,000
Pressures affecting Hydromorphology	428	0	15	5	0	0	**448**	442
Forestry	192	0	14	0	0	10	**216**	233
Urban Wastewater	161	0	10	22	4	0	**197**	208
Unknown*	151	0	26	4	6	25	**212**	164
Urban Run-off	177	0	3	10	4	0	**194**	196
Domestic Wastewater	117	0	9	6	3	13	**148**	188
Other**	69	0	50	2	0	15	**136**	139
Peat	103	0	2	0	0	1	**106**	106
Industry	61	0	1	0	0	17	**79**	89
Mines and Quarries	38	0	0	0	0	2	**40**	45

*Unknown is where there is a known impact but further investigation is required to identify the significant pressure.
**Includes a range of other smaller pressures such as aquaculture, historically polluted sites and invasive species.
*** The previous assessment was based on data from the period up to and including 2018.

Figure 16: Number of water bodies per significant pressure category.



Water quality and nutrient concentrations in Irish waters

In June 2023 the EPA published the report *Water Quality in 2022 – An Indicators Report* which provided an update on the water quality of Ireland's rivers, lakes, estuaries, coastal and groundwaters for 2022. The report stated that one of the most significant stressors on water quality and ecosystem health is high nutrient levels, such as nitrogen and phosphorous, which enter our waters as a result of human activities such as agriculture, wastewater and forestry.

The EPA's assessment shows no significant improvement nationally in the biological quality of rivers and lakes in 2022, which is largely attributable to excess nitrogen and phosphorous.

Overall, nitrogen levels in rivers and groundwater increased between 2021 and 2022, with nitrogen being too high in 40 percent of river sites and in 20 percent of estuarine and coastal water bodies. In addition, phosphorus levels were highlighted as being too high in 28 percent of rivers and 36 percent of lakes.



3

Setting Environmental Objectives

The key objectives of the WFD are set out in Article 4 of the Directive. It requires Member States to use their River Basin Management Plans and the associated programmes of measures to protect and, where necessary, restore water bodies in order to reach good status, and to prevent deterioration.

All of the basic measures will continue to apply and the supplementary measures[7] included in the second-cycle plan will continue during this plan, unless they reach a conclusion. This third plan also includes additional supplementary measures considered to be necessary, following local investigation, for the purpose of achieving the objectives of the Water Framework Directive.

Where the environmental objectives of good or better status for water bodies have not been achieved by the end of Cycle 2 the deadline has been extended to 2027. In these cases all necessary improvements in the status of bodies of water cannot reasonably be achieved within the timescales available. The grounds for these extensions include (1) the scale of improvements required can only be achieved in phases exceeding the timescale, for reasons of technical feasibility; (2) completing the improvements within the timescale would be disproportionately expensive; or (3) natural conditions do not allow for a timely improvement of the status of a body of water.

Analysis of the Gap to Achieving Water Framework Directive Environmental Objectives

The EPA has carried out an analysis of the likely water quality outcomes that may be achieved as a result of the measures outlined in the third-cycle River Basin Management Plan. The analysis forecasts the number of water bodies that are likely to achieve their 2027 status objectives, and those that are likely to show improvements, so that an assessment can be made of the gap to achieving Water Framework Directive (WFD) environmental objectives. The forecast analysis is a snapshot in time based on the best available information on the measures being implemented as at September 2023. It depends on assumptions being made about how the measures in the Plan will be implemented, for example, where measures are voluntary. Improved information on the measures being implemented will allow the forecasts to be further refined over time.

The 2021 characterisation assessment identified there were 2,610 water bodies, out of a total of 4,842 water bodies (54%), which had met their objectives. These water bodies require ongoing basic measures to protect water quality. Of the remainder, 1,649 (34% of the total) were categorised as being '*At Risk*' of not achieving their objectives and had evidence available to determine the water quality issue(s) and the pressure(s) that needs to be addressed. These water bodies are prioritised in the Plan for measures to restore water quality. The other 583 water bodies are in 'Review', which means additional evidence is required to confirm the nature of any water quality issues and the impacts from any relevant pressures.

This analysis highlights three types of gaps to achieving WFD water quality targets: the measures gap, the effectiveness gap, and the evidence gap.

1. The measures gap:

The measures gap applies where water bodies which are '*At Risk*' do not have specific, targeted measures, either in place or planned, to address the pressures by 2027. Of the 1,649 water bodies that are '*At Risk*', 864 (52%) are forecast to have not achieved the 2027 objectives due to this measures gap. The water body scale pressures without specific targeted measures include, for example, pressures on hydromorphology, urban-runoff pressures, urban wastewater and invasive species. **Note** that a water body can have more than one of these significant pressures.

2. The effectiveness gap:

The effectiveness gap occurs where a measure is planned, but it is not likely to be 100% effective to achieve the environmental objective in all water bodies where the pressure applies. This type of gap arises due to uncertainties about the level of uptake and implementation of the required measures, for example, where they are voluntary, or where there are other external factors governing their implementation.

The forecast for the effectiveness gap ranges from 0 to 690 '*At Risk*' water bodies, depending on the scenario and the assumptions about implementation that are selected. Five forecast scenarios were run based on a range of effectiveness rates from Low (10%) to 100%. Although there is a lack of information on the rate of effectiveness of many measure types, the medium (20%) and high (30%) effectiveness rates represent the most likely outcomes, based on the rates of improvements in water quality to date in response to the measures that are currently in place. These forecasts can be refined at the catchment scale as LAWPRO progress the development of the 46 Catchment Management Work Plans with the implementing bodies.

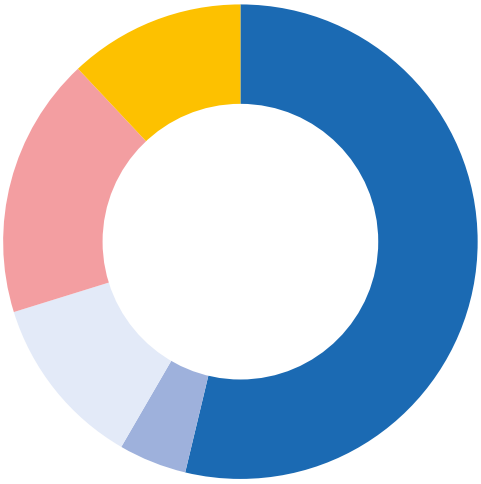
7 'Basic measures' are the minimum requirements to be complied with. 'Supplementary measures' are those measures designed and implemented in addition to the basic measures, with the aim of achieving the objectives of the WFD.

3. The evidence gap:

The evidence gap applies to the 583 water bodies (12%) which are in *'Review'* where further investigation is needed to confirm the water quality impacts, and the pressures, before the measures and their effectiveness can be assessed. The monitoring and assessment of the *'Review'* water bodies is on-going to gather the evidence to determine the impacts, pressures and measures.

The outcomes of this assessment are that out of the 1,649 *'At Risk'* water bodies that have not met their objectives, between 150 and 300 water bodies are likely to meet their water quality targets by 2027 as a result of the Programme of Measures. A further 500-650 water bodies will have specific, targeted measures planned and may see some water quality improvements, even if that is not to the level required to meet the status objectives. Therefore, a total of approximately 800 *'At Risk'* water bodies have the potential for some water quality improvements. Just over 850 water bodies (864) are unlikely to have specific, targeted measures at water body level planned, and are therefore very unlikely to achieve their status objectives by 2027. The remaining 2,610 water bodies, of the total of 4,842 water bodies, had met their objectives in 2021. The analysis does not forecast which water bodies may decline in quality over the period and no longer meet their objective.

Figure 17: Approximate proportion of water bodies that are forecast to have achieved their WFD objectives by 2027.



- Achieved objectives by 2021 (2,610 water bodies)
- Will likely achieve objectives by 2027 (150-300 water bodies)
- Measures in place by 2027, improvements unknown (effectiveness gap; 500-650 water bodies)
- Pressures known, measures not in place by 2027 (measures gap; 864 water bodies)
- Pressures not known (evidence gap; 583 water bodies)

Note, for categories for which a range is forecast, the midpoint of the range has been selected for chart display purposes; the range is noted in the legend.

These forecasts can be refined at the catchment scale as the proposed catchment management plans are rolled out. Tracking and reporting on progress with measures implementation will be important during the third-cycle, so that water quality outcomes of the measures can be assessed, and assumptions about the effectiveness of measures can be further refined.

Figure 18: Distance to Target

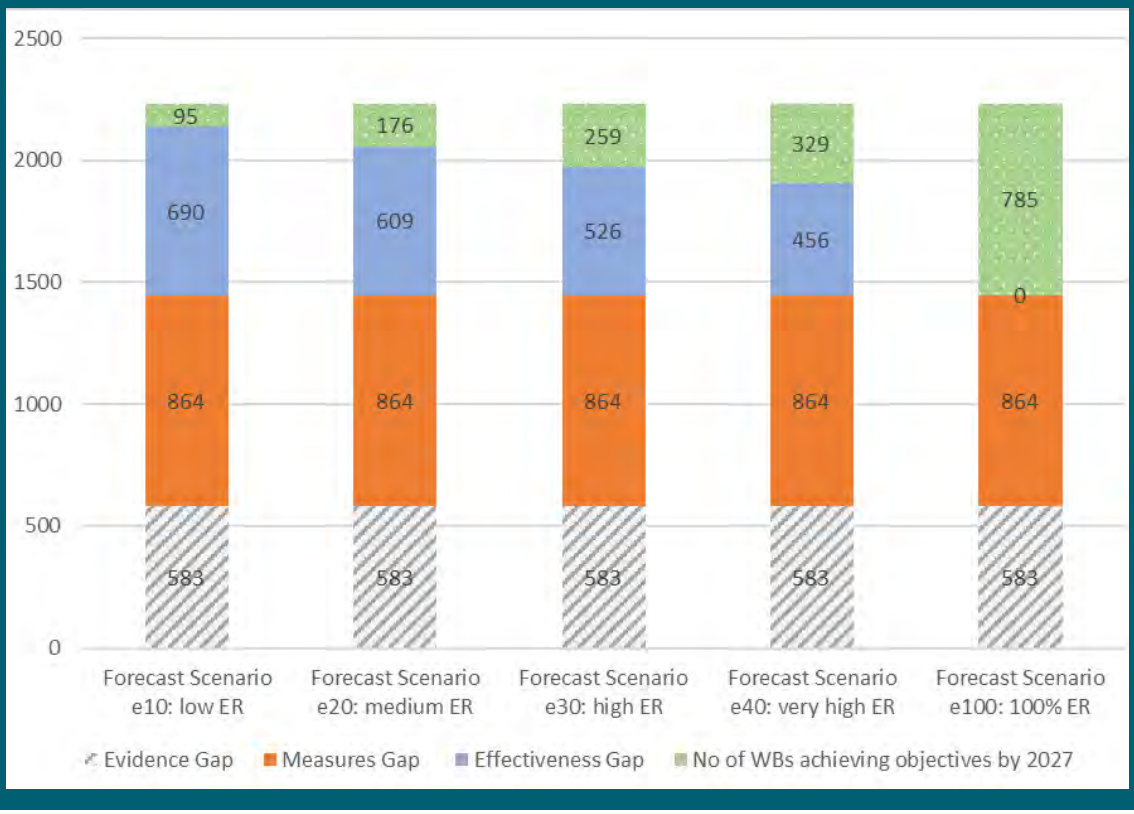
Distance to Target Analysis approach

A five-step framework has been developed by the EPA to assess what the actions in the plan are likely to achieve in terms of water body objectives by 2027, and what uncertainties may need to be reduced to strengthen the Programme of Measures. The detailed methodology and outcomes are contained in the EPA's background document "*Targeting Measures for Water Quality Outcomes - Analysis of the Gap to Achieving Water Framework Directive Environmental Objectives*".

1. Target	**Are the actions targeting the issues and pressures that are causing the problems?**
2. Plan	**Are the appropriate policies, programmes, guidance, etc. planned or in place?**
3. Act	**Are the required resources planned or in place for implementing bodies to undertake necessary activities?**
4. Do	**Are there sufficient planned or on-going actions to do work on the ground to get "the right measure in the right place"?**
5. Report	**Will data be collected and reported so the EPA can evaluate progress and water quality outcomes achieved?**

The 5-steps to implementing the right measure in the right place for water quality outcomes.

Figure 19: Scenario results based on Low, Medium, High, Very High and 100% effectiveness rates (ER).



Progress in achieving environmental objectives by the end of the second-cycle (2021)

On the basis of the actions adopted in Cycle 2, it was expected that general water-quality improvements would be achieved in the 726 water bodies prioritised for action during that planning cycle (2018–2021). However, given the complexities involved and the known difficulty in achieving status improvements due to time lags in natural recovery and the interaction between multiple environmental pressures on water bodies, it was conservatively estimated that the actions in the second RBMP would likely result in some 152 additional water bodies showing improvement in status by 2021, with further improvements being made thereafter.

In reality, as reported in Chapter 2, nationally there were improvements in status in 443 water bodies. However, this unfortunately was offset by declines in another 428 water bodies. Improvements and declines occurred across all significant pressure types resulting in little net change for any sector between the 2018 and 2021 assessments. The reasons for the declines are not known at this stage. Overall, therefore, there was only a net improvement in status for 15 water bodies.

However, it is notable that in a subset of 500 water bodies located in Priority Areas for Action (PAAs) where local actions were targeted, 314 water bodies remained stable in status. 118 water bodies improved in status while 68 water bodies declined in status. Overall, therefore, there was a greater net improvement in status of 50 water bodies compared to the national trend. This suggests that the targeted approach for actions at local level may be more effective, *albeit*, the performance of targeted actions needs to be significantly increased in the third-cycle.

What we want to achieve and the deadline of 2027

This plan must aim to achieve the objective of at least good water status for surface water bodies by defining and implementing the necessary measures within integrated programmes of measures. Where good water status already exists, it should be maintained. For groundwater, in addition to the requirements of good status, any significant and sustained upward trend in the concentration of any pollutant should be identified and reversed. For Ireland, this requires a programme of measures aimed at protecting and where necessary restoring each one of the 4,842 bodies of water so that they are at least reaching 'good' status or 'good' potential by 2027 (with some exemptions provided for, including time extensions and less stringent objectives). In the most recent assessment by the EPA, slightly more than half (54%) of Ireland's water bodies had met their mandatory environmental objectives in 2021, while the remainder need measures.

Where additional time is needed for water bodies to recover due to natural conditions the deadlines for achieving the environmental objectives can be extended beyond 2027 to allow for natural recovery following the implementation of measures (WFD Article 4(4)). The projected gap in achieving objectives by 2027 (moving from 54% compliance based on current conditions to 100% compliance) is extremely challenging. However, in keeping with the ambition of this plan the Government's objective will be to achieve as close to 100% of the water status objectives by 2027, as possible. Progress with the implementation of plan actions and the environmental objectives will be constantly monitored and reviewed in 2025.

It is unlikely that Ireland will achieve all of these objectives even with urgent, substantial and widely adopted measures. Measures have been put in place for all water bodies and a process has been initiated to put in place additional targeted mid-cycle measures, where necessary. Modelling and forecasting the effect of measures is challenging (especially for large-scale measures for diffuse pollution) in watercourses. There are many factors that will determine the speed and effectiveness of new mitigation measures such as the Water EIP project and national Barriers Mitigation Programme. Factors include, for example, technical capacity to deliver, time taken to complete statutory processes such as EIA, and recruitment of farmers into schemes. Reviewing progress will enable mitigation programmes to be assessed, modified and expanded to maximise the ambition for Cycle 3.

The necessary measures will be implemented, to the maximum extent possible, up to the end of 2027 and so it is expected that the improvements will only take place after 2027 and be measured during the next cycle monitoring programme. For these water bodies, the deadline will be extended to beyond 2027 to take account of the "natural conditions" and recovery processes as well as the monitoring process in the fourth-cycle (2027-2033). In addition, it is likely that the deadline for a proportion of water bodies to recover will need to be phased over a more sustainable timeframe of one or more river basin management cycles beyond 2027 because it would be technically infeasible and/or disproportionately expensive to achieve any sooner. Where it is clear that achievement of the environmental objectives by 2027 is not possible for these reasons these will be clearly identified and explained in accordance with Article 4(5) of the WFD in the fourth RBMP.

As stated, the Government's objective will be to achieve as close to 100% of the water status objectives by 2027, as possible. Progress with the implementation of planned actions and the environmental objectives will be constantly monitored and reviewed in 2025. The expected impact of the planned measures will be to improve 800 water bodies (49% of the 1,649 '*At Risk*' water bodies) in total. A conservative estimate suggests that of these 800 water bodies;

- 150 – 300 water bodies (or 9% - 18% of the 1,649 water bodies identified by the EPA as 'At Risk') will achieve their status objectives by 2027.
- 500 – 650 water bodies (or 30% - 39% of the 1,649 water bodies identified by the EPA as 'At Risk') are expected to show improvements in individual Quality Elements (QE) but not to fully achieve their environmental objectives by 2027 based on the current planned actions for Cycle 3.

Action 3.1: DHLGH will arrange for the development and application of a methodology for the screening and application of WFD Article 4(5) exemptions, extending the deadline for compliance beyond 2027, where justified in accordance with the strict criteria stipulated within the Directive.

Table 7: Summary of Environmental Objectives for the Plan

Total water bodies (Surface waters and groundwater)	4,842
Water bodies that achieved their environmental objectives by 2021	2,610 (54%)
Water bodies expected to achieve their environmental objectives by 2027 based on the current planned Actions for Cycle 3	2,760 – 2,910 (57% - 60% of all 4,842 water bodies) (This is equivalent to improvements in 150 – 300 WBs or 9% - 18% of the 1,649 water bodies identified by the EPA as 'At Risk')
Water bodies expected to show improvements in individual Quality Elements (QE) but not to fully achieve their environmental objectives by 2027 based on the current planned Actions for Cycle 3	500 – 650 water bodies (or 30% - 39% of the 1,649 water bodies identified by the EPA as 'At Risk')
Remaining water bodies that in the 4th cycle, will either; 1. require additional targeted actions during Cycle 3 with the aim of achieving their environmental objectives by 2027, or 2. require an extension of time beyond 2027 due to the impact of 'natural conditions' on the rate of recovery, or 3. require a phased recovery over a more sustainable timeframe of one or more river basin management cycles beyond 2027 because it would be technically infeasible and/or disproportionately expensive to achieve any sooner. (**Note:** this will be the subject of the interim review of progress in 2025)	1,932 - 2,082 (40 - 43% of all 4,842 water bodies)
Less Stringent Objectives	9 (related to historic mines)

*Good Status = Good ecological status/potential or better and good chemical status

According to the EPA, the principal causes of the decline in Ireland's water quality are the losses of excess nutrients (nitrogen and phosphorous) and sediment from farmland, forestry, inadequately treated wastewater, and physical impacts to habitat conditions in water bodies (for example, the interruption of river continuity due to river barriers, and drainage of lands and channelisation of rivers). Climate change and population growth are adding to the pressures on water resources and water services infrastructure. In many cases, specific and targeted action is now needed to protect water from further decline and to restore water quality where past activities have caused damage.

Much has been achieved during the second river basin planning cycle. In particular, the new governance and implementation structures have been maturing and will continue to evolve over the third-cycle. The establishment of Uisce Éireann, An Fóram Uisce, the Local Authority Waters Programme (LAWPRO) and the Agricultural Sustainability Support and Advisory Programme (ASSAP), represented innovative and significant steps forward in water management in Ireland. These enhanced arrangements will continue to strengthen over time as experience grows and needs change, with further improvements to the operation of these planned under the third-cycle and in the long-term. Furthermore, the research programmes led by the Institute of Public Administration (IPA) in relation to water governance and the Economic and Social Research Institute (ESRI) in relation to the impact of river basin management strategies on human attitudes and behaviours will help to draw lessons from our experience of implementation. This will inform the future evolution of water governance structures and the implementation of measures for the protection of waters.

A new enhanced legal regime for water abstractions (the Water Environment (Abstractions and Associated Impoundments) Act 2022) was signed into law by the President in December 2022, introducing controls and prior authorisation for abstractions and associated impoundments, via a licensing regime for environmentally significant abstractions. This regime will contribute to the achievement of the environmental objectives for our water bodies by mitigating the pressure from abstractions on our water environment.

All registered abstractions and associated water bodies will also be assessed to determine if they are meeting WFD objectives under Article (4). Some of these existing abstractions may be causing water bodies to not meet default WFD objectives but will need to be maintained because there are no alternative sources and due to the overriding public interest of the provision of drinking water. In these instances, the setting of alternative objectives under Article (4) may be required to be applied. Several processes are underway which will inform the extent to which exemptions may be required for water bodies impacted by abstractions. These include the abstraction licensing process, the review of the heavily modified water body designation process, and the National Water Resources Plan.

DHLGH is preparing a proposal for enacting abstraction regulations. The target is the end of Q3, 2024. (See 'Other Pressures' Action 1 in the Programme of Measures)

Despite the fundamental changes made to the river basin management approach in Ireland, progress in restoring impacted waters and protecting waters from deterioration has been slow. This is due, in part, to the relatively short period for the outcomes of the second-cycle programme of measures to be reflected in the monitoring data, which was not helped by the interruptions due to Covid-19.

While existing water protection measures must continue to be implemented and accelerated, it is clear that new targeted and effective measures are also necessary. Many of these measures will deliver co-benefits for climate mitigation and will help to enhance biodiversity. Implementing these policies will require ongoing and adequate financing, resources and must be fully integrated across sectoral areas especially into land use management and in agriculture. This work will be reinforced by collaborative participation of stakeholders at national, regional and sectoral levels.

Specific Environmental Objectives for water bodies

Further information on specific environmental objectives for water bodies will be made available at the website www.catchments.ie. This is a collaboration between the Department of Housing, Local Government and Heritage, the EPA and LAWPRO. The website provides substantial background information and data is available on each of the 46 catchments, 583 sub-catchments and 4,842 water bodies. Regular updates and information will be made available in support of the implementation of this plan, including up-to-date information on the status of each water body and the environmental pressures they are subject to, alongside specific catchment and sub-catchment assessments.

Less Stringent Objectives

A less stringent objective exemption (Article 4(5)) allows member states to determine that '*Good Status*' will not be achieved under any time scales, for reasons of technical feasibility and/or disproportionate costs. Article 4(5) has been

applied to nine water bodies (seven river and two groundwater bodies) that are impacted by historic mines at Avoca and Silvermines. Mitigation of these pressures is known to be technically very difficult, time consuming, costly and for parts of the pressures in both cases, technically infeasible.

Seven of these water bodies are achieving their less stringent objective, whereas two water bodies have deteriorated since the 2010-2015 cycle period and are now no longer achieving their less stringent objective of '*Moderate*' ecological status.

New modifications to surface water bodies & groundwater levels and new sustainable human development activities

Article 4(7) states that Member States will not be in breach of the Directive where (1) failure to achieve good groundwater status, good ecological status, or, where relevant, good ecological potential or to prevent deterioration in the status of a body of surface water or groundwater is the result of new modifications to the physical characteristics of a surface water body or alterations to the level of bodies of groundwater, or (2) failure to prevent deterioration from high status to good status of a body of surface water is the result of new sustainable human development activities. This is provided that four conditions are met, i.e. all practicable steps are taken to mitigate the impacts; the reasons for the modifications and alterations are clearly set out in the RBMP; the reasons are of overriding public interest and benefits outweigh the environmental outcomes; and the benefits cannot be achieved by other means for reasons of technical feasibility or disproportionate cost.

The WFD 2000/60/EC is given general effect in planning legislation as specified in Section 1(A) of the *Planning and Development Act 2000*, as amended. 2010 planning legislation has also improved how water management and the planning system are integrated by requiring development plans to support the protection and enhancement of water quality, particularly with regard to securing the objectives of the RBMPs. The legislation also required that the location of new development should be linked to existing wastewater treatment capacity and planned investment in capacity in the future. However, enhanced clarity was needed with respect to the practical steps, approaches and methodologies to be employed by the relevant authorities to give effect to these requirements.

DHLGH has developed detailed draft guidance to assist planners in their role, and also to assist developers and other stakeholders in making appropriate applications for planning permission. The new draft guidance provides for a formal assessment of proposed new developments for the application of Article 4(7) exemptions and for a decision making process.

The impacts of Climate Change on river basin environmental objectives

While water is at the heart of adaptation to climate change, serving as the crucial link between the climate system, human society and the environment, it is a finite and irreplaceable resource. Only if well managed is water renewable. Managed efficiently, water can play a key role in strengthening the resilience of social, economic and environmental systems.

The hazards arising from a rapidly changing climate include water-related issues: extreme precipitation including cloudburst events; flooding (coastal, fluvial, pluvial and groundwater) and water stress and drought.

As we aim to achieve and maintain '*Good Status*' or better for all our water bodies, new challenges in the form of impacts from climate change will emerge which will complicate the achievement of that objective. As outlined in the latest United Nations Intergovernmental Panel on Climate Change (IPCC) Report, climate change is already affecting every region on Earth, in multiple ways. But it not just about temperature. Climate change is bringing multiple different challenges – which will all increase with further warming. These include changes to wetness and dryness, to winds, snow and ice, coastal areas and oceans. In terms of water, while Ireland has abundant water resources, the impacts of climate change are already being felt and are expected to continue and intensify in the years and decades to come. This is in addition to the increasing demand on our water resources from population change and an economy which is expected to grow strongly over the coming years.

As seen in some of the responses to the consultation on the Significant Water Management Issues, while acknowledged as a significant issue, climate change should be considered one of the drivers of environmental factors that impact on water quality and quantity as opposed to a significant management issue itself.

An assessment of key future climate risks to the water quality and water services sectors is outlined in the Government's Climate Change Sectoral Adaptation Plan for the Water Quality and Water Services Infrastructure. Published by DHLGH in October 2019, the plan marked an important first step in climate change adaptation planning for Ireland's water industry, bringing together multiple sectors to develop a set of priority actions and adaptive

measures. The assessment showed that Ireland's future climate is expected to witness;

- Increasing temperature resulting in more heatwaves, more drought and fewer frost days
- Changes in precipitation levels, intensity and distribution (drier summers, wetter winters)
- Increase in intensity of storm events (including heavy precipitation, wind, hail, lightning)
- Increasing sea level rise and storm surge levels.

The challenges faced by water quality and water services Infrastructure due to this projected change in climate include;

Water Quality Impacts

- High rainfall and flooding leading to mobilisation of pollutants
- Reduced dilution of contaminants in water bodies at low flow
- Drying of peatland resulting in the reduction of natural filtration of pollutants
- Increased spread and viability of pathogens, such as livestock waste and slurry
- Changes in the distribution and viability of native, non-native and invasive flora and fauna

Water Services Infrastructure Impacts

- Increased surface and sewer flooding leading to pollution, water and wastewater service interruptions.
- Reduced availability of water resources.
- Hot weather increasing the demand for water.
- Increased drawdown from reservoirs in the autumn/winter to provide greater flood capacity, leading to resource management issues.
- Business continuity impacts or interruptions for water services providers.

The plan also outlines the adaptive measures available to build resilience to the effects of climate change and weather related events, and other Socio-Economic developments in both sectors. Many of the adaptation measures identified in the plan, which should be considered by organisations and stakeholders in their plan making processes, are already underway.

As a result of the potential impacts of climate change on water resources, the planning for droughts and water scarcity is increasingly crucial. In this regard Uisce Éireann has developed the National Water Resources Plan (NWRP). The NWRP outlines how Uisce Éireann will move towards a safe, secure, reliable and sustainable public water supply over a 25-year timeframe. Enabling Uisce Éireann to transform our water supplies at a national level, the plan will look for resilient solutions across all of our water supplies in terms of reducing leakage (lose less), promoting water conservation (use less) and developing resilient supplies (supply smarter).

To ensure our water resources remain resilient to the effects of climate change, they will also require investment. Supported through our National Development Plan, Ireland is currently providing an investment of approximately €12 billion in public water and wastewater infrastructure over a ten-year period up to 2027.

Critical to helping to improve the understanding of climate change impacts and the development of appropriate measures and solutions is research and innovation. For example, recent research carried out by the EPA (High-resolution Climate Projections for Ireland[8]) that attempts to localise global and regional climate models into a high resolution prediction for Ireland (at 4km grid resolution), will be an important input into our future policy work and identification of appropriate measures. A large-scale, EPA-funded research project called WaterFutures, which is being led by UCD, is also underway to examine how climate change is likely to affect Irish catchments and what the implications are for measures to protect water quality.

Geological Survey Ireland has installed a groundwater monitoring network that is designed to monitor climate change impacts on groundwater. The network comprises 20 locations specifically for groundwater flooding (turloughs of issue) and 13 groundwater borehole locations for both flooding and drought impacts. This information will help to identify more resilient or susceptible groundwater systems that can inform future sustainable abstractions (e.g. for drinking water), management of susceptible groundwater dependent ecosystems, and support better planning decisions (e.g., highlight likely groundwater flooding). The network will be increased by an additional c.20 boreholes by 2028. The network is complementary to the EPA's borehole network, which was designed for WFD monitoring rather than climate change purposes.

In terms of the programme of measures for the third-cycle plan, there is a need to consider the

8 (High-resolution Climate Projections for Ireland – A Multi-model Ensemble Approach by Dr Paul Nolan & Dr Jason Flanagan http://www.epa.ie/pubs/reports/research/climate/researchreport339/)

possible effects of climate change when selecting and implementing measures. These measures will need to be resilient to climate change impacts, especially expensive and long-term investments such as large infrastructure projects. In addition, the River Basin Management Plan seeks to promote nature-based solutions wherever possible, both in the rural and urban setting.

As a result, a simplified climate change sensitivity analysis or "climate check" will be undertaken in line with EU Guidance during the third RBMP cycle. This will apply for all planned measures carried out under this plan to test their ability to perform under future climate conditions. This analysis will be undertaken at the level of the Catchment Management Work Plans and Sectoral Action Work Plans where the details of measures will become clearer. This is to ensure that the actions selected are effective, sustainable and cost efficient under changing conditions. The sensitivity analysis will also inform the setting of RBMP environmental objectives for the following Cycle 4.

Action 3.2: DHLGH will review and update the Climate Adaptation Plan for the Water Quality and Water Infrastructure Sectors (Timeline: 2024).

Action 3.3: LAWPRO will co-ordinate a simplified climate change sensitivity analysis or "climate check" which will be undertaken in line with EU Guidance during the third RBMP cycle at the level of Catchment Management Work Plans. The check will also inform the setting of RBMP environmental objectives for the following fourth-cycle. (Timeline: 2025).

Action 3.4: The EPA will review the national monitoring programme and integrate climate change considerations such as identifying water bodies likely to be most vulnerable to climate change and detecting the direct impacts of climate change. (Timeline: 2026).

Action 3.5: Support additional research and pilot projects in the area of climate change (impacts and adaptation). (Timeline: 2027)

Environmental Objectives for Protected Areas

Protected areas are areas that have been designated as requiring special protection because of their particular importance. The Water Framework Directive requires that, where more than one water status objective relates to a water body, the most stringent must apply. The protected areas include bathing waters, sources of drinking water, areas in which shellfish are grown or harvested, locations with sensitive habitats and species, or areas that are particularly affected by eutrophication due to excessive inputs of phosphorus and/or nitrogen from urban wastewater. Maps identifying the location of each of these areas are available online at www.catchments.ie. The water-related condition of these protected areas is set out below.

Bathing Waters

Designated bathing waters are designated where the local authority expects a large number of people to bathe.

Assessed under the 2008 Bathing Water Quality Regulations, the latest published Bathing Water Quality Report for 2022 identified 148 bathing waters across Ireland, an increase from 135 in 2011. 97% (144) of these met or exceeded the minimum required standard of 'Sufficient', with 92% (137) of bathing waters classified as either 'Excellent' or 'Good'. Only 3 bathing waters were classified as 'Poor'.

While improvements are continuing to be seen year on year, work is still required to ensure that issues at those bathing waters not meeting the required standard are addressed. Agriculture, urban wastewater and fouling from dogs on beaches all impacted on the quality of bathing waters. In terms of '*Poor*' bathing waters, the pressures found to be impacting on these waters included urban wastewater, contaminated surface water streams and issues with faeces from dogs, birds and other animals.

Wild and open water swimming has enjoyed a surge in popularity in recent years. This increased interest has resulted in requests from some members of the public to extend the officially designated bathing season from the current dates of 01 June to 15 September.

In Ireland, the risk of illness from bathing between June and September is lower than other times of the year as bacteria is more likely to be killed by exposure to sunlight (higher intensity ultra-violet light) during this period, when compared to other times of the year. University College Cork is completing a research study on 'out of season' bathing on behalf of the National Bathing Water Expert Group. The findings

of this study will be used to inform 'out of season' bathing policy development to best protect bathers' health.

Action 3.6: The National Bathing Water Expert Group to undertake a research project to determine the most suitable approach to protecting bathers' health outside of the current bathing season.

Action 3.7: DHLGH will amend the existing Bathing Water Regulations (S.I. No. 79 of 2008) to facilitate local authorities defining the length of the "bathing season" on determining the bathing season for individual bathing waters in respect of the "bathing waters" within their jurisdiction. DHLGH will also consider the research outcomes and recommendations from the National Bathing Water Expert Group. The outcome of the EU regulatory fitness and performance programme (REFIT) review of the Bathing Water Directive will be assessed in due course.

Drinking Water Protected Areas

The WFD requires the identification of Drinking Water Protected Areas (DWPAs). These are surface waters and groundwater bodies from which water is abstracted for people to drink. In most cases this raw water is treated to the required drinking water standards.

The EPA reports on the quality of drinking water across >1,100 Public Water Supplies (Irish Water Supplies and Public Group Schemes) and >2,000 Private Water Supplies (Private Group Schemes and Small Private Supplies) for 2022, highlighted that 99.99% of samples in public supplies, while 95.5% of samples in small private supplies and 95.9% in private group schemes, were free of E. Coli, an indicator of pollution in the water supply and a harmful bacteria. However, in 2022, 14 private supplies, supplying over 5,500 people, failed the standard for E. Coli, showing 1 in 30 supplies failed to reach the standard, compared to 1 in 734 public supplies that failed to do so.

17 public supplies had samples that failed the pesticides standard. The main contaminant found was MCPA (2-methyl-4-chlorophenoxyacetic acid), a widely utilised herbicide that is used for rush control in grassland and for other weed control purposes.

45 public supplies and 16 public group schemes had samples exceeding the trihalomethanes (THMs) standard. THMs are chemical compounds that can occur when chlorine, which is used to disinfect the water, reacts with natural organic matter in the water.

Overall, the 2022 reports found that the quality of drinking water from public supplies remains very high, with over 99.7% of samples compliant with bacterial and chemical limits. Private supplies show lower levels of compliance and require further improvement in places.

Shellfish Waters

Although the Shellfish Waters Directive (SWD) has been superseded, the areas used for the production of shellfish that were designated under the SWD remain protected under the WFD as 'areas designated for the protection of economically significant aquatic species'. The requirement from a WFD perspective is to ensure that water quality does not impact on the quality of shellfish produced for human consumption. In Ireland, 64 areas have been designated as shellfish waters (S.I. No. 268 of 2006, S.I. No. 55 of 2009, S.I. 464 of 2009).

Water bodies containing designated shellfish waters are considered to be meeting their Protected Area objectives where a water quality parameter is below the concentrations given in the Regulations or where there is at least 75% compliance with the microbial guide value for shellfish based on quarterly sampling. Assessed by the Marine Institute, the average dissolved concentrations for metals in shellfish waters for the period 2016-2019 all complied with the environmental quality standards. In terms of the microbial quality in shellfish flesh against the guide E. coli value, the Marine Institute's assessment for 2018 indicated that 82.5% of shellfish waters were compliant. This was an improvement from 75% in 2015.

Water Dependent Habitats and Species

Many of the habitats and species listed for protection in both the Birds and Habitats Directives are water dependent. In total, approximately 88% or 385 of the 439 Special Areas of Conservation (SACs) have water dependent habitats or species, with 90% or 149 of the 165 Special Protection Areas (SPAs) having water dependent bird species.

While maintenance and restoration of these features to favourable conservation status is the responsibility of the National Parks and Wildlife Service, according to their obligations under the Habitats Directive, other consent and regulatory bodies also have statutory obligations to adhere to the requirements of the Habitats and Birds Directives. Under the second RBMP (2016-2021), water bodies have been assessed for their ecological status, which indicates the quality of the structure and functioning of an aquatic ecosystem.

Good ecological status of a surface water body indicates that the structure and functioning of an

aquatic ecosystem is in a favourable condition. However, species such as the Freshwater Pearl Mussel (FPM) have a complicated life-cycle, and are influenced by a variety of biological and environmental processes that cannot be explained by water quality alone.

Accordingly, the freshwater pearl mussel has additional requirements for supporting conditions, which are set out in the Freshwater Pearl Mussel Regulations (S.I. No 296 of 2009) and described in the relevant site-specific conservation objectives for the Special Area of Conservation (SAC) in question. The water-related requirements of water-dependant habitats and species, more generally, will be reviewed during the third RBMP cycle, taking account of the most recent scientific evidence and conservation measures implemented. If necessary, proposals for updating appropriate and relevant standards will also be considered. Results of the overall assessment are outlined in Table 8.

In addition to this, an assessment of the 97 river water bodies with designated FPM habitats finds that 20 (20.6%) had achieved the required water quality standards for the supporting conditions as set out in the 2009 FPM Regulations.

Action 3.8: The water-related requirements of water-dependant habitats and species will be reviewed by the Water Division, the National Parks and Wildlife Service and the EPA during the third RBMP cycle, taking account of the most recent scientific evidence. If necessary, proposals for updating the related water standards will be made and this will be integrated into the catchment management process.

Action 3.9: The National Parks and Wildlife Service and the Water Division, both of this Department, and other relevant stakeholders will continue to engage closely in the catchment management planning process as it relates to Freshwater Pearl Mussel to ensure conformity with the requirements of the Habitats Directive and the Water Framework Directive.

Nutrient Sensitive Areas

EU member states are required under the Urban Wastewater Treatment Directive (91/271/EEC) to identify nutrient-sensitive areas. These have been defined as *"natural freshwater lakes, other freshwater bodies, estuaries and coastal waters which are found to be eutrophic or which in the near future may become eutrophic if protective action is not taken".*

The EPA recently carried out a review of nutrient sensitive areas downstream of large urban wastewater discharges, with 76 wastewater discharges identified for assessment. On completion, a total of 66 areas downstream of 51 of these discharges were identified as nutrient sensitive. This is an increase from the previous assessment in 2016, which identified 64 nutrient sensitive areas downstream of 48 discharges.

Once a nutrient sensitive area is identified, additional nutrient removal must be applied (if not already applied) to wastewater treatment plants discharging to the sensitive area. 45 of the 51 discharges have nutrient removal in place.

Table 8: Assessment of whether the supporting water conditions are sufficient to support the structure and functioning of an aquatic ecosystem necessary for protected water dependent habitats and species. That is, the water objectives set out for the freshwater pearl mussel (S.I. No 296 of 2009) and Good Ecological Status in the case of all other protected water dependent habitats and species

Water Body Type	Total No.	Meeting the Requirements	Did not meet the Requirements	Unknown*
Lakes	435	407 (93.6%)	28 (6.4%)	0 (0%)
Rivers	1,199	669 (55.8%)	523 (43.6%)	7 (0.6%)
Transitional and Coastal	144	69 (47.9%)	50 (34.7%)	25 (17.4%)

*Information not available.

Environmental Objectives for water bodies designated as Artificial or Heavily Modified water bodies

Artificial water bodies

Artificial water bodies are surface water bodies which have been created in a location where no water body existed before, and which have not been created by the physical alteration, movement or realignment of an existing water body. There are 16 artificial water bodies at present, all of which are canals. 15 canal water bodies are at '*Good*' ecological potential based on the latest water quality assessment to 2021. The Shannon-Erne canal is at '*Moderate*' status which has improved from '*Poor*' status at the previous assessment. Canals are monitored and managed by Waterways Ireland.

Heavily modified water bodies

Heavily modified water bodies are natural bodies of water which have been substantially changed in physical character as a result of alterations by human activity for the purposes of a specified use. In this context, physical alterations mean changes to the hydromorphology of the water body, for example, the size, slope, form, shape and function of a river bed and its banks, and its flow or water level regime. The specified uses include water storage and regulation for drinking supply and power generation, navigation, flood protection, drainage for protection of agricultural lands, and urban development.

In heavily modified water bodies the hydromorphological or physical character of the water body cannot be restored sufficiently to support Ecological Status, without impacting on the specified use. As a result, these water bodies are set an alternative environmental objective of '*Good Ecological Potential*', this is the best ecological condition they can achieve allowing for the fact that their hydromorphology has been modified to facilitate the specified use.

However, heavily modified water bodies are still expected to meet the required standards for all the other water quality elements, such as physico-chemical conditions, nutrients, specified pollutants and chemicals. Typically, the ecology of a HMWB is altered because the physical habitat has changed significantly. For example, where a significant impoundment is constructed on a river the habitat upstream can be more similar to a lake or a pond. Therefore, the ecology changes in response. Measures are also required to mitigate the impacts on hydromorphology to the greatest extent possible given the specified use.

In the first and second-cycle river basin management plans, there were 33 water bodies designated as heavily modified based on the limited available information at the time (see Table 9). These included 4 river water bodies used for water storage and flood protection; 16 lakes used for water supply and power generation; and 12 transitional and coastal waters modified for urban development and ports or harbours. Of these, 7 have achieved '*Good Ecological Potential*', 14 required additional measures, and there are insufficient monitoring data available to determine the condition of the remaining 12 water bodies.

Review of the heavily modified water body designations

The EPA has carried out a technical review of heavily modified water body designations based on improved methods of assessment and increased information and knowledge. 2,392 water bodies were considered by the EPA where *specified uses* are present. Through the application of the characterisation tests this was reduced to 466 proposed candidate heavily modified water bodies ('HMWB') (see Appendix 05). This includes 32 of the 33 HMWBs originally designated during Cycle 1 of river basin planning. One existing HMWB is proposed to be de-designated as it no longer meets the criteria for heavily modified. This is the Bregagh River in Kilkenny.

Table 9: Condition of the second-cycle heavily modified water bodies based on the 2016-2021 monitoring data

Water body type	At Good Ecological Potential	Less than Good Ecological Potential	No monitoring data	Total
River	1	3	0	**4**
Lake	11	9	0	**20**
Transitional and Coastal	2	5	2	**9**
Total	**14**	**17**	**2**	**33**

Five specified water uses were assessed in the review. These are:

- Water Storage & Regulation (rivers and lakes)
- Flood Protection (rivers)
- Urban land use (rivers and transitional waters)
- Navigation (navigable river and ports in transitional waters)
- Arterial drainage (rivers)

Following the technical review by the EPA which identified 466 potential candidates for designation, a ten week public consultation took place in March 2022. The EPA published a summary report based on the twenty submissions and made a number of recommendations to the Minister for Housing, Local Government and Heritage.[9]

DHLGH has examined the recommendations of the EPA HMWB review, particularly the steps involved in deciding whether designation as a Heavily Modified Water Body (HMWB) is appropriate (Steps 7 to 9).

The EPA recommendations to the Minister were as follows;

a. The EPA would recommend that DHLGH carry out a wider national policy review of whether the specified uses are appropriate during the 3rd river basin management planning cycle.

b. We recommend that water body specific designation tests, that are informed by the policy review, should be carried out in due course. Such assessments may be best carried out when there is more detailed water body specific information available, noting that designations can be reviewed with each RBMP cycle.

c. A key consideration for the Agency is that there may be implications for abstraction licensing if water bodies with abstractions and associated significant impoundments are not designated as heavily modified and listed in the river basin management plan. This may make it difficult to license these abstractions where Good Ecological Status cannot be achieved. This concern was also raised by Irish Water *(now Uisce Éireann)* in our discussions with them during the review process. This point supports early designation of these candidate heavily modified water bodies.

Action 3.10: The Minister for Housing, Local Government and Heritage will undertake a short public consultation before deciding whether to designate or de-designate water bodies as HMWBs. There were 466 water bodies, which the EPA has found to meet the criteria for designation. The Minister will take into account the recommendations of the EPA and the key concerns raised in the submissions to the consultation process.

The current policies in relation to specified uses is relevant to the decision, these are summarised below:

Water Storage & Regulation for the purpose of Water Supply and Hydropower – Maintaining existing impoundments for water supply is an important component of the Governments policy to ensure security of water supplies. Hydropower, while a small element of the Governments policy for renewable electricity, is nevertheless an important part of the mix of electricity generation sources and is important for overall grid stability and security.

Structural Flood Protection – the current policy in relation to flood protection is to implement the Floods Directive in full. This includes structural flood protection measures proposed for communities at significant flood risk, aimed at reducing the likelihood and/or degree of flooding, identified through the National Catchment Flood Risk Assessment and Management (CFRAM) Programme.

Urban Land Use – policy in relation to the impact of urban development on water is set out in the National Planning Framework (2018) under National Objective 57, which is to;

- Enhance water quality and resource management by ensuring flood risk management informs place-making by avoiding inappropriate development in areas at risk of flooding in accordance with The Planning System and Flood Risk Management Guidelines for Planning Authorities.
- Ensuring that River Basin Management Plan objectives are fully considered throughout the physical planning process.
- Integrating sustainable water management solutions, such as Sustainable Urban Drainage (SUDS), non-porous surfacing and green roofs, to create safe places.

There is a priority in flood risk management to protect existing urban infrastructure and properties while mandating the incorporation of sustainable water management solutions within the constraints of urban areas. This is fully compatible with the designation of HMWBs in urbanised catchments.

9 Monitoring & Assessment: Freshwater & Marine Publications. Environmental Protection Agency (epa.ie)

Navigation (Inland navigable channels and coastal ports & navigation) – policy in relation to inland navigable channels in natural waters is set out in the National Planning Framework (2018). This includes the development of Blueways, which in turn involves the management, maintenance, development and restoration of specified inland navigable waterways, principally for recreational purposes led by Waterways Ireland.

Policy in relation to coastal ports and navigation are set out in the National Planning Framework (2018), which states that "Ireland's port and shipping services play an important role as enablers of economic growth. Irish ports are critical infrastructure for international trade, with over 90% of our international trade moving by sea. Ports also serve as logistics and distribution hubs." More recently, certain ports will play an important role in supporting the development and deployment of offshore renewable energy. The maintenance and sustainable growth of this infrastructure is a Government priority.

Arterial drainage – The Arterial Drainage Act (1945) is the primary policy instrument governing arterial drainage and is implemented by the Office of Public Works. The original purpose of the schemes carried out under the Act was to drain lands to improve agricultural production. The Arterial Drainage Maintenance service has developed and adheres to a suite of Environmental Management Protocols and Standard Operating Procedures, which minimise the potential environmental impact of operations. However, the future of arterial drainage policy now needs to be reviewed to enhance and update policy in this area. This is particularly pertinent to a number of cross cutting environmental objectives, including those of the Climate Action Plans, the WFD River Basin Management Plan and the National Biodiversity Action Plan.

The Government has mandated a national Land Use Review, which will trigger a review of future drainage needs and practices. The review is led jointly by the Department of Environment, Climate and Communications, the Department of Agriculture, Food and the Marine and the Department of Housing, Local Government and Heritage. The objective of the review is to;

> *"…undertake a national land-use review, including farmland, forests and peatlands, so that optimal land-use options inform all relevant government decisions."*

Also;

> *"The review will balance environmental, social and economic considerations and involve a process of evaluation of the ecological characteristics of the land. It will include consideration of emissions to air and water, carbon sequestration and climate adaptation challenges."*

Following the completion of Phase 1 of the Land Use Review, which focused on evidence, Phase 2 is now getting underway and is expected to take two years to complete.

Phase 2 will seek to optimise land use across key Government objectives such as improving (1) socioeconomic, (2) climate, (3) biodiversity, (4) water, and (5) air quality outcomes. The tasks include;

1. Clarification of environmental and socioeconomic objectives and data improvement
2. Identification of land-use scenarios to achieve environmental and socioeconomic objectives
3. Setting out potential policy options

The Land Use Review provides an opportunity to identify the existing and future requirements for agricultural land drainage having regard to potential flood risks.

In addition to the national Land Use Review, the proposed EU Nature Restoration Regulation (2022/0195) which is a significant component of the Biodiversity Strategy 2020 aims to restore ecosystems (including wetlands and rivers) in need and preserve the ones that are still in good condition.

Action 3.11: A review of arterial drainage requirements and the underpinning Arterial Drainage Act will be undertaken in order to inform future land use policy decisions arising out of the Land Use Review and to support the preparations for the implementation of the new Nature Restoration Law and the Heavily Modified Water Body review process.

The review will be supported by the OPW and other key stakeholders. Specific tasks will include;

1. Assessing and advising on the implications of different land use policy options, arising out of the Land Use Review, on arterial drainage requirements and the consequential impacts (both positive and negative) on socioeconomic, climate, biodiversity and water status objectives and outcomes.
2. Assessing and advising on the legislative changes to the Arterial Drainage Act necessary to (1) support the national land use policy objectives arising out of the Review and (2) ensure that future arterial drainage practices are sustainable and compliant with the environmental objectives set out in the 2021 Climate Action Plan, the WFD, River Basin Management Plan and the National Biodiversity Action Plan, as well as flood risk management objectives.

The Minister for Housing, Local Government and Heritage is considering designating proposed drained water bodies as HMWBs for Cycle 3 while the review takes place, subject to meeting all other designation criteria. This will provide certainty regarding objectives during the cycle. Designations will then be reviewed again for Cycle 4 once land use policy and drainage policy are clarified.

Next steps:

Following the outcome of the technical review of water bodies impacted by specified uses, including; Water Storage & Regulation (impoundments for water sources and hydropower), Flood Protection, Urban land use, Navigation (inland navigation and ports) and Arterial Drainage, the 466 water bodies satisfying the criteria for HMWB designation, are under consideration by the Minister for designation as HMWBs for the purposes of Cycle 3. This is so that the environmental objectives applying to the related water bodies are clear and unambiguous.

Following the EPA's technical review, DHLGH has engaged with the '*specified use owners*' to collate the information necessary to decide on whether to designate water bodies as HMWBs for Cycle 3, based on the designation test criteria. The information included; (1) the effect of full water body restoration on the specified use and or the wider environment and (2) whether or not there is better environmental option available in the area.

Based on the information received from the '*specified use owners*' and following consideration of the criteria for designation (Steps 7 to 9) water bodies have been assigned into one of the following four categories:

1. Proposed as heavily modified because of the significant adverse effect on a specified water use or the wider environment that full restoration would entail and the fact that there are no obvious better environmental alternatives available in the area.
2. Those water bodies that require further site-specific studies during the third-cycle to assess whether there is a significantly better environmental option that is not technically infeasible or disproportionately expensive before deciding whether to designate or not. These water bodies should be designated for Cycle 3 so that there is certainty regarding objectives. However, they should be reviewed for Cycle 4 based on the further site-specific studies.
3. Water bodies that should not be designated as heavily modified because full restoration will not have a significant adverse effect on a specified water use or the wider environment and/or there are better environmental alternatives available in the area.
4. Other case-by-case considerations, e.g. insufficient information available.

A final public consultation is currently underway before a final decision is made by the Minister. Once decisions are made on the designations these shall apply for the third RBMP cycle. It is expected that the consultations and designation decisions will be concluded by the end of 2024.



4

Measures Required

The previous chapter set out the environmental objectives of this river basin management plan. This chapter describes the actions (known as the programme of measures) that will aim to ensure these objectives are achieved in practice. The programme will include both basic and supplementary measures.

Basic measures

The first (and minimum) element of the programme will be the basic measures to implement existing water protection directives in full, for example, the Urban Wastewater Treatment, Nitrates, Bathing Waters, Habitats and Pesticides.

The 11 key EU Directives which form a key element of the Basic Measures
Bathing Waters Directive
Birds Directive
Habitats Directive
Drinking Waters Directive
Major Accidents and Emergencies Directive
Environmental Impact Assessment Directive
Sewage Sludge Directive
Urban Wastewater Treatment Directive
Plant Protection Products Directive
Nitrates Directive
Industrial Emissions Directive

The existing regulatory controls are not sufficient to deliver improved comprehensive protection for all waters, as envisaged by the Water Framework Directive. Consequently, the basic measures also include additional controls introduced for specified activities. Such actions include updated pollution controls (such as Codes of Good Agricultural Practice), new systems of authorisation (for abstractions, physical modifications or dangerous substances), plus general binding rules related to on-site systems and forestry.

Supplementary measures

The programme of measures can also include supplementary measures that augment basic actions to achieve water objectives. These include codes of practice, voluntary agreements, demand reduction, education, rehabilitation or research programmes and legal, administrative and economic instruments. These actions have been considered (either nationally or locally) on the basis of current monitoring and detailed technical evidence that provide a clearer picture of the scale and nature of water problems.

Progress in implementing measures during Cycle 2 (2018-2021)

In July 2010, the first-cycle River Basin Management Plans (RBMPs) for Ireland were published, covering the period up to 2015. Moving away from multiple River Basin Districts to just one National River Basin District, the second RBMP process was radically different to the first RBMP.

The second-cycle plan should have been finalised by December 2015, covering the period 2016-2021. However, delays in preparation of the second-cycle plan occurred due to the extent of reforms in the water services sector in Ireland at the time. As a result, Ireland was two years behind the timelines stipulated in the WFD for delivering the second-cycle of RBMPs. The second-cycle plan was finally published in April 2018 and covers the period 2018-2021.

Building on the lessons learned from the first planning cycle, the second plan delivered new approaches to governance, river basin management planning and catchment management. It put in place a much-improved evidence base to underpin the decision-making both nationally and locally, along with a stronger and more integrated approach to public consultation and engagement. It set out a strong suite of both national measures, and prioritised supporting local measures, all of which are having a significant effect on the management and protection of water resources.

The Plan's key measures included:

- Investment of €1.7bn by Irish Water (*now Uisce Éireann*) in wastewater projects and improvements to collection systems over the period 2017-2021.
- Water Conservation and leakage reduction: Aiming to achieve sustainable and efficient use of water by addressing (i) the high levels of leakage in water distribution networks and the associated unaccounted-for water and (ii) the very high levels of water use by the top 1% of domestic users (16%).
- New legislation and improved controls for the management of water abstractions: A water abstractions authorisation system to be established.
- Extension of Domestic Wastewater Treatment Systems grant scheme to assist with costs of domestic wastewater treatment system / septic tank remediation in high-status water areas and in Priority Areas for Action where defective systems are posing a risk to waters.

- Deployment of 38 specialist local authority investigative assessment personnel, under the expanded work programme of the Local Authorities Waters Programme (LAWPRO), to carry out scientific assessments of water bodies and drive the implementation of measures at a local level.
- A new collaborative Agricultural Sustainability Support and Advisory Programme (ASSAP) between the State and the dairy industry, consisting of 30 Sustainability Advisers promoting best agricultural and environmental practices in the 190 'areas for action'.
- The development of water and planning guidance for local authorities to help with the consideration of risks to river basin objectives in planning and development decision-making.
- The development of a collaborative approach to protecting drinking water sources between stakeholders to effectively manage and protect drinking water sources at risk from activities in the catchment area.
- Protection of high-status waters: the creation of a 'Blue Dot catchments programme' for the protection of high-status objective water bodies, which will focus attention and resources across agencies.
- A Community Water Development Fund to enable and support community water initiatives. This entails a commitment of €500,000 per annum.

Overall, the second-cycle plan contained some 86 individual measures. Every one of these measures is either completed or is currently in progress (Table 10). However, it must be recognised that water quality and the status of water bodies has not improved at the anticipated rate. While improvements are recorded by the EPA, these have been overshadowed by declines in other areas.

Table 10: Assessment (end of 2021) of the Outcomes from the Second RBMP.

	**255**	Urban wastewater treatment projects progressed	135 of the 255 projects were completed by the end of 2021. A further 81 were at construction or advanced planning stage. Upon completion of feasibility studies, a further 2 were deemed not to be required. The remaining 37 were put on hold to be reviewed as part of the next investment cycle.
	**€73m**	Invested to reduce water leakage by 61 million m^3 per annum. Reduce leakage from 45% to 38%	Totalling 46% in 2018, Irish Water's (now Uisce Éireann) rate of leakage nationally was reduced to 38% nationally by 2021. This reduced leakage rate equates to a saving of 153 million litres of water per day.
	**30**	Sustainability advisors in place to deliver the Agricultural Sustainability Support and Advisory Programme	33 ASSAP Advisors in place by end 2021.
	**43**	Technical personnel deployed to regionally based Local Authority Water support and Advisory Teams	Following staffing review, a need for 38 positions was identified: 30 catchment scientists, 5 catchment managers, 1 Blue Dot scientist, 1 programme lead & 1 admin. Staff currently in place as part of LAWPRO's Catchment Assessment Team.
	**23,000**	18,000 Farmers will receive sustainability advice through the Dairy Sustainability Initiative (DSI) and 5,000 Farmers under the Agricultural Sustainability Support and Advisory Programme (ASSAP)	• 2,500 farm visits by ASSAP advisers, and 550 follow up visits by end 2021[10] • 16,000 engagements with dairy farmers through Teagasc/DSI initiatives. • DSI's SWITCH programme and other advisory services providing 18,000 farmers with information on good practices and sustainable dairying.
	**4,000**	Inspections under the National Inspection Plan for Domestic Wastewater Treatment Systems	>4300 inspections completed.
	**3,000+**	Water abstractions registered and an authorisation system implemented	1,723 registered abstractions by February 2022, including all public abstractions. New Water Environment (Abstractions and Associated Impoundments) Act 2022 now in place to provide for the registration and licensing of water abstractions.
	**1**	Guidance for planning authorities on physical planning and the Water Framework Directive	Public consultation on the draft guidance is expected in 2024.
	**721**	Water bodies to achieve general water quality improvements	Net decline nationally of 179 water bodies (3.7%).

10 https://www.teagasc.ie/media/website/publications/2022/ASSAP-Update.pdf

Table 11: Water quality outcomes between the first and second-cycle plans. Note that ⍰ indicates an increase in water bodies achieving environmental objectives, while ⍰ denotes a deterioration. Slight differences in the sites included in monitoring programme between the two periods mean that not all of the water bodies can be compared.

Water body type	Total number of water bodies	Achieving objectives in 2015	Achieving objectives in 2021		Net change
			Still achieving since 2010-2015	Now achieving since 2010-2015	
Rivers	3,192	1,235	852	215	↓168
Canals	16	12	12	2	↑2
Lakes	812	92	69	20	↓3
Transitional	156	23	7	5	↓11
Coastal	97	25	16	7	↓2
Groundwater	514	470	461	11	↑2
Total	**4,787**	**1,857**	**1,417**	**260**	**↓180**
Water bodies in Cycle 2 Priority Areas for Action	721	14	6	122	↑114

While there was an overall slight improvement in water quality between 2015 and 2021 (i.e. a further 260 water bodies had achieved their environmental objective by the end of the second-cycle), this was offset by 439 water bodies deteriorating, resulting in a net decline of 3.7% (Table 11). However, out of the 721 water bodies within the Prioritised Areas for Action identified for the second-cycle, there was a net improvement of 16% water bodies.

Implementing measures in Cycle 3 (up to 2027)

Measures commenced in Cycles 1 and 2 will continue to be implemented. However, improved technical evidence indicates that all water bodies require further, more targeted actions. Some water bodies require measures to ensure they are protected and do not deteriorate, some require more robust restoration measures to achieve at least good status, while a significant proportion of water bodies require further assessment to determine what the next steps are in terms of implementing measures. A breakdown of the number of water bodies where these different measure types are needed is provided in Table 12 and Figure 20 and summarised as follows:

Where a water body is '*At Risk*', restoration measures addressing the significant pressures outlined above will be required to ensure that the water body achieves its environmental objectives. This type of measure will be required in the 1,649 water bodies identified as '*At Risk*'.

Measures to protect a water body from deteriorating will also be required for the 1,963 water bodies that are currently '*Not at Risk*'.

For the 1,230 water bodies that are currently in '*Review*', these water bodies require further assessment. There are two components to this category in terms of action and measures as follows:

In approximately 21% of water bodies in '*Review*', measures are in place but the water quality improvement has not yet been realised, or there has been some slight indication of improvement but not enough yet to categorise them as '*Not at Risk*'. Therefore, these water bodies require further monitoring and assessment and this action is already accounted for in the EPA monitoring programme.

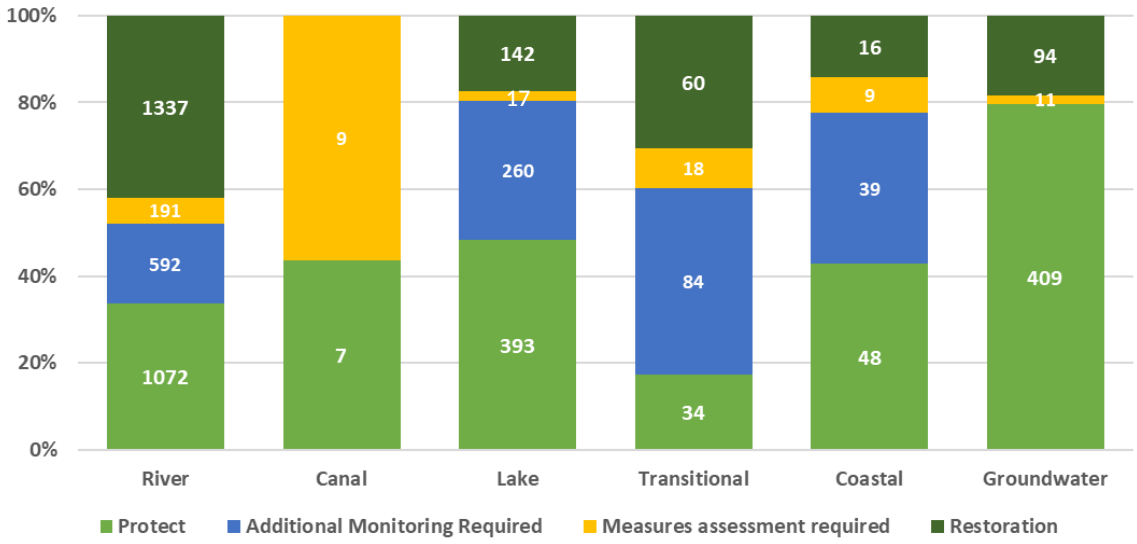
In the remaining 79% of water bodies in '*Review*', there is currently inadequate evidence to determine whether or not the water body is '*At Risk*' and measures should be put in place to ensure this additional evidence can be obtained.

Action 4.1: The EPA and LAWPRO, with the support of the implementing bodies and other stakeholders, will continue to assess the impacts of pressures on waters to inform the measures that are needed. (Timeline: Ongoing).

Table 12: Breakdown of type of measures required for each water body type.

Water body Type	Protect	Type of measures required			Total
		Additional Evidence Required	Measures Assessment Required	Restoration	
River	1,072	592	191	1,337	3,192
Canal	7	0	9	0	16
Lake	393	260	17	142	812
Transitional	34	84	18	60	196
Coastal	48	39	9	16	112
Groundwater	409	0	11	94	514
Total	**1,963**	**975**	**255**	**1,649**	**4,842**

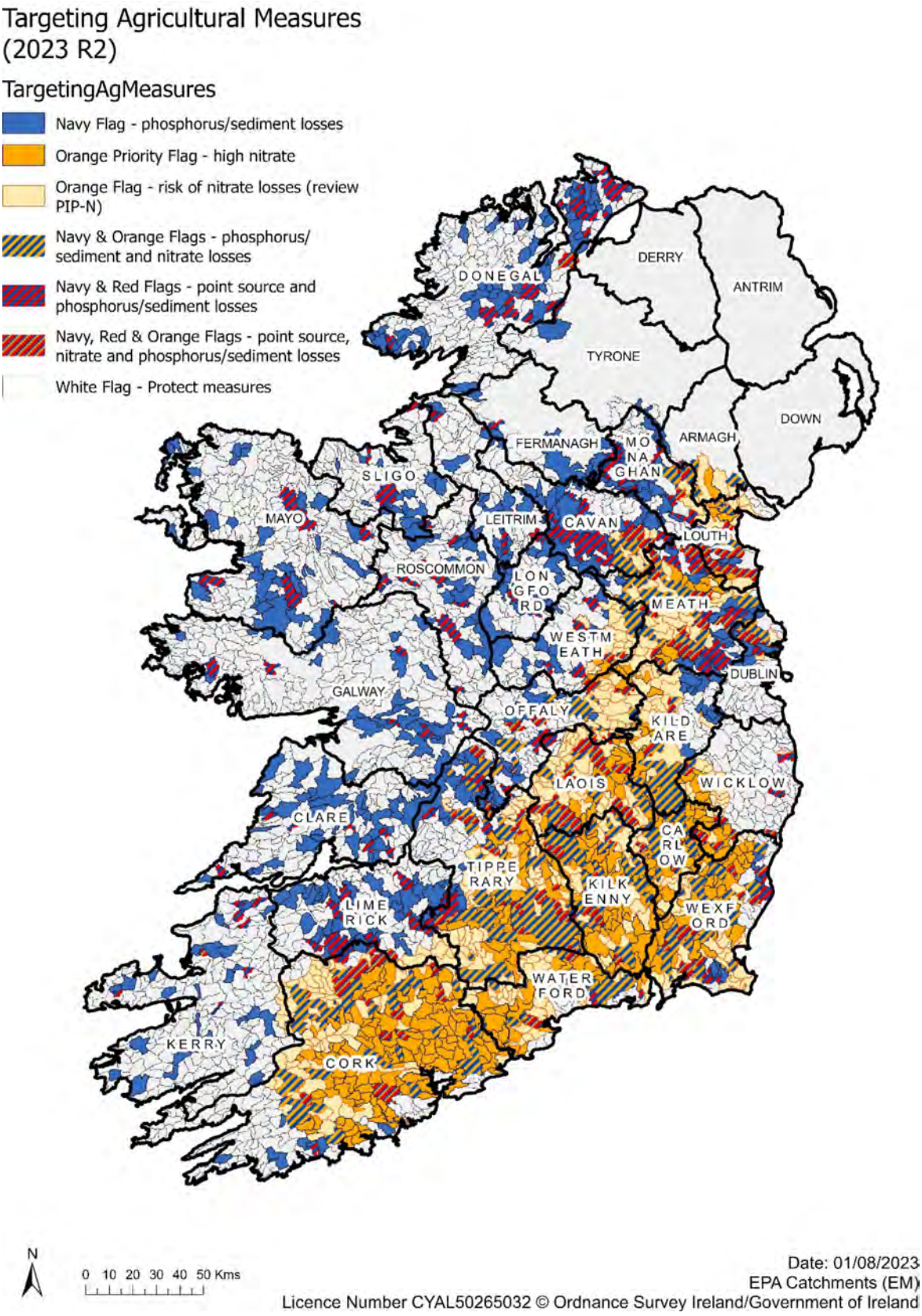
Figure 20: Breakdown of type of measures required for each water body type.

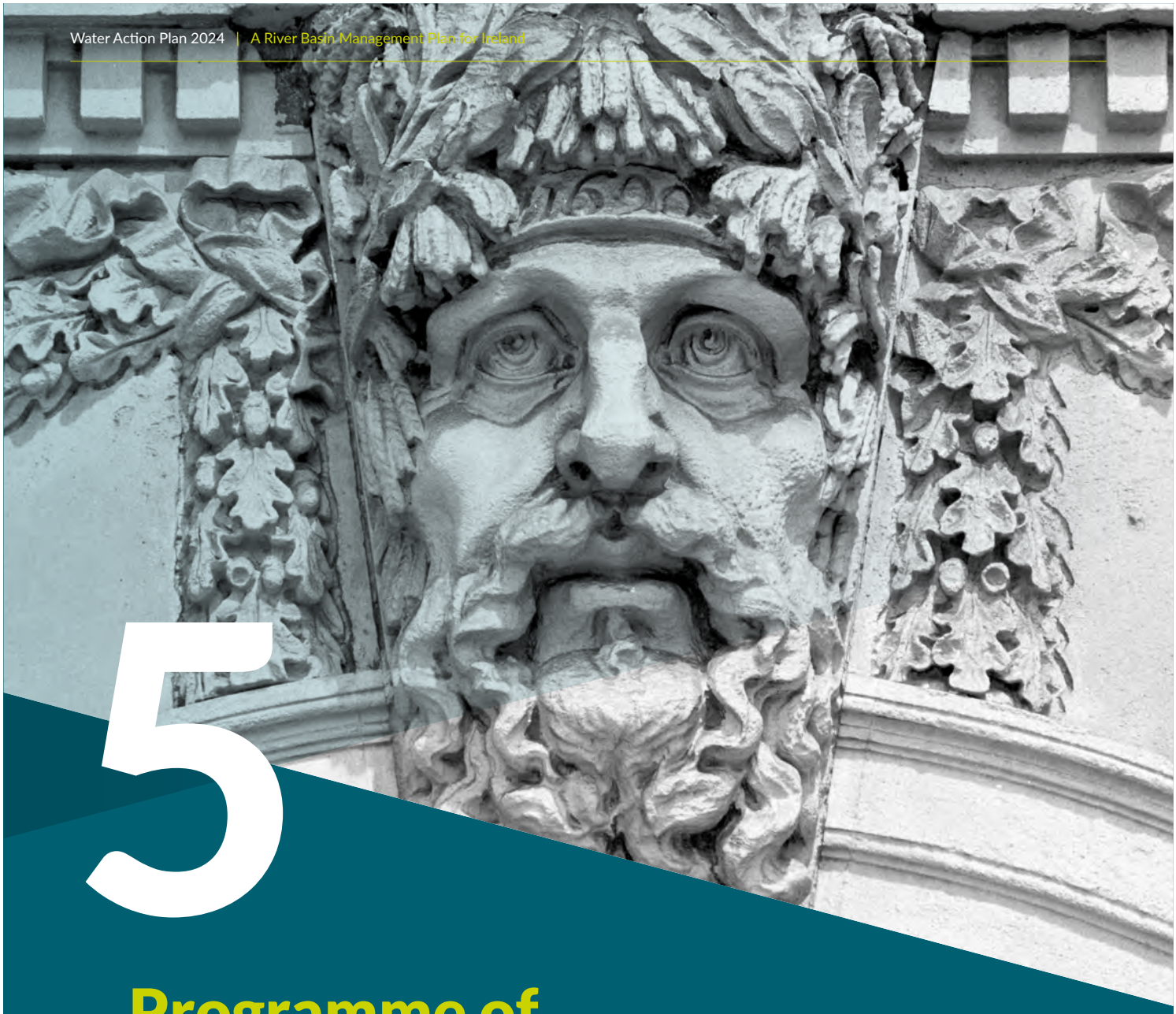


Targeting measures – the right measure in the right place

Recent advances in the development of the evidence base mean that measures can now be much more targeted to the specific water quality issues and risks within catchments. For example, the areas impacted by nitrogen (N), phosphorus (P) and organic pollution from agriculture vary across the country, and so a different approach to measures may be required for specific areas to address the relevant issues (Figure 21).

Figure 21: Map showing where agricultural measures need to be targeted to address different water quality issues. Navy flags are for measures to address impacts from phosphorus and sediment runoff; red flags are for measures to address organic pollution, especially from point sources; and orange flags are for measures to reduce nitrogen leaching.





5

Programme of Measures to 2027

In addition to continuing to implement measures already commenced in Cycles 1 and 2, Ireland needs to take significant additional measures to return all water bodies to 'Good Ecological Status' (or good ecological potential). The scale of the change needed is considerable and so is the effort and time needed to implement measures. Natural systems will also take time to recover and then be measured by the WFD monitoring programme.

Our programme of measures has three strategic aims:

- Reduce the diffuse loss and direct discharge of nitrogen and phosphorus compounds into waterways and groundwater.
- Restoring continuity and the natural functions of rivers.
- Targeting specific pressures (such as building or upgrading wastewater treatment plants).
- Other pressure are diffused across the landscape of each catchment and involve multiple private organisations and individuals. These are much more complex to address. The additional vulnerability of our water catchment to human-induced climate change and the consequential increased mobility of some pollutants further complicates the timescales to achieve the original objectives of the water framework directive.

How We Protect and Restore Water

Management measures are required to protect and restore natural waters. These measures are many and diverse. They include the implementation of eleven existing EU Directives such as the Nitrates Directive and the Urban Wastewater Treatment Directive. The Water Framework Directive also introduced new mandatory measures, including the control of water abstractions, the control of engineered alterations to natural waters (hydromorphological changes) and the protection of vulnerable catchments from which drinking water is sourced.

With regard to the implementation of regulatory regimes arising out of the existing EU Directives, continual efforts to secure full environmental compliance and to increase enforcement, where necessary, is essential. This is one of the key goals of the proposed 2022-2027 programme of measures. In addition, a number of new management regimes are in the process of being introduced to strengthen controls on water abstractions and engineered alterations to natural waters. The transposition of the new 2020 Drinking Water Directive has also provided the opportunity to implement a more comprehensive and robust approach to drinking water source protection.

In addition, to the measures mentioned above a number of 'supplementary measures' have been put in place during the second river basin planning cycle. These were judged to be necessary to drive water quality improvements and protection in a coherent manner following extensive consultations. They included, for instance, new governance and implementation structures (such as LAWPRO and ASSAP), additional water protection measures under CAP, additional investment in public wastewater infrastructure and the remediation of domestic wastewater treatment systems. The supplementary measures also included further technical research and development to improve our knowledge of environmental pressures on water and how to address them effectively.

The characterisation process led by the EPA and supported by a broad range of stakeholders is particularly important for identifying the types and location of risk and impacts on waters. The recent technical advances mean that a more comprehensive, robust and streamlined management regime can now be designed and implemented. We have a clearer view of what mitigation measures are required and where those measures need to be implemented locally to improve the status of natural waters, in other words, 'putting the right measure in the right place'.

The proposed new and enhanced measures contained in this plan reflect the additional measures considered necessary to deliver the objectives of the WFD in full and to contribute co-benefits to other environmental priorities including biodiversity and climate mitigation and adaptation (see Appendix 2 for the full list of measures).

The additional and enhanced measures proposed in this plan take into account;

- The high level of environmental ambition committed to in the Programme for Government.
- Where possible, set quantitative targets for the deployment of measures.
- The updated characterisation / risk assessment outcomes.
- Lessons from the implementation of measures to date.
- Feedback from a wide range of stakeholders, including 170 submissions during the consultations on Significant Water Management Issues as well as over 1,850 submissions received by DHLGH and through LAWPRO, in response to the draft River Basin Management Plan.
- The scientific evidence for the purpose of targeting 'the right measure in the right place'.
- The goal of delivering integrated, multiple co-benefits for water, biodiversity and climate, wherever possible.[11]

11 The integrated approach reflected throughout this draft river basin management plan aligns with the Framework for Integrated Land and Landscape Management (FILLM) proposed by An Fóram Uisce. FILLM builds on and is a reframing of the Integrated Catchment Management (ICM) approach used in water resources management. However, it broadens it to include the other components of our natural environment, while retaining catchments as the appropriate landscape units. The development of the 46 Catchment Management Work Plans will reflect this approach.

- The evolving governance and implementation structural needs for the next cycle.
- The need to increase environmental enforcement and compliance.
- Opportunities to strengthen links between the WFD and other regulatory processes.
- The need to replace outdated and deficient regulatory regimes with more comprehensive, robust and streamlined management regimes.

In addition to the Strategic Environmental Assessment (SEA) and Appropriate Assessment (AA) processes that have been applied to this high level plan, all measures and projects arising during the third-cycle RBMP will be subject to further environmental assessments at the appropriate level, as required. A full list of mitigation measures taken from the SEA and Natura Impact Statement (NIS) that apply to the Programme of Measures can be found in the accompanying appendices to the plan. In completing any required assessment, the responsible agency and/or project partners should ensure the utilisation of the appropriate tools available, such as the EPA's Environmental Sensitivity Mapping Tool (https://enviromap.ie/).

Any proposed measures must demonstrate that they can be implemented without adverse effects on the integrity of Special Areas of Conservation (SACs) or Special Protection Areas (SPAs). Where adverse effects from proposals remain following mitigation, in line with Habitats Directive Article 6(3), consent for the proposals cannot be granted unless the prerequisites set by Article 6(4) are met. This will require that alternatives have been considered.

Action 5.1: The Department of Housing, Local Government and Heritage will oversee an independent review of progress with the implementation of the Programme of Measures.

The review will be carried out with the assistance of the WFD Implementation Structures. Reviews will be undertaken on an annual basis. Progress will be tracked, lessons learned and measures adapted with the aim of accelerating the rate of progress, as quickly as possible. Progress results will be published.

Based on annual reviews and as more data becomes available, there will be a mid-term progress review by 2025 for the identification of additional, evidence based measures where gaps exist. There will be a plan for their implementation as soon as possible within the period of the plan or beyond, where justified under Article 4 of the WFD.

Protection of Water Bodies from deterioration

Restoring water quality to 'good' or 'high status' and ensuring that water quality does not deteriorate, are both equal requirements of the Water Framework Directive.

Recent EPA water quality reports show some successes in restoring the quality of water bodies, but these improvements have been overshadowed by an overall net decline in the status of our water bodies. This highlights the need for a greater focus on the protection of water quality.

The reasons for these deteriorations are not always clear. They can include pollution incidents, land development and changes in land use or in the activities that take place on land. Protection of water quality will, therefore, require all stakeholders whose activities may impact on waters working together to achieve this goal.

There are three key elements to ensuring no deterioration:

1. Ensure that statutory, regulatory measures are implemented in all areas, prioritised based on risk to water quality. A strong enforcement regime must be in place to support this. Enforcement also needs to be underpinned by strong advisory and educational supports to ensure that practices and behaviours are modified to maximise compliance with environmental laws.
2. Ensure that new development and changes in existing land use or in the activities that take place on land are appropriately assessed and appropriate mitigation measures are put in place, so that they do not adversely impact on water quality.

   Rigorous assessment of statutory measures is required to ensure that they are adequate to protect water quality. Where they are not, consideration should be given to making certain voluntary measures mandatory.
3. A key protect measure is the contribution of the local authority's planning and development system. This ensures transparency for the public where development with the potential to impact on water quality and the wider environment, is publicly advertised and offers opportunities for the public to contribute to the assessment process. Robust environmental assessment of the potential impacts of proposed development on water quality is critical. The introduction of new guidelines on water and planning will greatly assist in this process.

The third-cycle Plan aims to improve how regulation (including enforcement) and collaboration work most effectively together to deliver significant environmental improvements. As the key body for the enforcement of water protection legislation, such as the *Good Agriculture Practice for the Protection of Water Quality Regulations* and the *Water Pollutions Acts*, local authorities need the appropriate resources and support to perform this function effectively.

In preparation for the third-cycle plan, and any additional functions assigned to them, local authorities through the County and City Management Association (CCMA) are working together with DHLGH to further consider the role of local authorities in this area and the resources required to support them. This work will examine the full breadth of local authority/LAWPRO integrated catchment management functions at Tier 3 of the governance structure, including the restore and protect functions of local authorities and their regulatory and collaborative roles.

The National Technical Implementation Group, chaired by the EPA, will examine issues which are preventing water quality objectives from being achieved and will identify any evidence, legislative, policy or implementation gaps which need to be addressed with the aim of enhancing the protection of water quality and preventing declines. The focus will be on protecting water bodies from pressures and activities which are resulting in deterioration of water quality.

Action 5.2: The National Technical Implementation Group will identify the issues preventing water quality objectives from being achieved and will identify any further evidence, legislative, policy or implementation gaps that need to be addressed (Timeline 2024).

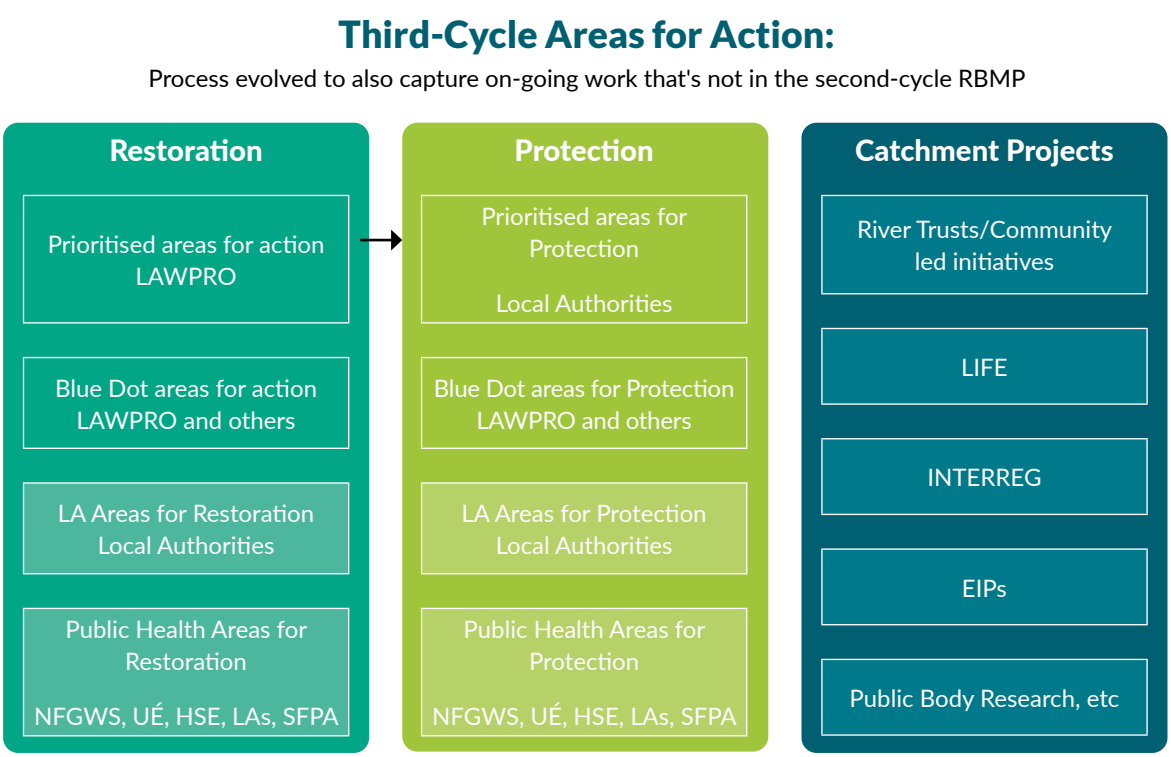
Water body areas for Targeted Action (Areas for Action)

This section outlines the Areas for Action that have been selected for inclusion in the third-cycle River Basin Management Plan (RBMP). The approach to selection expands on that taken for the second-cycle where Priority Areas for Action were managed by the Local Authority Waters Programme (LAWPRO). The third-cycle approach is designed to provide 'a place in the plan for everyone' by including a wider selection of Areas for Action incorporating Areas for Protection, Areas for Restoration and Areas for Catchment Projects. Further details of this framework are outlined in Figure 22.

Areas for Restoration

Areas for Restoration are undertaken to target '*At Risk*', and sometimes '*Review*' water bodies. In the second-cycle RBMP, focus was on supplementary measures within Priority Areas for Action (PAAs). LAWPRO was assigned a further characterisation function and in areas where agriculture was a significant pressure, the Agricultural Sustainability,

Figure 22: Third-Cycle Areas for Action Framework



Support and Advisory Programme (ASSAP) was responsible for working with landowners to implement supplementary mitigation measures.

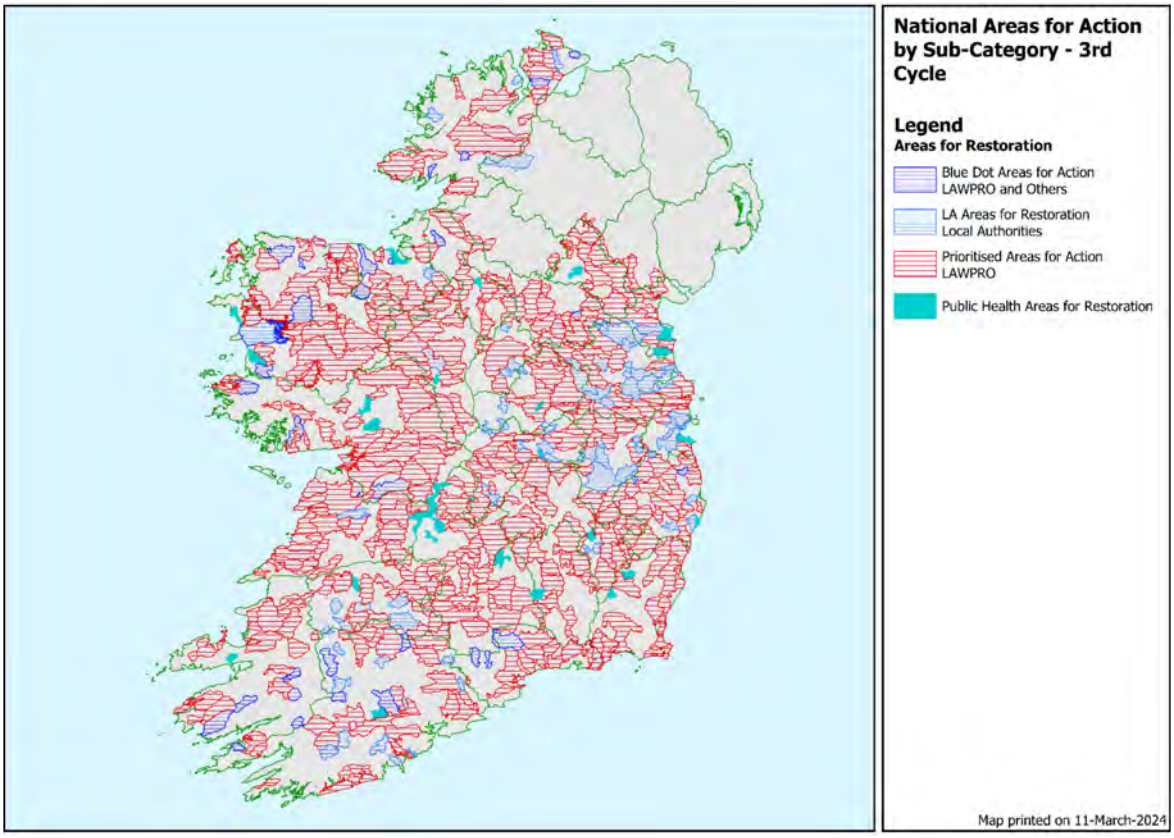
A key tool in the third-cycle is the ongoing work of the Local Authority Waters Programme (LAWPRO), which will prioritise its third-cycle catchment work in 343 of the areas for action. LAWPRO's catchment assessment process is carried out in two phases. In the first phase, catchment scientists study all the available information on the catchment from various sources such as local authorities, EPA etc. LAWPRO also meets with the public and local farmers to advise them of the work to be carried out and to seek their local knowledge of the catchment. In the second phase, LAWPRO samples and examines the water bodies in detail on the ground. Catchment scientists analyse the results of that work to determine what the water problems are, and they recommend where measures should be targeted. LAWPRO then works with the relevant bodies to drive and encourage implementation of those measures, both basic and supplementary.

The learnings from LAWPRO's work in the PAAs informs work in other Areas for Action and highlights best catchment management practice to be applied in all water bodies across the country.

Local authorities are also undertaking restore activities, through application of basic measures, as part of their work programmes. All local authorities have statutory obligations with respect to water. The Local Authority Performance Framework is implemented by the EPA to coordinate and focus the environmental enforcement activity of the 31 local authorities to better align with achieving environmental outcomes under set national enforcement priorities. Some Local Authorities will also be leading on defined Areas for Restoration in the third-cycle. These activities include, for example, Section 4 licence inspections under the *Local Government (Water Pollution) Acts*; agricultural inspections under the *EU (Good Agricultural Practice for Protection of Waters) Regulations*, and domestic wastewater treatment system inspections under the *Water Services Act*.

Multiple organisations undertake restore activities to improve, for example, drinking waters and bathing waters, and again these activities are captured in the RBMP. The new Water EIP project led by LAWPRO will provide the opportunity to resource mitigation actions on approximately 15,000 farms.

Figure 23: Map of Areas for Restoration



Areas for Protection

The Areas for Protection category covers activities being undertaken in line with legislative requirements referred to as basic measures and captured under Recommended Minimum Criteria for Environmental Inspection (RMCEI) planning. It also includes the source catchments of several Group Water Schemes, with these areas being led by the National Federation of Group Water Schemes. The addition of this category in the third-cycle affords the opportunity to account for a proportion of this existing current resource, to target the effort into Areas for Protection.

Catchment Projects

Catchment Projects refer to areas where there are existing projects ongoing at a catchment scale, led by various bodies, that will continue into the third-cycle, or where funding has been committed and plans are in place for projects, research or community-led initiatives (e.g., Rivers Trusts), to begin during the third-cycle. LAWPRO and/or the relevant local authorities will act as a support for many of these projects to guide the project teams on the Area for Action process. The number of catchment projects is expected to grow during the lifetime of the plan, and new projects will be captured in implemention tracking e.g Wild Atlantic Nature and Waters of LIFE Integrated Projects.

Figure 24: Map of Areas for Protection

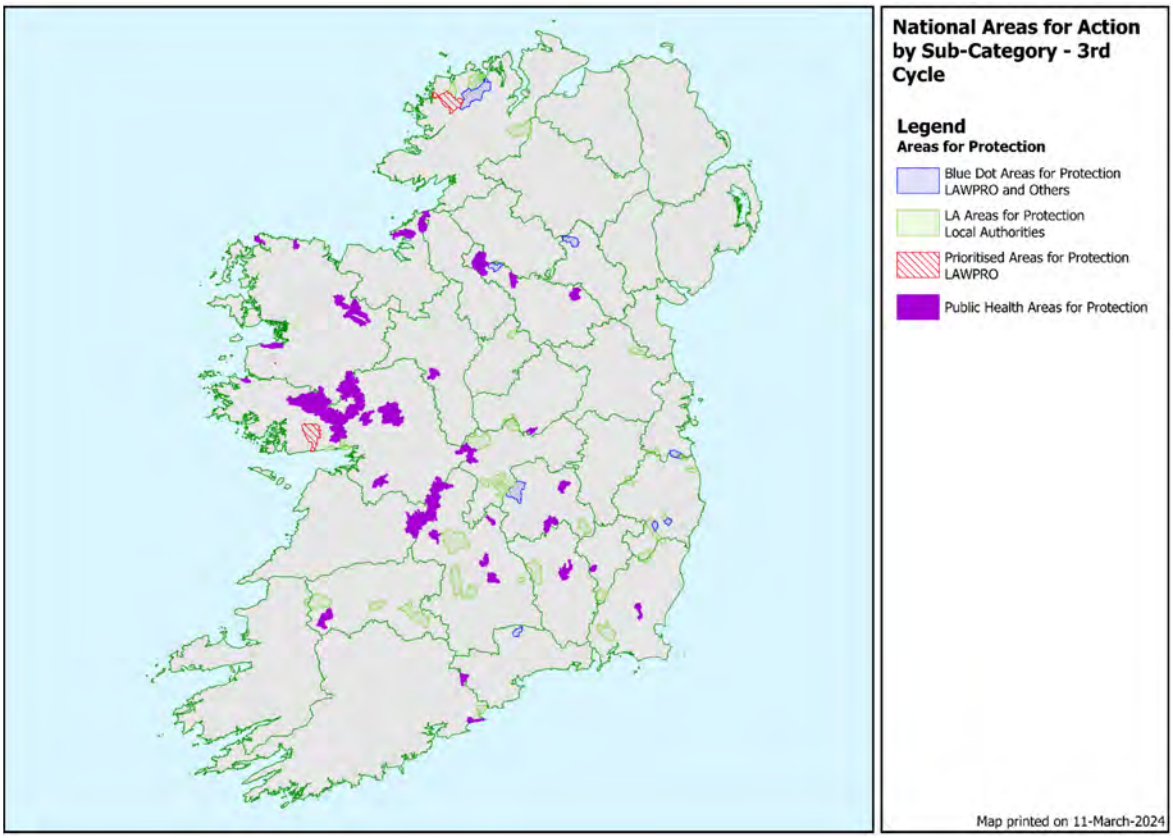
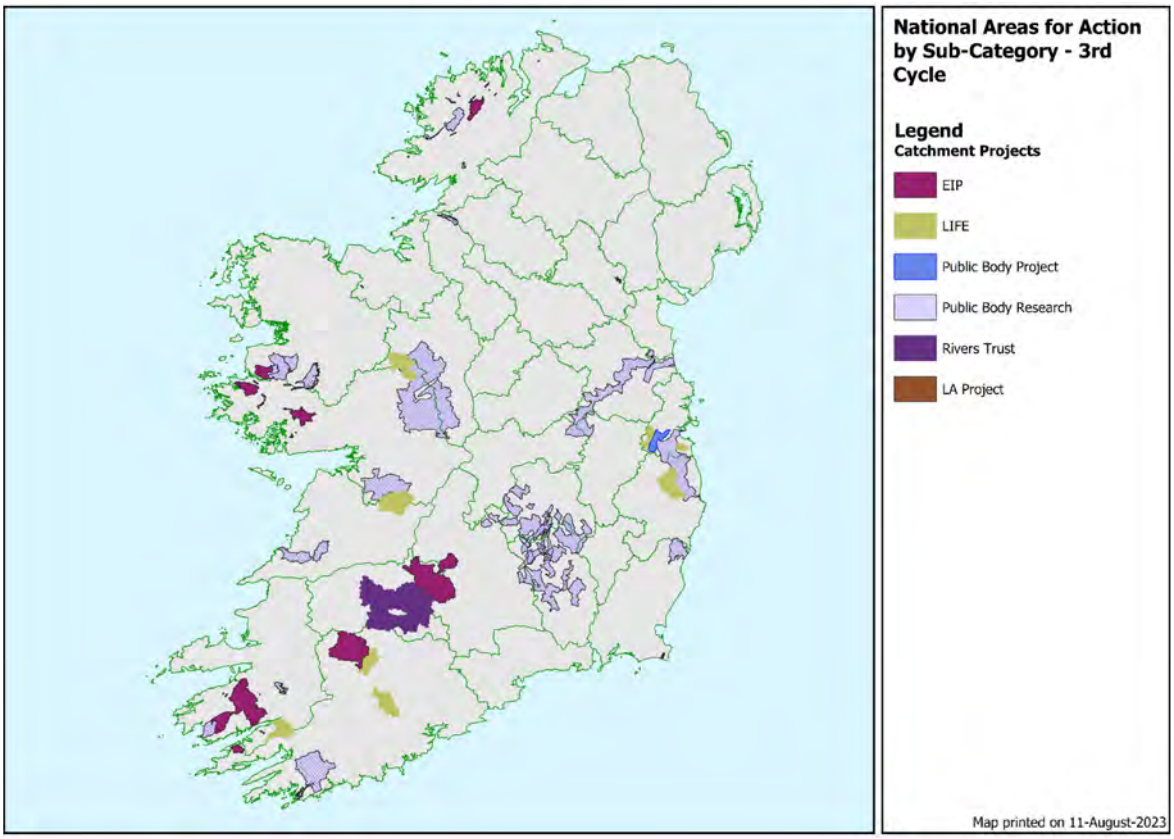


Figure 25: Map of Catchment Projects



High Status objective water bodies (Blue Dot Areas for Action and the Waters of LIFE project)

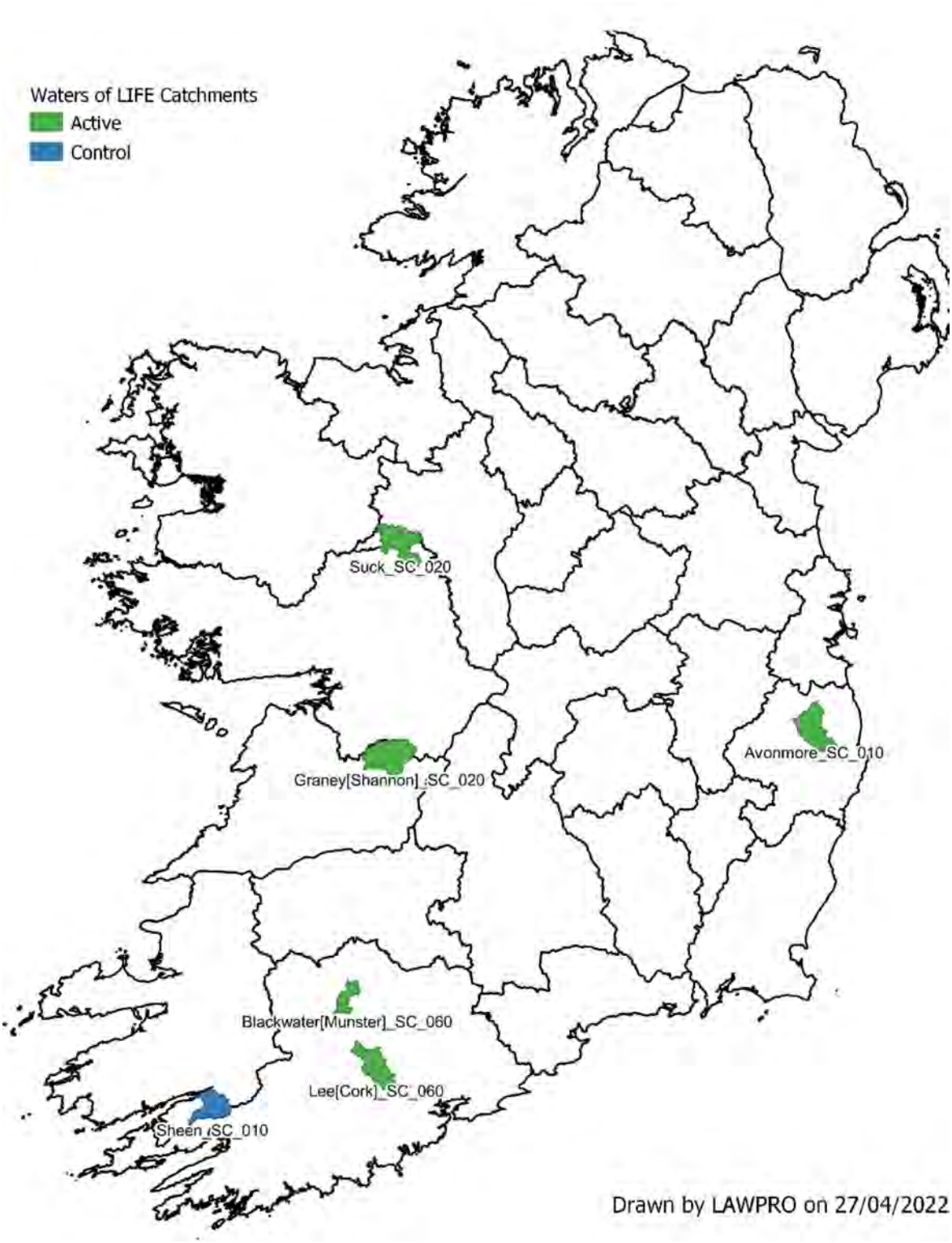
Blue Dot water bodies are those which have been assigned a high status objective because they are achieving high status, or did achieve high status in the recent past, and Ireland's ambition is to preserve and protect them or to restore them where necessary. There are 402 Blue Dot water bodies nationally and 244 of them are within Areas for Action or Catchment Project areas in the third-cycle. The Blue Dot Catchments Programme, which is a collaborative programme between local authorities and implementing bodies, will continue its work towards ensuring that all Blue Dot waters continue to meet their high-status objective or improve to high status in the third-cycle.

In support of the Blue Dots Catchment Programme an application was made for funding under the EU LIFE programme. In 2020, the EU Commission awarded LIFE co-funding for the 'Waters of LIFE' integrated project. This project, with an overall investment of €20 million focuses on reversing the long-term trend of decline in the number of high-status river waters bodies.

The Waters of LIFE project is a collaboration between the following partners:

- Department of Housing, Local Government and Heritage, which is the lead partner
- Department of Agriculture, Food and the Marine
- Teagasc
- The Local Authority Waters Programme
- Environmental Protection Agency
- The Forest Service
- Coillte
- Several local development companies

Figure 26: Waters of LIFE Demonstration and Control Catchments



The project, which will run until early 2028, aims to build technical understanding and capacity in relation to the drivers of status change in high status objective rivers and the design and implementation of measures for their protection and restoration. There will also be a strong emphasis on promoting community and landowner ownership of the actions and on building capacity. The project will operate in five demonstration catchments with a sixth catchment acting as a control (Figure 26). These demonstration catchments represent a variety of hydrogeological and hydrological settings and encompass the range of pressures acting on high status objective rivers, including drainage, agriculture, forestry and extractive industries.

A key element of the project will be the development of a pilot results based payments scheme (RBPS) for landowners in the demonstration catchments, which will focus primarily on water quality. The RBPS will be developed through a co-creation process with relevant stakeholders and will build on the knowledge and experience gained through previous schemes such as that implemented by the Pearl Mussel Project and others.

Learnings from the project will be used on an ongoing basis to tackle relevant sectoral pressures where they are impacting on high status objective water bodies. An important objective of the project is to inform the development of future agri-environment and forestry policies and provide for the long-term sustainable management of high-status objective areas.

Implementing Areas for Action during the third-cycle

The Areas for Action captures the full extent of the work being undertaken in catchments that contributes to achieving water quality outcomes, by a range of other stakeholders, not just LAWPRO. The areas for inclusion were agreed by each of the five Regional Operational Committees and five Regional Management Committees.

In total, 517 areas have been selected for focused attention in the third-cycle based on risk. A map of the third-cycle Areas for Action is displayed in Figure 27, with a full list of areas outlined in Appendix 4.

428 of these areas require restoration as they are not currently meeting their environmental objectives.

89 areas are meeting their environmental objectives but require dedicated protection measures to ensure their water quality does not deteriorate from identified risks.

In addition, 17 areas are the subject of other catchment projects/initiatives by stakeholders (e.g. community groups, EIP projects, LIFE projects, etc.), which aim to improve water quality.

Each area for action has a designated lead such as LAWPRO, a local authority, the National Federation of Group Water Schemes, Inland Fisheries Ireland, etc. With this approach we aim to capture all the water quality improvement work that is happening across the country. This will also align actions being carried out for other purposes with the objectives of the RBMP, where possible, so that synergies can be identified, and multiple benefits can be achieved.

The areas were selected through a collaborative workshop process at each Regional Operational Committee. LAWPRO and the EPA led out on the process, in which all public bodies with water quality responsibilities participated. As part of the process, priority was given to areas that linked with those outlined in the second-cycle plan, areas with a high-status objective and protected areas, such as bathing waters, shellfish waters and drinking water supply sources. The following additional principles were also considered:

- selecting areas for action at a sub-catchment scale where practical,
- addressing water bodies in the headwaters first,
- addressing multiple pressures on water quality together,
- building on existing programmes including second-cycle Priority Areas for Action and community group initiatives,
- building on existing momentum delivering improvements in water quality,
- aiming to ensure a fair distribution of tasks between pressure owners, pressure types, bio-geophysical settings and regionally, and
- ensuring the areas included a mix of known, fixable issues and longer-term challenges.

All other water bodies will benefit from the implementation of existing regulatory basic measures (e.g. implementation of the EIA Directive, Nitrates Directive and the Urban Wastewater Treatment Directive), as part of each organisation's annual work programmes.

This implementation process will facilitate a collaborative approach across agencies, where activities are being undertaken in line with the integrated catchment management approach and it will present opportunities for agencies to learn from one another. This will allow for the development of an evidence base on approaches and actions that are successful in restoring and protecting water quality.

The learnings from LAWPRO's work in the PAAs informs work in other Areas for Action and highlight

best catchment management practice to be applied in all water bodies across the country.

As part of the public consultation process on the draft River Basin Management Plan, the public was asked their views on the PAAs selected for focused action. This resulted in additional water bodies being included, and these are identified in Appendix 4. With an increased number of areas for action, completion of the local catchment assessment work programme will rely on adequate resourcing and it is recognised that some of the work programme is likely to roll over into the following cycle.

The National Federation of Group Water Schemes has made some minor amendments to its list of Areas for Action. The identified sustainable long term option for a small number of Group Water Schemes involves either amalgamation with neighbouring Group Water Schemes or being taken-in-charge by Uisce Éireann.

The Blue Dot Catchments Programme will continue its work towards ensuring that all Blue Dot waters continue to meet their high-status objective or improve to high status in the third-cycle. The Programme will draft a detailed work plan in relation to these water bodies, with a view to them forming part of the 46 Catchment Management Work Plans. The monitoring and evaluation of progress will still be carried out by the Blue Dot Steering Group. The Programme will be supported by the Waters of LIFE Project. The Department of Agriculture, Food and the Marine (DAFM) has facilitated priority access to the new Agri-Climate Rural Environment Scheme (ACRES) under the CAP Strategic Plan for many farmers located within catchments with a high status objective. A high proportion of high status objective water bodies (70%) were included in these the ACRES Cooperation Project Areas where an enhance agri-environment and climate measure will apply.

The National Blue Dot Steering Committee will continue its programme of work to highlight the importance of Ireland's high-status waters and to work with the various implementing bodies, landowners, and the public to ensure that high status waters are protected and restored where necessary. LAWPRO's work in the catchments will help to identify work practices that advance this objective and can be applied across the country.

Response to consultation on Areas for Action

As part of the public consultation process on the draft River Basin Management Plan, the public was asked their views on the areas for action selected for focused action. This resulted in an additional 72 water bodies being included. With an increased number of areas for action, completion of the local catchment assessment work programme will rely on adequate resourcing, and it is recognised that some of the work programme is likely to roll over into the following cycle.

You can view the full list of water bodies in Areas for Action on the www.lawaters.ie website.

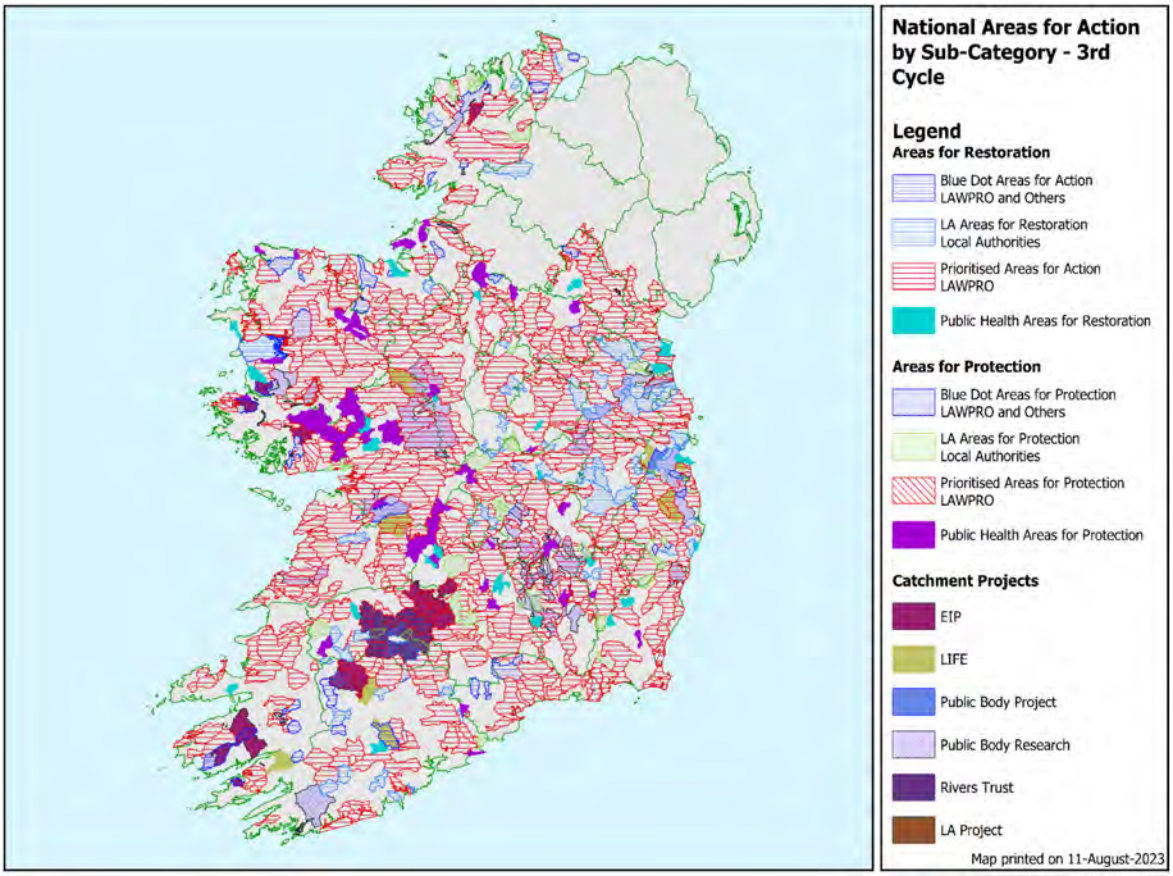
Action 5.3: LAWPRO will confirm significant pressures and work with implementing bodies and stakeholders to promote the implementation of appropriate restoration measures in each Area for Action (restoration) where environmental objectives are not being met. (Timescale: Ongoing).

Action 5.4: LAWPRO will confirm significant pressures and work with implementing bodies and stakeholders to progress the implementation of appropriate protection measures in areas that are meeting their environmental objectives but require protection to ensure that water quality does not deteriorate. (Timescale: Ongoing).

Action 5.5: LAWPRO, in cooperation with the EU LIFE IP Waters of LIFE project team, will publish a new Blue Dot Programme work plan for waters with a High Status Objective (Timescale: 2024).

Action 5.6: Catchment projects aimed at improving water quality to be advanced in 15 areas (including community initiatives, River Trusts, EIPs, PEACE+).

Figure 27: Map of third-cycle Areas for Action



Environmental Measures

The following sections provide a summary of the main environmental measures that address the significant environmental pressures on water. These include both basic and supplementary measures. These measures include those applied at a general scale and specific measures applied to certain catchments or sub-catchments (or at water body scale) as is necessary to meet the specific environmental objectives.

The measures are set out below primarily by the sector driving the impact. This is where the measures will be taken. For example, individual water bodies may have nutrient impacts from various sources (wastewater, farming and urban run-off). The target reductions are set by sector and the individual actors from within the sectors will drive the measures required. More detailed information on measures are provided in the supporting Programme of Measures document contained in Appendix 1.

Summary of the main measures within the Programme of Measures

The following table provides a guide to where to find further detailed information on measures aimed at addressing the most significant pressures/issues affecting waters. The actions under each pressure/issue have been extracted and provided below.

Table 13: Index to further information on the Programme of Measures (Separate document)

Significant pressures/ issues that require additional new measures	Category of Measure	Relevant Section in the Programme of Measures document
Agriculture	Address pressures from rural diffuse & point sources.	1
Physical modifications to the flow, form or function of natural surface water bodies (Pressures on Hydromorphology)	Improve physical condition of the water environment and prevent deterioration through regulation and enforcement.	2
Forestry	Address pressures from forestry.	3
Urban Wastewater	Address pressures from urban wastewater.	4
Urban Runoff	Address pressures from urban runoff.	5
Domestic Wastewater Discharges (Septic Tanks)	Address pressures from rural diffuse & point sources.	6
Unknown Pressures	Some water bodies require further monitoring, investigation and characterisation as the causes of impacts are still uncertain.	7
Other Pressures	Some pressures/activities impact a relatively small number of water bodies and have been grouped together. They include; historically polluted sites, and waste. Aquaculture and Invasive Alien Species have been addressed separately because of feedback from public consultations.	8
Peatlands	Address pressures from harvesting of peat.	9
Industry, Mines and Quarries	Pressures include Integrated Pollution Control (IPC) and Industrial Emissions (IE) facilities licensed by the EPA and industries with Section 4 Discharge to Water licences issued by local authorities.	10
Drinking Water Source Protection	Address pressures from rural diffuse & point sources impacting on the quality of drinking water sources.	11
Invasive Alien Species	Protect water bodies from invasive species.	12
Hazardous Chemicals in the Aquatic Environment	Address sources of hazardous chemicals to eliminate their presence in waters.	13
Aquaculture	Address impacts on water bodies such as; water quality, biodiversity, the condition of the local habitats, risks from the use of pesticides and threats from the introduction of non-native species.	14
Land Use Planning	Address potential impacts from future development by ensuring that that risk is avoided in the first instance and through the inclusion of appropriate conditions in planning permissions for new development.	15

Actions under each of the most significant pressures/issues

1. Agriculture

Actions contributing to a stronger and more targeted Nitrates Action Programme

Agri 1: DHLGH and DAFM will oversee the implementation of the *stronger and more targeted Nitrates Action Programme.* The Fifth Nitrates Action Programme (2022-2025) retains and strengthens the existing controls from agricultural nutrient impacts on water and will implement tighter controls on nitrogen and phosphorus inputs by:

1. Stipulating tighter controls on the timing and methods of application of chemical nitrogen fertilisers and slurry. [Timeframe – In place]
2. Reducing the annual maximum fertilisation rate of nitrogen on grassland by 10% in 2022 with potential for a further reduction of, at least, 5% in 2024 following the Interim Review in 2023 [Timeframe 2024]
3. Reduction in the maximum derogation stocking rate on farms in water bodies where there is, or a risk of, declining water quality [Timeframe 2024]
4. Implementing a livestock excretion banding system from Q1 2023 to more accurately reflect the different rates of organic nitrogen loading from different sized animals in the maximum stocking rate calculations [Timeframe 2023]
5. Establishing a national fertiliser sales database for farmers [Timeframe 2023]

Agri 2: Local Authorities will *strengthen the inspection and enforcement relating to agricultural diffuse pollution.* A total of 57 new Inspectors in local authorities have been allocated for the National Agricultural Inspection Programme (NAIP) and five new staff have been allocated to the EPA to oversee the programme. An additional four staff have been allocated to LAWPRO to help in co-ordinating the activity and avoiding duplication where possible. Inspections will be targeted and risk-based using all the available evidence, including water quality data, the EPA's PIP Maps and the Targeting Agricultural Measures Map on up to 4,500 farms per annum during the lifetime of the Nitrate Action Programme. DAFM will undertake 500-1,000 inspections per year under the GAP Regulations focused in Q1 where risk of nutrient impact on water quality is high. DAFM has increased their derogation inspections from 5% to 10% of all derogation farms per year and will undertake approximately 700 inspections per annum. [Timeframe 2022 - 2024]

Measures in Ireland's CAP Strategic Plan contributing towards water quality

Agri 3: DAFM will implement Ireland's CAP Strategic Plan with a strong emphasis on the achievement of a higher level of environmental ambition. This includes implementing the new Green Architecture of (1) Conditionality, (2) Pillar I Eco-Schemes and (3) the Pillar II Interventions such as ACRES and the new Water EIP. [Timeframe 2023 - 2027]

Agri 4: Eco-scheme measures will contribute to the protection of water quality. DAFM will promote and target the uptake of these measures in locations at farm level where they will maximise water protection. This will be achieved through training and farm advisory services and by using the Pollution Impact Potential (PIP) maps generated by the EPA.

Agri 5: The Water EIP project led by LAWPRO, in partnership with Teagasc and Dairy Industries Ireland will focus on reducing losses of phosphorus, nitrogen, sediment and, where relevant, pesticides to water from agricultural lands by promoting the adoption of innovative best practice in nutrient management, the application of nature-based solutions and other suitable measures. The project will aim to support up to 15,000 farmers in implementing on-farm water protection and mitigation measures.

Additional Measures

Agri 6: DHLGH and DAFM will put arrangements in place to ensure independent assessments and reviews of the efficacy of the Nitrates Action Programme (NAP), the CAP Strategic Plan and the Water EIP (and other relevant measures) to bring the 1,000 water bodies impacted by agriculture up to good status and to prevent deterioration. They will identify additional measures, where necessary, which will be implemented during the lifetime of the plan or beyond, where justified under Article 4 of the WFD.

Mechanisms for review will include; DHLGH monitoring & assessment of progress with the programme of measures, EPA's statutory role in assessing the NAP, EPA research projects and the CAP Strategic Plan Performance Monitoring and Evaluation Framework (PMEF)

[Timeframe - Ongoing, Q4 2025 for mid-term review]

Agri 7: In support of the Catchment Management Work Plans, the Department of Agriculture, Food and the Marine will publish an Agricultural Sectoral Action Work Plan to reduce nitrogen losses to waters in areas where levels are increasing or are too high, and to bring nitrogen, phosphorous and sediment losses to water from agricultural sources within sustainable levels by 2027.

The Sectoral Action Work Plan for Agriculture will include targeted measures to address the 1,000 water bodies at risk from agriculture during the third-cycle, along with protection measures needed to prevent further deterioration. The aim of the plan will be a rapid graduated reduction of nitrogen, phosphorous and sediment losses to water bodies with a target to reach sustainable use and discharges in all catchments of concern by 2027. [Timeframe 2024]

Agri 8: *Online Farm Sustainability Planning*: Teagasc will develop an online Farm Sustainability Plan for farmers complementing existing Nutrient Management Planning online tool to support the wider Agricultural Knowledge and Information Systems (AKIS) programme. [Timeframe 2024]

Agri 9: *Extend and expand the local authorities' water protection office.* LAWPRO will be extended for the full duration of Cycle 3 up to 2027. The CCMA will identify the appropriate level of resources and involvement of LAWPRO to meet WFD objectives up to 2027 and beyond in future RBMPs.

Agri 10: *Provide free on-farm advice to farmers* The sustainability advisory service (ASSAP) will be extended for the full duration of Cycle 3. The dairy industry has increased the number of advisors involved in ASSAP by six for the period 2022 to 2027.

Agri 11: To support the goal of targeting the right measure in the right place all farm advisers involved in the 'Farming for Water' Agri-EIP, will be provided with ongoing professional development, including an appropriate level of catchment science training to ensure that measures are sufficiently targeted.

In addition, these farm advisers will be made aware of the various other relevant funding schemes available to farmers to support the right measure in the right place.

Agri 12: Upskill farmers and advisors to ensure they have the knowledge and tools to implement appropriate measures to reduce the impact on water quality from farming practices.

2. Physical modifications to the flow, form or function of natural surface water bodies (Pressures on Hydromorphology)

Hymo 1: A Hydromorphology Expert Group will be established to support the new National Hydromorphology Programme. This Expert Group will identify interim measures which will be readily implemented during the third RBMP cycle to assist in removing pressures on hydromorphology.

Hymo 2: DHLGH will lead the development of a new enhanced and consolidated legislative regime to address pressures on the physical condition of waters. [Timeframe 2026].

Hymo 3: IFI will establish a restoration programme to mitigate the negative impact of past construction in or near water bodies.

Hymo 4: A Sectoral Action Work Plan for Hydromorphology will be developed, which will include measures and plans to address the 448 water bodies at risk from pressures on hydromorphology, including barriers, channelization, drainage, sediment and flood protection. It will be led and coordinated by DHLGH with supporting bodies IFI, DAFM, Forestry, OPW and DECC. [Timeframe Q4 2024]

Hymo 5: It is proposed that the IFI will lead a multi-agency whole of catchment pilot project on the River Dodder from source to sea with the aim of examining the feasibility of opening up this heavily urbanised catchment to migratory fish species by mitigating the five most significant barriers in the lower reaches and progressing to the next stage, as appropriate. [Timeframe 2024 to 2027].

Hymo 6: IFI will lead a pilot project to be undertaken for the Annacotty Weir in County Limerick. The project will provide an opportunity to test a collaborative and ecology focussed design approach. It will also test enhanced community engagement opportunities that go beyond the standard consultation practices involved in the planning process, thereby assisting with the design and implementation of the national restoration programme. The pilot project is initially examining the feasibility of mitigation and will progress to the next stages, as appropriate.

Hymo 7: Implementation of the roadmap of actions, including the use of state-of-the-art technical solutions, to improve fish migration in the lower Shannon at the Hydroelectric scheme located around Parteen and Ardnacrusha. The pilot project will initially examine the feasibility of mitigation and will progress to the next stages, as appropriate.

Hymo 8: A proposed pilot project on the Slaney River at Clohamon will aim to improve fish passage at a medium scale hydroelectric scheme through a state and community collaborative initiative. The pilot project will initially examine the feasibility of mitigation and will progress to the next stages, as appropriate.

Hymo 9: In addition to river barrier removal and mitigation other restoration and mitigation work will be developed. This will be partly guided by the framework for prioritising measures for both river restoration and Nature-based Catchment Management prepared by the EPA. [Timeline: 2026, onwards].

Action 3.10 (Repeated from Chapter 3 for completeness)**:** The Minister for Housing, Local Government and Heritage will undertake a short public consultation before deciding whether to designate or de-designate water bodies as HMWBs. There were 466 water bodies which the EPA has found to meet the criteria for designation. The Minister will take into account the recommendations of the EPA and the key concerns raised in the submissions to the consultation process. [Timeframe Q2-Q3 2024].

Action 3.11 (Repeated from Chapter 3 for completeness)**:** A review of arterial drainage requirements and the underpinning Arterial Drainage Act will be undertaken in order to inform future land use policy decisions arising out of the Land Use Review and to support the preparations for the implementation of the new Nature Restoration Law and the Heavily Modified Water Body review process.

The review will be supported by the OPW and other key stakeholders. Specific tasks will include:

1. Assessing and advising on the implications of different land use policy options in the future, arising out of the Land Use Review, on arterial drainage requirements and the consequential impacts (both positive and negative) on social, economic, climate, biodiversity and water status objectives and outcomes, and
2. Assessing and advising on the legislative changes to the Arterial Drainage Act necessary to (1) support the national land use policy objectives arising out of the Land Use Review, and (2) ensure that future arterial drainage practices are sustainable and support the environmental objectives set out in the 2021 Climate Action Plan, the WFD River Basin Management Plan, the National Biodiversity Action Plan and the related Nature Restoration Law, as well as flood risk management objectives.

3. Forestry

Forestry 1: In support of the Catchment Management Work Plans, the Department of Agriculture, Food and the Marine will publish a Sectoral Action Work Plan. DAFM will update the 2018 document "*Forests and Water: Achieving Objectives under Ireland's River Basin Management Plan 2018-2021*" as the Forestry Sectoral Action Work Plan supporting the third RBMP.

The updated Forests & Water document will include:

- an assessment of the changes in water bodies identified as being at risk from forestry during the second-cycle.
- tabulated actions proposed for the 216 water bodies at risk from forestry, identifying those activities most likely to be the cause of the significant pressure
- details of the assessment and enforcement process that applies to all applications for forest licences (with or without grant aid). This includes: (i) an overview of the detailed level of ecological assessment now applied by c.27 FTE Ecologists, which contributes significantly to the protection of water, through licence conditionality; and (ii) the range of robust standardised requirements applied to all projects, which provide consistency and clarity to foresters and a robust baseline level of protection. In addition;
  - » A number of existing and new restrictions under the new Forestry Programme 2023-2027 now rule out afforestation on a wide range of site types and situations.
  - » DAFM's policy on permanent forest removal is set out in the document *Felling & Reforestation Policy, May, 2017*. Forest removal is considered where overriding environmental concerns exist that cannot be addressed adequately through restructuring at reforestation.

- Where evidence shows that additional, targeted measures beyond standard requirements are needed to address pressures fully, these will be identified and implemented, through licensing.
- The new Forestry Programme includes a number of schemes that can be used within these sub-basins (and elsewhere) to fund changes that protect and enhance water quality. Key among these are schemes funding native woodland creation and continuous cover forestry. In addition,
  - » DAFM is compiling an exhaustive suite of effective mitigation in relation to felling, reforestation and forest roading, to be applied through licensing.
  - » DAFM is working with Waters of LIFE IP partners in trialling various approaches to forestry operations within selected sub-basins of high status water bodies, where forestry is a significant pressure. Experiences from this project and from KerryLIFE, will inform DAFM's ongoing approach.
  - » DAFM is undertaking water monitoring in several heavily-forested catchments, to check the efficacy of various mitigations incorporated into forest management upstream.

[Timescale: 2024 and ongoing, thereafter].

Forestry 2: DAFM recognises the key recommendation from the HYDROFOR Project (2016) to "cease afforestation on peat soils in acid-sensitive headwater catchments", and is applying various water and non-water related policies, procedures and protocols that combine to rule out afforestation on such sites, or to limit it to appropriate multi-benefit native woodland.

Due to a multitude of environmental factors relating to water, biodiversity, carbon, landscape and amenity, and forest operational issues relating to productivity, access and the risk of windblow, DAFM's policy and scheme structure have led to a consistent reduction in the level of afforestation undertaken on peat soils in acid-sensitive headwater catchments over the last 20+ years.

Key elements that ensure that afforestation will continue to move away from such landscapes include various policies now underpinning the Forestry Programme 2023-2027, such as:

- soil-type requirements that rule afforestation ineligible on a wide range of peat site types, driven primarily by carbon budget considerations;
- site fertility requirements, which push afforestation further away from nutrient-poor land; and
- biodiversity-related requirements that overlap strongly with these acid-sensitive headwater catchments, including exclusions relating to SPAs, defined wetland habitats and within 1.5 km of known curlew nesting sites, and procedures regarding sites within the Irish Wetland Survey, sites important for other wader species, and high nature value farmland.

Existing procedures also restrict afforestation within these catchments. First and foremost is the Acid Sensitivity Protocol that rules out commercial afforestation from areas of the country designed by the EPA and others as being acid sensitive. This protocol is based on project-level prescribed water sampling and analyses. Also, of particular relevance is the Habitats Directive Appropriate Assessment Procedure applied to all forestry applications, supported by c.27 FTE Ecologists within the Forestry Inspectorate. While focusing on possible impacts on SACs and SPAs, the process can often rule out afforestation, or severely restrict it, with these catchments, due to the preponderance of hydrological connectivity across the land.

As described, numerous policies and procedures are in place, driven by concerns regarding water, biodiversity, carbon, landscape and other sensitivities, that severely limit afforestation on peat soils in acid sensitive headwater catchments, and these will remain in place throughout the current Forestry Programme. However, DAFM does not pursue a zero afforestation policy in these areas, to allow certain types of afforestation – in particular, native woodland creation – to play a positive role in protecting a multitude of environmental sensitivities within these areas, including water. [Timescale: Ongoing].

Forestry 3: DAFM to increase the area of forests with appropriate water setbacks through the ongoing restructuring of existing forest stands at clearfell / reforestation stage. [Timescale: Ongoing].

Forestry 4: DAFM to ensure the application of water setbacks and other water-based protection during the creation of new forests, principally realised with support under the 2023 – 2027 Afforestation Scheme. [Timescale: Ongoing].

Forestry 5: DAFM to manage the application of support measures that have a clear role in relation to the protection of water, including: the Continuous Cover Forestry Scheme; the various native woodland and agro-forestry options under the Afforestation Scheme, the Native Woodland Conservation Scheme, and the Reforestation for Climate Resilience Scheme. [Timescale: Ongoing].

Forestry 6: DAFM to encourage the uptake of Forest Type 3 under the Afforestation Scheme, aimed at funding native woodland creation on public land, specifically to deliver woodland-based solutions for the protection of drinking water sources and water in general [Timescale: Ongoing].

Forestry 7: DAFM to launch the new Forests for Water option (Forest Type 2) under the Afforestation Scheme, which offers added incentives to farmers and other landowners to promote the creation of new native forests specifically to provide water services, including improvements to water quality, drinking water source protection, natural water retention, the improvement of aquatic and riparian habitats, and the expansion of alluvial woodland. [Timescale: 2024].

Forestry 8: DAFM to continue to address all forestry related water incidents, as identified by DAFM Inspectors and LAWPRO or reported to DAFM Forestry by foresters, water agencies, environmental NGOs and members of the public. (Timescale: Ongoing).

Forestry 9: DAFM to train Registered Foresters, Consultant Ecologists and machine operators, in relation to the design, and implementation of forestry projects, from the perspective of protecting and enhancing receiving waterways. [Timescale: commence from Q3 2024, onwards].

Forestry 10: Continue to seek improvements to the licence applications process for key forestry activities.

4. Urban Wastewater

UWW 1: Uisce Éireann will continue investment in wastewater infrastructure investing over €2.3bn over the period 2020-2024. This includes 108 wastewater treatment plants and 77 collection networks at an estimated cost of €1.542bn and 92 national programmes at an estimated cost of €780m.

UWW 2: Uisce Éireann will deliver infrastructure projects as set out in the Appendices for the next RBMP third-cycle (2022-2027). **[CABL #93]**

UWW 3: Uisce Éireann will assess urban wastewater requirements for the 197 Water Bodies where Urban Wastewater has been identified as a significant pressure by 2027, including any new significant pressure water bodies identified by LAWPRO. **[CABL #93]**

UWW 4: Uisce Éireann will apply for reviews of Wastewater Discharge Authorisations, where required. The applications shall be in a timeframe that is appropriate to the delivery programme and agreed with the EPA.

UWW 5: DHLGH will deliver a multi-annual investment programme to provide wastewater infrastructure for villages not served by public wastewater collection systems.

UWW 6: Uisce Éireann's River Basin Management Plan – Enhanced Ambition Programme will deliver at least 10 new wastewater treatment plant upgrades not funded under the current investment plan where discharges have been identified as being significant pressures on water bodies and impacting on WFD objectives **[CABL #93]**

UWW 7: Uisce Éireann will continue investment in storm water overflows with a minimum of 139 upgrades over the period 2022-2027.

UWW 8: Following the completion of negotiations, DHLGH will undertake transposition into Irish law of the recast Urban Wastewater Treatment Directive.

UWW 9: Following the expected recast Urban Wastewater Treatment Directive the DHLGH will update the criteria for the performance of Combined Storm Water Overflows.

UWW 10: Uisce Éireann will put in place a Research and Innovation Programme on nature-based solutions for small wastewater treatment plants.

UWW 11: As part of the distance to target analysis process led by the EPA, the impact of Sectoral Action Work Plans, including that for urban wastewater discharges, will be assessed as part of the preparation of the 46 Catchment Management Work Plans. Uisce Éireann will publish a Sectoral Action Work Plan. The Sectoral Action Work Plan for urban wastewater discharges will include further detailed information on the targeting of measures to address the 197 water bodies at risk from urban wastewater discharges during the third-cycle.

Where the EPA Distance to target analysis indicates that the achievement of WFD objectives in individual water bodies is not possible by 2027 for reasons of technical feasibility and/or disproportionate costs of delivering urban wastewater treatment improvements, extensions of time may be considered, subject to meeting the relevant criteria in Article 4 of the WFD. The impact of urban wastewater discharges in the vicinity of bathing waters, shellfish waters and designated pearl mussel habitats are being assessed to determine if they are contributing to failures and whether more stringent wastewater treatment standards are required. Uisce Éireann will provide a timeline for both the assessments and the required treatment for all bathing waters, shellfish waters and designated pearl mussel habitats in its Sectoral Action Work Plan. [Timeframe 2024]

UWW 12: Uisce Éireann will engage with LAWPRO with the data required for their work in compiling the 46 catchment work plans and also trialling the Catchment Management Work Plans template in the 5 pilot catchments.

UWW 13: Continue to develop and update the distance to target/Gap Analysis as a tool to reflect Uisce Éireann's understanding of future needs, and consequent investment requirements.

UWW 14: Update the Nutrient Sensitive Areas designations under the Urban Wastewater Treatment Directive.

5. Urban Runoff

Urban Runoff 1: LAWPRO in conjunction with DHLGH to develop recommendations for an implementation strategy for nature-based Sustainable Urban Drainage Systems on a national scale. **[CABL #100]**

Urban Runoff 2: DHLGH to provide interim guidance documentation to the Local and Planning Authorities on measures to be implemented to support the delivery of a greater focus on nature-based solutions in advance of a national implementation strategy. [Note: The interim guidance was delivered in Q4 2021].

Urban Runoff 3: Develop a National Implementation Strategy for Nature-based Sustainable Urban Drainage Systems on a national scale.

Urban Runoff 4: DHLGH to establish a pilot project to investigate solutions to urban runoff using Nature-based Solutions.

Urban Runoff 5: Additional resources will be provided to LAWPRO to provide specialist support to local authorities in adopting international best practice on nature-based surface water management within planning and infrastructure project delivery. (Two staff members by 2025. Cross reference to action under 'Governance/ Implementation' measures on local authority resources)

Urban Runoff 6: The DHLGH will work with NIEA to seek Peace Plus funding projects, which will trial Nature-based Solution measures and sustainable technologies.

Urban Runoff 7: Review of outcomes of the Dublin Urban Rivers Life project.

Urban Runoff 8: Oversee the preparation of integrated urban drainage management plans.

6. Domestic Wastewater Discharges (Septic Tanks)

Domestic WW 1: DHLGH will continue to promote and monitor the uptake of the new grant schemes to ensure adequate numbers of people are availing of this measure. A research project will be initiated under the ESRI Research Programme on behaviours and attitudes to assess the level of uptake, impediments to uptake and to make recommendations for improving uptake. (Timescale 2024).

Domestic WW 2: A review of the National Inspection Plan (NIP) 2018-2021 was completed, with the outcome informing the next NIP for the period 2022-2027. An objective of these plans is to prioritise inspections to areas of greatest environmental and public health risk and secure upgrading works where required.

Domestic WW 3: Local authorities to engage with householders to improve general awareness of septic tank maintenance requirements, and to address any failing septic tanks

Domestic WW 4: Local authorities to complete 5,800 inspections between 2022 and 2026 under the National Inspection Programme.

Domestic WW 5: The Department of Housing, Local Government and Heritage to issue a policy direction to Local Authorities regarding Advisory Notices and Local Authorities to enforce advisory notices under the National Inspection Plan.

Domestic WW 6: DHLGH to consider the outcomes of the research project into the application of zero discharge nature-based solutions and their applicability or not within Ireland's climatic conditions.

Domestic WW 7: Review the outcomes of the pilot projects under the first multi-annual Developer-Provided Water Services Infrastructure Resolution Programme to inform future policy considerations on resolving sub-standard developer provided infrastructure with sustainable solutions.

7. Unknown Pressures

Unknown 1: The Local Authority Waters Programme (LAWPRO) will conduct assessments of water bodies in Priority Areas for Action where the pressures are unknown to identify the specific issues and actions that are required to protect or restore water quality as necessary.

Unknown 2: Each local authority supported by LAWPRO will conduct assessments of other water bodies where the pressures are unknown (which are not within priority areas for action) to identify the specific issues and actions that are required to protect or restore water quality as necessary.

Unknown 3: The Local Authority Services National Training Group (LASNTG) will provide appropriate training programmes including on Catchment assessment, Integrated Catchment Management, and farm inspections for the staff of local authorities and all implementing bodies.

8. Other Pressures

Other 1: DHLGH will prepare a proposal for enacting abstraction regulations. (Target: End of Q2 2024)

Other 2: The EPA, as competent authority will work with stakeholders to identify mitigation measures for abstractions determined to be significant pressures, and through the abstraction licensing process, require the implementation of relevant mitigation measures.

Other 3: The need for exemptions will be reviewed as the abstraction licensing process is rolled out.

9. Peatlands

Peat 1: Measures set out in the National Peatlands Strategy to be updated into a new Implementation Plan by NPWS.

Peat 2: In support of the Catchment Management Work Plans, the NPWS will publish a Sectoral Action Work Plan. Measures set out in the National Peatlands Strategy to be updated into the Sectoral Action Work Plan Plan by NPWS.

Peat 3: Continuation and expansion of NPWS national programme of peatland restoration on SAC and NHA raised bogs, blanket bogs and fens.

Peat 4: Bord na Móna to oversee the EU LIFE Integrated Project "Peatlands and People".

Peat 5: NPWS and Geological Survey Ireland to fund an investigation into the causes of blanket bog landslides that occurred across Ireland in 2020, and the vulnerability of other at-risk areas to future failures.

Peat 6: DAFM to oversee the implementation of sustainable management practices developed through the Blackstairs Mountains and Wicklow Mountains EIP projects within the ACRES East/ South East Cooperation Project zone.

Peat 7: Continuation of the Bord na Móna operated Enhanced Decommissioning, Rehabilitation and Restoration Scheme (EDRRS) to H2 2026.

Peat 8: Continuation of NPWS-led EU LIFE IP Wild Atlantic Nature programme, including the development of complementary projects such as enhancing restoration capacity through building projects such as *Natura Communities*, retrofitting programmes to reduce turf cutting in the Natura 2000 network of sites and development of a nature restoration programme compatible with Ireland's CAP Strategic Plan.

10. Industry, Mines and Quarries

IMQ 1: DHLGH will examine opportunities to further support businesses in taking on a water stewardship approach in their operations.

Action 5.2 (Repeated from Chapter 5 for completeness)**:** The National Technical Implementation Group will identify the issues preventing water quality objectives from being achieved and will identify any further evidence, legislative, policy or implementation gaps that need to be addressed.

11. Drinking Water Source Protection

Drinking Water 1: Development of Drinking Water Source Protection Framework and Guidelines to meet the requirements of the recast Drinking Water Directive, and incorporating the application of abstraction controls under the implementing regulations for the Water Environment (Abstractions and Associated Impoundments) Act 2022.

Drinking Water 2: A Sectoral Action Work Plan for Drinking Water will include measures and plans to address the source protection actions proposed under the Drinking Water Regulations. It will be coordinated by the DW Expert Group with support from Uisce Eireann, NFGWS and LAs.

12. Invasive Alien Species

Invasive 1: Finalise legislation for the implementation of the EU Invasive Alien Species (IAS) Regulation (Timeframe – 2024).

Invasive 2: Implementation of existing management plans and Priority Pathway Action Plans (PPAP) for priority invasive species, and drafting of a new PPAP for Soils and Spoil [see www.invasives.ie].

Invasive 3: In support of the Catchment Management Work Plans, the NPWS will publish a Sectoral Action Work Plan, which will include for the implementation of existing management plans and Priority Pathway Action Plans (PPAP) for priority invasive species, and drafting of a new PPAP for Soils and Spoil.

Invasive 4: Complete negotiations on the recruitment of additional Biodiversity Officers.

The Programme for Government includes a commitment to ensure that each Local Authority has a sufficient number of Biodiversity Officers and Heritage Officers among their staff complement. The Biodiversity Officer Programme is being delivered by the Heritage Council, which is funded by the National Parks and Wildlife Service. There are currently 24 Biodiversity Officers in place in 20 local authorities, of which 16 are under the Heritage Council programme. A further five Biodiversity Officers will start under the Heritage Council programme in early 2024 with plans to have a Biodiversity Officer in each Local Authority by the end of 2024.

Invasive 5: Include action on Invasive Alien Species (IAS) as a priority under the Local Authority Biodiversity Grant Scheme. The Local Biodiversity Action Fund provides Local Authorities with funding to target actions in the National Biodiversity Action Plan. Projects that include the mapping and appropriate treatment of IAS are listed as priorities within this funding stream.

Invasive 6: Develop a National Management Plan for Invasive Alien Species, and bring to public consultation in early 2024.

13. Hazardous Chemicals in the Aquatic Environment

HazChem 1: DHLGH will amend the EQS Regulations to take account of the assessment of River Basin Specific Pollutants (RBSPs) by the National Aquatic Environmental Chemistry Group (NAECG)

HazChem 2: DHLGH and EPA will input into the recently commenced EU work to revise the list of Priority Substances and Priority Hazardous Substances. This will include liaison with the EU Commission in relation to the proposed amendments to the EQS Directive.

HazChem 3: Teagasc, ASSAP and DAFM, with support from LAWPRO, will implement specific actions in high risk catchments to protect water quality from toxic impacts arising from the handling, use and disposal of sheep dip.

14. Aquaculture

Aqua 1: *Review of consents causing impacts:* DAFM will conduct a periodic review, and where necessary, update of controls contained in aquaculture consents. [Timeframe – 2024]

Aqua 2: *Enhanced integration of WFD into Aquaculture Consents*: DAFM to enhance links between the aquaculture authorisation and the objectives of the Water Framework Directive. [Timeframe – 2024]

Aqua 3: *Online Aquaculture licensing:* To encourage the active involvement of all interested parties DAFM is to launch an online mapping viewer of licensed aquaculture sites in Ireland including access to licence and licence application information [Timeframe – 2024]

Aqua 4: *Enhanced Protection for Designated Shellfish Production Areas*: DHLGH will examine the need for amendments to legislation and whether a new management framework for shellfish waters in Ireland is needed. [Timeframe – 2026]

Aqua 5: Complete the National Strategic Plan for Sustainable Aquaculture, including water quality measures.

15. Land Use Planning
Land-Use 1: Finalise guidelines for the incorporation of the Water Framework Directive considerations into the planning system and roll out of training on the new water and planning guidelines to practitioners. **Land-Use 2:** Legislative provision to give effect to the new Water and Planning Guidance to be progressed

Coastal and Transitional Waters – How measures will contribute to their protection and restoration

Protecting and restoring Estuarine and coastal waters

Ireland's coastal and marine areas provide us with vital environmental, recreational, cultural and economic goods and services. Our actions, both positive and negative, can impact on the wellbeing of these important ecosystems. According to the EPA[12] approximately 40% of the Irish population lives within 5 kilometres of the coast. Our marine ecosystems can be damaged by human-induced pressures and pollution, which can be of both global (e.g. climate change, marine litter, fisheries) and local (e.g. industry, agriculture, domestic wastewater) origin. Although Ireland's offshore waters can be considered relatively clean in terms of eutrophication and contaminants (however biodiversity is not good), our nearshore coastal systems are less so largely due to land based activities. Therefore, addressing water quality issues in our marine and coastal water bodies is reliant on improved management on land.

The Marine Strategy Framework Directive (MSFD) has similar aims to the WFD for the protection of the marine environment beyond the areas considered under the WFD. It requires the application of an ecosystem-based approach to the management of human activities, enabling a sustainable use of marine goods and services. It requires Ireland to describe, monitor and assess what are clean, healthy and productive seas, i.e. *Good Environmental Status* (GES), and ensure that appropriate action is taken by 2020 to maintain or achieve this status. The Department of Housing, Local Government and Heritage is the lead body for the implementation of the MSFD and the WFD. It is supported by a number of other departments and state agencies.

Ireland's Marine Strategy Part 1 (2020) identified the status of Ireland's marine environment and the gaps to achieving GES. To close the gaps, Ireland has revised its Marine Strategy Part 3: Programme of Measures (PoMs); first developed in 2015. The updated PoMs includes 153 measures, reflecting the consolidation of 227 existing measures brought forward from 2015 to 112, the modification of 28 measures and development of 12 new measures. A 12-week public consultation on these measures was conducted in 2022, with specific focus on the measures Ireland intends to put in place to achieve GES. For the first time, the updated PoMs includes consideration of climate change through the development of Nature-based Solutions and Marine Protected Areas which will both consider carbon storage and the resilience of ecosystems to climate change and ocean acidification.

One of the key measures within the new MSFD PoMs (M011) is the Water Framework Directive (2000/60/EC) River Basin Management Plan, in which it acknowledges the measures contained within the plan, which aim for the achievement of Good Ecological Status of coastal and transitional water bodies. There are also other common areas of interest and associated measures between the MSFD PoMs and the RBMP in the following areas:

- Agriculture (specific references to the Nitrates Action Programme, CAP Strategic Plan, Rural Development Programme and Green Low-Carbon Agri-Environment Scheme, pesticide control in MSFD PoMs);
- Urban Wastewater;
- Urban Runoff Pressures (specific reference to Nature-based Solutions and CSOs in MSFD PoMs);
- Invasive Alien Species; and
- Aquaculture.

All RBMP measures for these pressures will both directly and indirectly benefit the marine environment as upstream mitigation measures facilitate the protection of transitional and coastal water bodies downstream.

Ireland has made a commitment under the MSFD PoMs to develop Nature-based Solutions for sequestering nutrients. By 2028, Ireland will develop nature-based solutions to reinstate and safeguard the natural capacity of ecosystems to supply regulating ecosystem services including the sequestration of nutrients. This will be undertaken through a regional approach under OSPAR Objective S1O6. The roadmap to developing these solutions will include three steps: improving the knowledge base, identifying suitable habitats for protection and restoration, and augmenting implementation. This action was launched with a national workshop in

12 Ireland's Environment – An Integrated Assessment 2020. Environmental Protection Agency.

January 2023 and will be undertaken in support of the RBMP in suitable coastal ecosystems.

Ireland's marine plan, the National Marine Planning Framework (NMPF)[13], was established on a statutory basis in 2021. The NMPF fulfils Ireland's commitments under EU Directive 2014/89/EU, the Maritime Spatial Planning Directive (MSPD). The NMPF includes all of Ireland's maritime area, beginning at the high tide limit, including estuaries. Aligned with the MSFD and the WFD, marine planning in undertaken incorporating an ecosystem-based approach. The parts of the NMPF focussing most strongly on environmental matters, chapters under "Environmental – Ocean Health", are structured to reflect and support activity under the MSFD with content aligned with GES descriptors.

The MSFD, the NMPF and RBMP support the actions within the National Biodiversity Action Plan and the Climate Action Plan.

Integrated Catchment Planning and the collaborative implementation

Many of the measures outlined in this River Basin Management Plan are designed to benefit estuarine and coastal waters as well as inland waters. The integrated catchment management based approach considers all waters together from source to sea, as they are ultimately connected (groundwater, rivers, lakes, estuaries and coastal waters). The preparation of the 46 Catchment Management Work Plans includes consideration of all pressures in a catchment area impacting on the status of all receiving waters, including downstream estuaries and coastal water.

The revised River Basin Management governance structures arising from cycles 1 and 2 have significantly improved the level of coordination and collaborative work over time by all implementing bodies at national, regional and catchment levels, making optimal use of existing and enhanced governance structures and resources. Local government has a key leadership role in the stewardship of water catchments and of particular importance is clarity about the respective roles of local government and other authorities. There is considerable overlap in the stakeholders involved in monitoring, assessing and managing inland waters and coastal waters.

Tackling eutrophication

The increase in excess nutrient pollution (phosphorus and nitrogen) in our rivers and lakes has led to a subsequent increase in the nutrients flowing into our marine environment. Over the last decade, the amounts of nitrogen, in particular, and phosphorus flowing into estuaries have increased by 20% and 37%, respectively. The ecology of estuaries, particularly in the south and southeast, is being damaged by these high nutrient inputs.

Measures planned under agriculture will be critical to reversing this trend in the third-cycle. These include tighter restrictions on nitrogen inputs to agricultural systems and enhanced environmental enforcement under the Good Agricultural Practices Regulations. There are also significant new measures provided for under the new Common Agricultural Policy Strategic Plan designed to support and incentivise farmers to take voluntary enhanced environmental measures beyond mandatory requirements. Uisce Éireann will continue its high rate of investment in wastewater infrastructure which will contribute to achieving full compliance with the Urban Wastewater Treatment Directive and the consequent reduction in pollutant loads to marine waters. This investment includes approximately €2.3bn over the period 2020-2024. This includes 108 wastewater treatment plants and 77 collection networks at an estimated cost of €1.542bn and 92 national programmes at an estimated cost of €780m. Planned infrastructure projects are set out in Appendix 6 for the next RBMP cycle (2022-2027).

Managing other pressures on estuaries and coastal waters

Other activities potentially posing environmental pressures on marine waters within the one nautical mile off shore limit of the WFD include near and on shore physical development and fin-fish aquaculture.

In line with the requirements of EU Directive 2014/89/EU (Maritime Spatial Planning Directive), the Minister for Housing, Local Government and Heritage formally established the National Marine Planning Framework (NMPF) in 2021. Under Part 2 of the Maritime Area Planning Act 2021 (as amended), the Minister for Housing, Local Government and Heritage is the competent authority for the purposes of the Directive and, by extension, for purposes of preparing Ireland's first marine spatial plan. The NMPF brings together all marine-based human activities for the first time, outlining the Government's vision, objectives and marine planning policies for each marine activity.

13 National Marine Planning Framework: https://www.gov.ie/en/publication/60e57-national-marine-planning-framework/; MarinePlan.ie – A digital tool for navigating the NMPF, its policies and spatial data: https://marineplan.ie/.

Marine Spatial Planning (MSP) forms the basis of a new, plan-led way to manage the maritime area and to plan how best to use resources into the future. MSP will enable balancing of different demands for using the sea including the need to protect the marine environment. It involves planning when, where and how human activities take place at sea. It's about ensuring these activities are as efficient and sustainable as possible. Marine spatial planning involves stakeholders in a transparent way in the planning of maritime activities. The NMPF recognises the importance of and role of RBMPs with numerous references and ensures consideration of them e.g. citing RBMPs in policies related to Wastewater Treatment and Disposal.

Fin-fish aquaculture is a significant water management issue in terms of its potential impacts on water quality. The potential impacts 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, if not management effectively. Aquaculture is licenced under the Fisheries (Amendment) Act, 1997, the Foreshore Act 1933 and applicable National and EU legislation, including EU environment protection Directives. Concerns relating to the effectiveness of the overall licensing process in assessing the impact of aquaculture activities on the water environment were raised by a number of stakeholders during the RBMP consultation phases. The section on Aquaculture in this plan sets out the actions to undertaken to ensure that fin fish aquaculture is managed sustainably.

Coastal waters contain a number of protected areas types, including; bathing waters, shellfish waters and areas protected under the Birds and Habitats Directives. These protected interests have legal requirements for protection measures in their own right. However, the river basin management process provides the opportunity to introduce a more comprehensive and integrated approach to their effective management.

In December 2022 government approved the General Scheme of stand-alone Marine Protected Areas Bill.

Coastal Action 1: Marine Protected Areas (MPAs) which are within the areas covered by the WFD (up to one nautical mile off shore) will be incorporated into the register of protected areas under the WFD, once the legislation is enacted.

The water status objectives of all protected areas are included in the river basin planning process. They will be incorporated into the appropriate plans for each of the 46 Catchment Management Work Plans for the purpose of managing the environmental pressures impacting on their water quality requirements.

Maritime Area Regulatory Authority (MARA)

The Maritime Area Regulatory Authority (MARA) is a new state agency that was established in July 2023, under the aegis of the Department of Housing, Local Government and Heritage. It's functions are set out in the Marine Area Planning Acts 2021 and 2022, and it will have a key role in the new streamlined consenting system for the maritime area, including:

- Granting all Maritime Area Consents (MACs) for the maritime area;
- Granting marine licensing for specified activities;
- Compliance and enforcement of MACs, licences and offshore development consents;
- Investigations and prosecutions;
- Administration of the existing Foreshore consent portfolio; and
- Fostering and promoting co-operation between regulators of the maritime area.



6

Implementation and Governance

Governance

The OECD Principles on Water Governance highlights three mutually reinforcing and complementary parts to water governance, which are intended to contribute to tangible and outcome-orientated public policies, and to improve the 'Water Governance Cycle' from policy design to implementation.[14]

Effectiveness relates to the contribution of governance to define clear sustainable water policy goals and targets at all levels of government, to implement those policy goals, and to meet expected targets.

Efficiency relates to the contribution of governance to maximise the benefits of sustainable water management and welfare at the least cost to society.

Trust and Engagement relate to the contribution of governance to building public confidence and ensuring inclusiveness of stakeholders through democratic legitimacy and fairness to society at large.

The work of the implementation structures will be underpinned by these principles and will adopt the concept of an evolutionary form of governance that will review and adapt its roles and functions in response to the changing dynamics and pressures that may emerge over the third-cycle.

The second RBMP cycle entailed a complete change of approach to the overall river basin management planning process compared to the first-cycle. In basic terms the following three-tier structure (Figure 28) was adopted across the relevant implementation bodies.

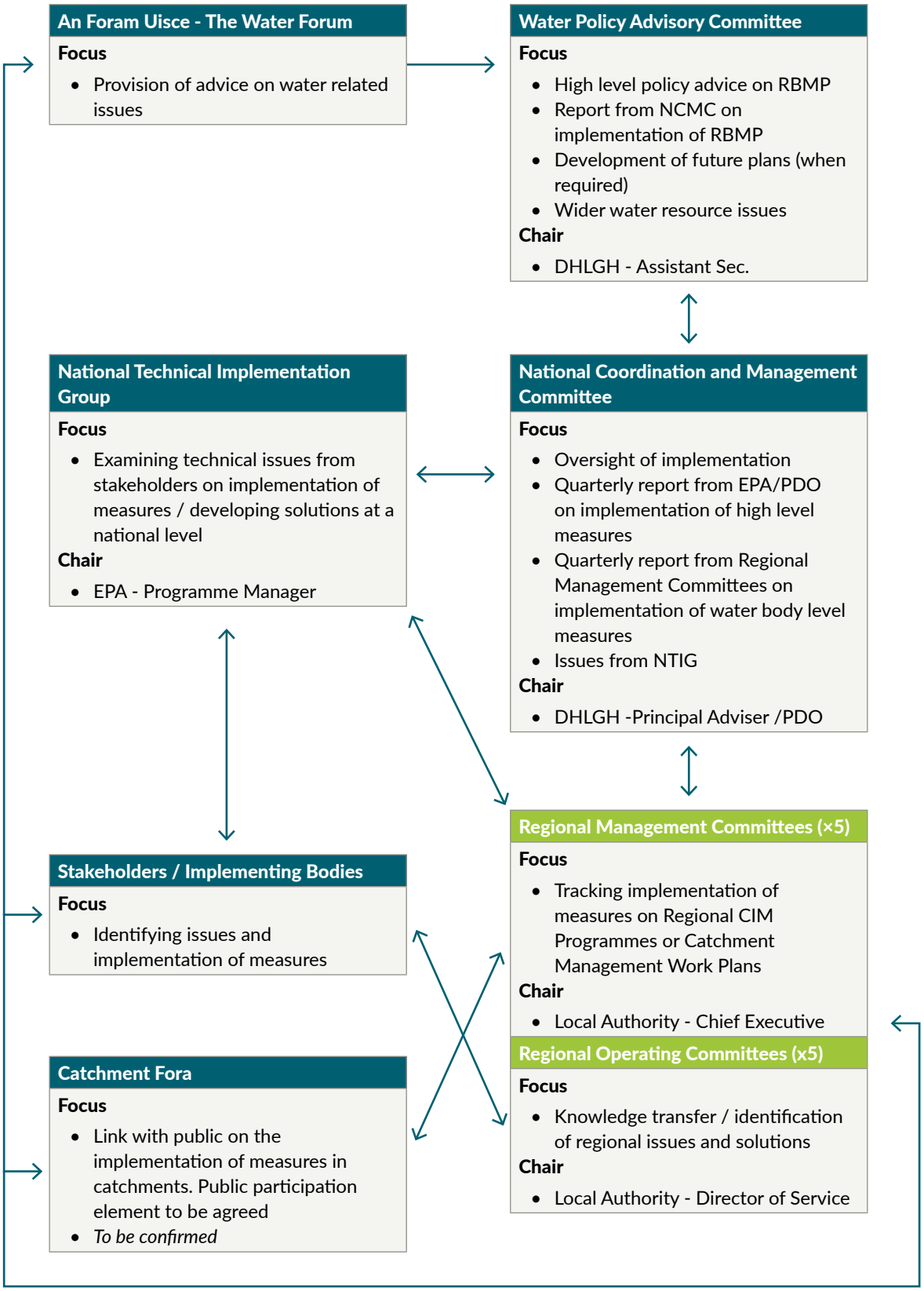
While the working arrangements are set out formally, the successful implementation of the plan will require integrated and co-operative working relationships between stakeholders. During the third-cycle, the implementation structures will be developed to build on what has been learned during the previous two cycles. Figure 29 shows the enhanced working arrangements and roles for the third-cycle.

Figure 28: High Level Implementation Structures

Tier 1 **National Management and Oversight**	Minister for Housing, Local Government and Heritage	Policy, necessary legislation and ensuring appropriate resourcing of the Plan across Government Departments. Supported by the cross-government Water Policy Advisory Committee established to advise the Minister.
Tier 2 **Technical implementation and reporting**	Environmental Protection Agency (EPA)	The catchment characterisation process, overseeing the national monitoring programme, chairing the National Technical Implementation Group and assisting and advising the Minister.
Tier 3 **Regional Implementation**	Local authorities	Each local authority with the support of the LAWPRO shared service is responsible for co-ordinating the implementation of measures within its functional area. This includes the direction of implementing bodies.

14 OECD Principles on Water Governance, page 3 & 4

Figure 29: WFD Implementation Structures and their Interactions



The **Water Policy Advisory Committee** (WPAC) provides high-level policy advice on the direction and oversight of implementation of the River Basin Management Plan. The WPAC also advises the Minister with regard both to progress of the plan and to the preparation of programmes of measures necessary to achieve the environmental objectives, while also examining wider water resource issues. The WPAC is chaired by a representative of the Minister. During the third-cycle a standing item on the WPAC agenda will be regular reporting from the National Co-ordination and Management Committee on the implementation of the RBMP measures. WPAC will meet at least three times per annum.

An Fóram Uisce (the Water Forum), established in 2017, is an independent entity with broad functions that include advising the WPAC in relation to river basin management plans, on matters pertaining to the objectives of the WFD, and on related matters concerning the management of Ireland's water resources. The Forum provides an interface between science, citizen/stakeholder engagement and water policy. As part of the enhanced governance structures under the third-cycle the Forum will have increased engagement opportunities with WPAC through the ex-offico participation of the Forum's Chairperson at WPAC meetings. The Forum will also have an increased engagement with the regional structures, specifically with the regional management committees. The Forum will also identify and advise on the optimum level of engagement with the implementation bodies, agencies and structures for the WFD to support implementation of the third-cycle.

A **National Co-ordination and Management Committee** (NCMC) has been set up to ensure that the measures necessary to achieve the Plan's objectives are implemented in an efficient, effective and co-ordinated way. The NCMC provides the necessary interface between science, policy and programme delivery. It was established to oversee the overall work programmes and report to the WPAC on progress. The NCMC is chaired by the DHLGH and comprises representatives of the DHLGH, the Environmental Protection Agency (EPA) and the chairs of the regional committees. In the third-cycle, NCMC will be chaired by the Programme Delivery Office lead. Standing items on the NCMC meeting agendas will be reports from the Programme Delivery Office, LAWPRO and the EPA through the National Technical Implementation Group on the implementation of measures, and reporting from the Regional Management Committees to focus on tracking of the implementation of measures through regional programmes or the new Catchment Management Work Plans.

A **National Technical Implementation Group** (NTIG) provides a forum for all relevant State actors to coordinate, share knowledge on, and resolve technical issues arising with the implementation of measures under the Plan. It also addresses any operational barriers to implementation that may arise. Chaired by the EPA, the membership includes all the relevant implementation bodies for the WFD. Updates on the implementation and effectiveness of measures, or issues arising are provided to the NCMC and WPAC as necessary. The NTIG group will continue to have the structures and resources of NIECE (Network for Ireland's Environment Compliance and Enforcement) available to it.

The Environmental Protection Agency is the body that is statutorily responsible for reporting on the WFD. The EPA co-ordinates the ongoing tracking of the implementation of actions and, in conjunction with others and by means of the monitoring programme, undertakes the assessment of the effectiveness of those actions in terms of water quality outcomes. The NTIG group will continue to have the structures and resources of NIECE (Network for Ireland's Environment Compliance and Enforcement) available to it, as well as the Catchment Management Network.

Local authorities are key implementing bodies for the Water Framework Directive in Ireland and each local authority has a duty to exercise its functions in a manner which is consistent with the provisions of the Directive, and which achieves or promotes compliance with the requirements of the Directive. Each authority must also take such actions as may be appropriate in the context of its functions to secure compliance with the Directive, and with the provisions of this river basin management plan and the programme of measures established.

To assist each individual local authority meet its statutory duty, local authorities have agreed cooperative regional and national structures. This includes five local authority regional committees, to set priorities and drive delivery of supporting measures at local authority level.

This work is further supported by the **Local Authority Waters Programme** (LAWPRO). The five Regional Committees are chaired at Chief Executive level, with active participation and technical advice from the EPA. Each committee is supported by an Operational Committee with membership drawn from all the relevant public and implementing bodies and chaired at Director of Service level. The local authority structures are central to tracking the progress and effectiveness of implemented measures and have a vital role in supporting national policy development and implementation through their participation in the WPAC and the NCMC. The review of the Local

Authority resources and governance structures that is being undertaken will determine the future appropriate resources and structures to be put in place to support individual local authorities in fulfilling their role in water quality protection and restoration. The role and responsibilities of the Local Authorities and other implementing bodies will be further clarified in the individual 46 Catchment Management Work Plans.

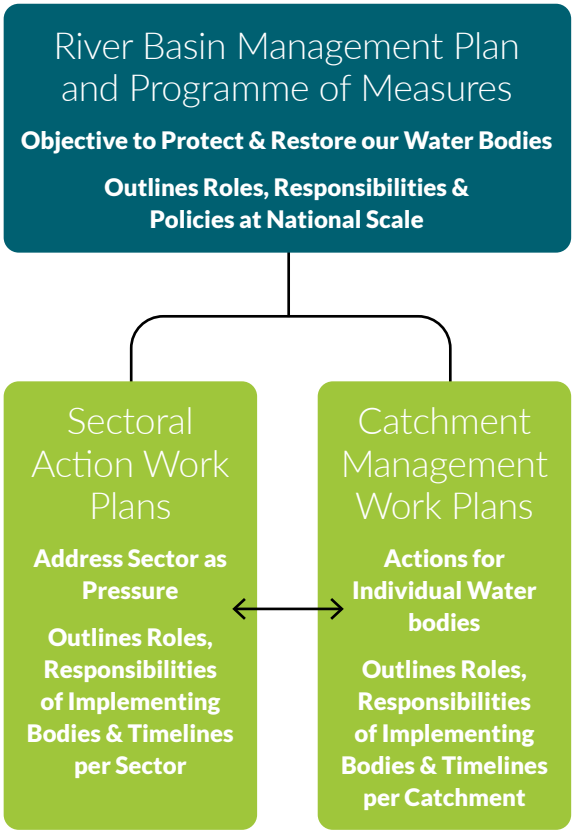
LAWPRO has an important role to facilitate and ensure public participation in the implementation of measures at a local level. LAWPRO also provides localised scientific analysis of pressures in the priority areas for action. LAWPRO will also prepare the template for the 46 Catchment Management Work Plans and coordinate the delivery of measures identified in these Plans.

Catchment Management Work Plans & Sectoral Action Work Plans

The purpose of the Catchment Management Work Plans will be to share information on catchment characteristics, current water quality issues and pressures, while also setting out the actions identified by implementing bodies required for the water bodies in the catchment. The Catchment Management Work Plans will outline the objectives and specific actions for each of the catchments, while also confirming roles and responsibilities for the implementation of the measures and providing scientific evidence at a water body scale.

The catchment scale plans are dynamic management tools and will evolve with increasing detail, commencing at the catchment level. The catchment plans will have multiple aims, including making a direct link between the RBMP and its Programme of Measures, thereby drawing from the strategic objective of protecting and restoring our water bodies. There will also be a direct connection with the Sectoral Action Work Plans, whose aim is to address the negative effects of individual pressures on water quality. The measures outlined in the Sectoral Action Work Plans will support, and will be incorporated into the Catchment Management Work Plans, to ensure an integrated catchment management approach and ensure effective management of actions across each of the responsible implementing bodies.

Figure 30: Relationship between RBMP and Sectoral Action Work Plans and Catchment Management Work Plans



LAWPRO is overseeing their development and implementation and will prepare a template for the Catchment Management Work Plans by Q2 2024. LAWPRO is trialling a template in five catchments, one in each of the five LAWPRO regions (Border, Midlands & East, South East, South West and West). The core aim of the five pilot catchments is to trial a formal method for the gathering and dissemination of information on the catchment characteristics and water quality issues, with a system for tracking actions and activities, by implementing bodies and the community, to protect and improve water quality. The pilot process will help develop the Catchment Management Work Plan framework and will also include developing the data capture requirements. This will ultimately inform the template for the Catchment Management Work Plans. The Catchment Management Work Plans will include the list of water bodies, their associated status, significant pressures/ issues and targeted measures, along with outcomes-based targets for the third-cycle and key performance indicators to monitor progress and outcomes. Justification for water bodies not meeting their WFD objective by 2027 will also be included in Catchment Management Work Plans, in line with Article 4 of the WFD.

Action 6.1: LAWPRO will oversee the development of the template for the 46 Catchment Management Work Plans by Q2 2024.

Action 6.2: Implementing Bodies to engage with LAWPRO with the data required for their work in compiling the 46 Catchment Work Plans and also trialling the CMWP template in the 5 pilot catchments.

Sectoral Action Work Plans

In addition to the Catchment Management Work Plans, there will be Sectoral Action Work Plans developed for the key sectors. Each Sectoral Action Work Plan will be a fundamental aspect of the Catchment Management Work Plans and set out the relevant actions to be tracked both in terms of activity and on the ground implementation of measures.

Sectoral Action Work Plans will be developed using a consistent template, which will be delivered by Q3 2024, and which is aligned with the WFD, the objectives of the RBMP and which links specific actions to pressures. The development of the template will be a collaboration between DHLGH and LAWPRO, involving bi-lateral meetings with stakeholders early in 2024. The objective of all Sectoral Action Work Plans will be to ensure the sector will no longer be a significant pressure on water status. Each Sectoral Action Work Plan will include information on how the sector will address all water bodies at risk from that pressure with a plan to develop evidence-based targeted restoration measures. The plans will also identify protection measures to ensure no additional water bodies are put at risk from that sector. The objectives and actions of each Sectoral Action Work Plan will contribute to the development and implementation of objectives and actions at a catchment scale through the Catchment Management Work Plans.

Where the sector is the sole pressure, clear reasoning for where the required objective of water bodies cannot reasonably be achieved by 2027, for example due to technical infeasibility or data/assessment requirements, will also be included (as required by Article 4, Section 4 of the WFD). Sectoral Action Work Plans will comply with the legally binding general duties on public authorities under Article 3(1) of the 2003 Water Policy Regulations (SI 722 of 2003). LAWPRO is overseeing the development and implementation of the Sectoral Action Work Plans, with the aim of producing a plan for each sector as outlined in Table 14.

Data Management and Reporting

The Water Framework Directive application – the WFD App – has been developed by the EPA to facilitate the sharing and reporting of environmental data collection by the organisations involved in the national monitoring programme. For this cycle, the application will be enhanced to allow the tracking of implementation, including both protection and improvement actions, as this is central to the CMWP framework. Any actions undertaken by communities will also be recorded where these are reported to local authorities. This data system will centralise all relevant information from implementation bodies on the measures planned, underway and complete.

The EPA will aim to improve access to information on progress with the implementation of measures through the reporting of Key Performance Indicators (KPIs) and targets in the programme of measures in the third River Basin Management Plan cycle. Regional Committees and the NCMC will evaluate implementation performance on an ongoing basis. The EPA will continue to report on water quality and water quality trends, and will review data on the WFD App to improve the accessibility and visibility of water body level data on monitoring and actions to the public through the catchments.ie website. The EPA will work with interested stakeholders to optimise access to catchment datasets.

Each sector will report on implementation at site or water body scale. Sectoral Action Work Plans will be developed for the following key sectors, to start with:

Table 14: List of Sectoral Action Work Plans

Sector	Lead authority	Publication Date
Agriculture	DAFM, Teagasc	Q1 2025
Hydromorphology	DHLGH, IFI, OPW, DAFM	Q1 2025
Forestry	DAFM – Forest Service	Q1 2025
Urban Wastewater	Uisce Éireann	Q1 2025
Peat	NPWS, Bord na Móna, Local Authorities	Q1 2025
Drinking Water Source Protection	NFGWS, Uisce Éireann, Local Authorities	Q1 2025
Invasive Alien Species	NPWS, Local Authorities	Q1 2025

Further Enhancements to the Water Sector Governance

The Institute of Public Administration has conducted a series of research reports under the EPA's research programme, including an assessment of water governance in Ireland. This research used the Water Governance Indicator Framework (Using the OECD Water Governance Indicator Framework to Review the Implementation of the River Basin Management Plan for Ireland 2018–2021[15]), a tool developed by the Organisation for Economic Co-operation and Development (OECD). The OECD produced this tool in 2018 to assist countries in assessing their progress towards the WFD goals. The IPA report puts a particular emphasis on informing future policy and practice to help inform policy decisions on the governance arrangements for the third-cycle plan.

This formed a key part of a two year research programme on experimental governance and water governance (Water Governance in Ireland: Towards the Third-Cycle River Basin Management Plan, 2022-2027[16]), that was aimed at drawing out wider learning from the study of water governance and is of relevance to the development of policy and practice in other areas of public reform.

These reports and three further complementary reports are available on EPA.ie: one examining Ireland's water governance arrangements using an experimental governance lens (Using an Experimental Governance Lens to Examine Governance of the River Basin Management Plan for Ireland 2018–2021[17]), another studying two local case studies of local water catchment groups (Case Studies on Local Catchment Groups in Ireland, 2018–2020[18]) and a final one investigating the operation of the Water Forum (An Fóram Uisce) (An Fóram Uisce (The Water Forum) as an Example of Stakeholder Engagement in Governance[19]).

The OECD Water Governance Indicator Framework seeks to enable a transparent, neutral, open, inclusive and forward-looking dialogue across stakeholders on what does and does not work, what should be improved and who can do what. The IPA study finds that the new governance structures put in place under the second-cycle RBMP go a significant way towards achieving the objectives contained in the Water Governance Indicator Framework. There is considerable reassurance for those involved that the structures put in place in Ireland around water governance are appropriate and that there are no significant gaps or omissions. Having said that, the IPA is making specific recommendations for improvements in Irish water governance arrangements for each of the principles.

The research finds that benefits may be achieved by the different elements of the governance structures reviewing their terms of reference in the second-cycle RBMP and refreshing their approach.

As part of the evolution of the governance structures during the third-cycle, a review of the Terms of Reference of WPAC and the NCMC will be undertaken to refocus their objectives and purpose and to ensure the successful roll-out and implementation of the integrated Catchment Plans by providing clarity on roles and responsibilities throughout the governance tiers. As outlined earlier the relationship between WPAC and An Forúm Uisce will also be further enhanced through attendance by the Chairperson of the Forum at WPAC meetings and through the agreement of a Memorandum of Understanding between the two bodies. In addition, more robust monitoring of and reporting on progress in respect of the implementation of the RBMP is identified as a key finding.

Programme Delivery Office

To ensure ownership of the RBMP and to develop more effective communication across the governance structures, a newly formed section within DHLGH's Water Division, the Programme Delivery Office (PDO) will support the implementation of the next River Basin Management Plan across Departments, Local Authorities, EPA and other key agencies and stakeholders, and will provide clarity and direction to the various implementation bodies responsible for ensuring the protection and restoration of our waters to good ecological status.

The Programme Delivery Office will support the existing structures to oversee and coordinate the implementation of actions contained in the Programme of Measures where each action will be assigned a lead body responsible for their implementation and an agreed date of delivery. The Programme Delivery Office will engage with

15 Using the OECD Water Governance Indicator Framework to Review the Implementation of the River Basin Management Plan for Ireland 2018–2021. https://www.epa.ie/publications/research/water/Research_Report_372.pdf

16 Water Governance in Ireland: Towards the Third-Cycle River Basin Management Plan, 2022-2027. https://www.ipa.ie/_fileUpload/Documents/EPA_WATERGOVERNANCE_FINAL.pdf

17 Using an Experimental Governance Lens to Examine Governance of the River Basin Management Plan for Ire-land 2018–2021 https://www.epa.ie/publications/research/water/Research_Report_373.pdf

18 Case Studies on Local Catchment Groups in Ireland, 2018–2020 https://www.ipa.ie/_fileUpload/Documents/Local_Catchment_Groups_in_Ireland_May2021.pdf

19 An Fóram Uisce (The Water Forum) as an Example of Stakeholder Engagement in Governance https://www.ipa.ie/_fileUpload/Documents/EPAIPA%20Water%20Forum%20Report%20Web.pdf

the implementing bodies on an ongoing basis, documenting the engagement to allow for progress, and any potential issues arising, to be highlighted through the agreed structures. A significant function of the office will be to facilitate continuous engagement between the different strands of the RBMP implementation process, and it will look to increase communication between the various implementation bodies who will contribute to the delivery of the required measures.

The Programme Delivery Office will also coordinate publication of progress reports, to ensure effective implementation of these actions, which will clearly and comprehensively set out performance against targets, to allow for increased stakeholder engagement. The publication of these reports will be managed by the Programme Delivery Office through a dedicated Campaign Site (www.gov.ie/RBMP), and will also be used to facilitate communications and stakeholder engagement on issues regarding the RBMP and water quality.

Ultimately the role of the Programme Delivery Office will be to facilitate a more strategic approach to the communication efforts surrounding the RBMP, by having a very clear understanding of what communication opportunities exist and afford the opportunity to engage with the relevant stakeholders in a timely manner. The office will also act as a means for increased transparency and accountability regarding the delivery of the RBMP through the publication of regular progress reports, which will operate alongside the continuous review of the progress of the implementation of measures by WPAC, NCMC and the Regional Committees.

Governance measures to be undertaken in the third-cycle include:

- The roles and responsibilities of the various implementation bodies to be clarified, with the committees at all three tiers of governance shifting emphasis from the sharing of information and the provision of updates to a more focused provision of high-level policy direction, monitoring implementation of the Plan, and project management. This will also involve a review, and if necessary, the agreement of new terms of reference for the implementation bodies.
- An enhanced programme of formal and scheduled monitoring and reporting of progress in respect of the implementation of the RBMP will be put in place. This will be assisted with the implementation of the 46 Catchment Management Work Plans and supporting Sectoral Action Work Plans, as sub-plans to the national plan.
- There will be a continued emphasis on the full range of the regulatory mix, from awareness and education, through to norms and enforcement. As part of this, the balance in the third-cycle will be reviewed to ensure a greater emphasis on compliance assurance activity.
- There will be a specific capacity building programme of work put in place to encourage the transfer of learning and knowledge about how to make improvements locally, regionally or nationally.
- There will be a further activation, development and support of local level initiatives (rivers trusts, catchment partnerships).
- The Government has committed to a collaborative approach to the development of the third-cycle Plan and so the Department has discussed the findings of the research with key stakeholders. On publication of the IPA research findings, the research team, the EPA and the Department hosted two workshops: first with government bodies and the second with An Fóram Uisce. The objective of the workshops was to confirm with participants where improvements in governance arrangements are required and to identify ways forward.

Action 6.3: DHLGH will establish a Programme Delivery Office to oversee and co-ordinate the many relevant bodies that manage, implement, and enforce legislation and policies relevant to the Water Framework Directive. **[CABL #92 + AFU]**.

Action 6.4: DHLGH will review the roles and responsibilities of implementation bodies, shifting emphasis from the sharing of information and the provision of updates to a more focused provision of high-level policy direction, monitoring implementation of the Plan, and project management.

Action 6.5: An enhanced programme of formal and scheduled monitoring and reporting of progress in respect of the implementation of the RBMP will be put in place.

Action 6.6: National Oversight and Audit Commission (NOAC) will include appropriate water quality metrics in Key Performance Indicators for local authorities during the next review of indicators.

Action 6.7: Provide a continued emphasis on the full range of the regulatory mix, from awareness and education, through to norms and enforcement, with a review undertaken to ensure there is an appropriate balance in the third-cycle to ensure a greater emphasis on compliance assurance activity.

Action 6.8: Specific capacity building programmes of work to be put in place to encourage the transfer of learning and knowledge.

Action 6.9: Ensure further activation, development and support of local level initiatives (rivers trusts, catchment partnerships) in support of the delivery of the RBMP.

Action 6.10: The Water Forum to identify and advise the Water Policy Advisory Committee (WPAC) and Minister on the optimum level of engagement with the implementation bodies, agencies and structures for the WFD to support implementation of the third-cycle, in accordance with its functions under Article 26 of the 2017 Water Services Act (Number 29).

Public Participation

A key element of the Water Framework Directive, Article 14 requires member states to encourage the active involvement of all those with a connection to our water bodies in its implementation. Crucial to achieving many of the objectives of the WFD is the participation of all stakeholders, and particularly the public, in the development and implementation of River Basin Management Plans.

The second-cycle saw the formation of a new National Water Forum (An Fóram Uisce). This forum was established to facilitate better engagement with a wider range of stakeholders. The forum as a whole and many of the constituent members have been closely involved throughout the policy formation process. The forum has been providing commentary on the draft River Basin Management Plan and the programme of measures as these have been developed.

The third-cycle will include actions and measures to continue and encourage these enhanced opportunities for public participation. This will contribute to better water management. The principles followed for this cycle will build on the learned experience of previous cycles and on international best practice, including the OECD's Water Governance. The focus at both national, local and sectoral level will be on: communication, collaboration and capacity building.

The Department provides funding to build capacity to effectively participate in the water dialog process among stakeholders. This includes increasing funding to An Fóram Uisce, increasing funding to SWAN – the Sustainable Water Action Network and increasing funding to the Community Water Development Fund.

Many stakeholder groups, communities and individuals are already actively engaged in the river basin management planning process in Ireland, to help improve our water environment. This involvement will continue and will be increased during the third-cycle and in the preparation of future river basin management plans. This view was shared across a number of responses to the Significant Water Management Issues consultation. Many recognised that good work is already under way and that good arrangements are in place. However, a common theme running through the majority of the responses was the need to further improve communications and education programmes and to ensure that the right message is getting to the right people, particularly at the community level.

An Fóram Uisce and the Local Authority Waters Programme (LAWPRO), two initiatives put in place to address the concerns raised in the first-cycle plans, continue to facilitate stakeholder engagement in the development of national policies and to also ensure engagement on implementation at a regional and local level. However, it is clear that there is still an appetite among the general public for more consistent and meaningful engagement with the river basin management planning process.

Prior to the publication of the third-cycle plan, DHLGH had already sought to improve our engagements with stakeholders by hosting a number of bilateral meetings with An Fóram Uisce, environmental NGOs and others during the plan making process. Such engagement was invaluable in helping to explore how public participation in the river basin management planning process will expand during the third-cycle.

Central to the success of the River Basin Management Plan will be the reporting of its progress. The delivery of the third-cycle River Basin Management Plan will be reported on through a dedicated Campaign Site (www.gov.ie/RBMP) which will be managed by the Programme Delivery Office run through the Department. This will be a dedicated single web portal to direct people to information on water quality and the relevant agencies that will be working to implement the plan's objectives, and will work alongside other existing sources of information such as Catchments.ie and the LAWPRO website (lawaters.ie). The Campaign Site will also

act as a communications portal by providing regular updates on issues regarding water quality and public engagement events around the country, leading to the publication of quarterly updates on high level measures. The Campaign Site will assist in increasing public awareness around water quality issues and be a central point of information on the progress of the implementation of the plan.

Funding has been provided to LAWPRO to support the Irish River Trust's Resilience Pilot Project. A three year project, the funding is assisting the establishment phase for two Irish Rivers Trusts (Inishowen and Maigue) to enable them to become self-sufficient. The pilot offers the possibility of supporting community-based groups working actively on the ground across the country to form the backbone of continuing water quality actors into the longer term. This pilot project will evaluate the potential future role of the River Trusts as a model for public participation. In this way, it will inform future community engagement initiatives.

Although national measures are integral to the success of the Plan, the identification and implementation of "the right measure, in the right place" is a key driver in shaping the way we protect our water bodies. To achieve this we need the help of communities. During the third-cycle we will examine ways in which we can further support the formation and capacity building of local forums in the Catchment Management Work Plans to help identify and implement the right measures.

LAWPRO will undertake a scoping exercise and coordinated a series of workshops in early 2024 to examine the proposed membership of the Catchment Community Forum, its role and objectives, how it will operate and what funding supports will be needed. The scoping exercise will allow for the examination of the potential synergies and possible dependencies on existing structures and proposed new ones, such as the PPNs, County Biodiversity Fora, and Climate Fora, to be examined in detail so that there is no duplication of effort. It will harness the experience, views, and differences in the community landscape in five catchments across Ireland.

The workshops will be held in early 2024 and will provide learnings and recommendations for the development of a framework for the rollout of a pilot fora method.

As part of the effectiveness and efficiency review of LAWPRO (see next section - Continued Monitoring, Evaluation and Review), consideration will be given to the resources required to fully support and strengthen their community engagement activities as part of the wider process of increasing the role and resources provided to LAWPRO.

A commitment in the Programme for Government, the Community Water Development Fund, which is managed by LAWPRO, and oversubscribed with applications, will be expanded. The Fund will be further developed and expanded during the third-cycle in recognition of the benefit of increased participation of the public in helping to implement the RBMP. The assessment undertaken by the ESRI of the impact of the Fund will help to inform the future shape of the Fund. It is recognised that initiatives to influence behavioural change are most effective at local community level and the research conducted by the ESRI showed that there is clear evidence that CWDF funding is associated with better public engagement on water management issues. The DHLGH will continue to review the operation and effectiveness of the current programme to identify learnings from the second-cycle and progress areas for improvement over the life span of the third-cycle.

Action 6.11: Building on the excellent work already undertaken by the EPA, LAWPRO and various other bodies, DHLGH will provide further supports for the development of a National Water focused Citizen Science Strategy for the monitoring of water quality.

This will involve the rollout of the national macroinvertebrate citizen science process developed in the second-cycle and development and production of training and citizen science support materials, both of which will be led by LAWPRO. By engaging and involving the public in these science initiatives will provide increased knowledge and understanding about water quality in local communities.

Action 6.12: LAWPRO to evaluate the outcome of the Resilience Project for Rivers Trusts to inform future community engagement initiatives, including on citizen science.

Action 6.13: LAWPRO to examine ways in which further support can be provided for the formation and capacity building of local forums to help identify and implement measures.

Action 6.14: LAWPRO and DHLGH to review the operation of the Community Water Development Fund with a view to strengthening it. [CABL 99.]

The State must increase support for community groups and NGOs that are working on key projects to improve freshwater systems – e.g. support for Irish Rivers Trusts, group water schemes, angling and community groups.]

Action 6.15: LAWPRO will facilitate public participation in the development of the Catchment Management Work Plans through workshops for the 5 pilot catchments. This will inform the development and implementation of a national approach to public participation to deliver outcomes for water, climate and nature.

As part of this initiative LAWPRO will work with public bodies with responsibility for water related environmental enforcement to improve public awareness of public body responsibilities and reporting procedures for pollution incidents.

Action 6.16: The public participation pilots will provide learnings (which will then be implemented) on how agencies, local authorities, communities and landowners can work together to support action planning and project co-creation for a combined top-down bottom-up approach to the development and implementation of the 46 Catchment Management Work Plans.

Continued Monitoring, Evaluation and Review

As part of the ongoing monitoring, evaluation and review of measures contained in the second-cycle Plan, the following review processes have been initiated to learn from implementation and to identify ways to strengthen the current implementation structures. These processes will be continued into the third-cycle.

ESRI Joint Research Programme on Water

Funded by the Department of Housing, Local Government and Heritage, the Economic and Social Research Institute (ESRI) was engaged to undertake a joint research programme on water. With a focus on behavioural and attitudinal change towards Ireland's water resources, the aim of the research programme is to support implementation of the WFD and associated activities.

Governed by a steering group that is made up of representatives from various implementation bodies, the programme commenced work in May 2020. Conducted as a research programme, as opposed to a research project, this research involves a series of projects on a related theme carried out over a period of time. To date the research team has progressed work on the following topics;

- An evaluation of public initiatives to change behaviours that affect water quality: Evaluation of LAWPRO community engagements – This project looked to understand whether community engagement activities lead to more sustainable practices.
- Knowledge and Attitudes of Public Authorities towards Water Quality – This project considered the dissemination of good practice within Local Authority public services by the WFD implementation structures.
- Agricultural Sustainability Support and Advice Programme (ASSAP): An evaluation of the impact of tailored farm advisory service
- Community Water Development Initiatives – an assessment of impact
- Identifying behavioural/attitudinal issues related to water quality among farmers
- Impact of environmental subsidies on farming practices
- Farm Discussion Groups – a framework for behavioural change
- Identifying behavioural/attitudinal issues related to domestic wastewater treatment systems and the applications for grants

Review of the Local Authority Waters Programme and Wider Local Authority Structures

As mentioned previously, the Local Authority Waters Programme (LAWPRO) has a vital role in the implementation of the WFD in Ireland. In preparation for the third-cycle Plan, the Minister for Housing, Local Government and Heritage initiated a review of the LAWPRO operation to consider its effectiveness in delivering on its objectives and to identify opportunities for improving its operation during the next Plan, taking into account the wider policy development in relation to the water environment and the role of local government.

Carried out by Dr. Matt Crowe, former director in the EPA, the review concluded that LAWPRO was a successful initiative and should be continued. Effective in catchment assessments and collaboration with implementing bodies, LAWPRO also effectively supports communities to engage with their local water bodies and participating in the WFD process. The key conclusions and recommendations from this review, including a further efficiency and effectiveness review of LAWPRO's resources and structures, is currently being progressed in preparation for the third plan.

It was also recognised that LAWPRO and indeed the wider environmental function within local authorities needed to evolve to a more strategic leadership and coordination role – helping all local authorities and local communities do a better job at protecting and improving water quality. On this basis, and following

engagement with the County and City Management Association (CCMA), a review of the wider local authority structures is now under way to inform this evolution and identify the appropriate level of resources and involvement required from the sector to meet WFD objectives.

Action 6.17: A review of the wider local authority structures will be progressed to inform future needs in the water area and to identify the appropriate level of resources and involvement required from the sector to meet WFD objectives.

IPA Governance Research

Commissioned by the Environmental Protection Agency, the Institute of Public Administration (IPA) was engaged in a two-year research programme to review Ireland's water governance arrangements. The aim of this research is to inform preparations for the third-cycle Plan and also to share lessons learned from water governance with other policy areas.

Published by the EPA, a number of substantive papers have been developed by the research team. Acknowledging the significant progress made under the second-cycle Plan, the research makes a series of recommendations to support those involved, both in consolidating aspects of governance where there has been strong progress and in addressing areas of limited progress.

Review of the Agricultural Sustainability Support and Advisory Programme (ASSAP)

The Agricultural Sustainability Support and Advisory Programme (ASSAP) was introduced as part of the suite of measures in the second-cycle plan. This was a key measure and represented a move away from a largely regulatory-based 'one size fits all' approach towards one that also includes significant collaboration.

Through state and industry collaboration, the programme provides an evidence-based approach to pressure identification and farmer-focussed advice in the 190 priority areas for action (PAA's). Funding from DAFM and DHLGH has enabled Teagasc to provide 20 advisors and funding from the Dairy Processing Co-ops have provided 10 advisors as part of the Dairy Sustainability Initiative (DSI).

Launched in 2018, this new and innovative approach to improving water quality required the establishment of new methodologies, structures and systems to implement the programme. In many cases these were newly conceived and required time to develop. Some unforeseen obstacles, including the COVID pandemic, have impacted on the level of farm visits undertaken by the programme. However, as seen from their interim report [https://www.teagasc.ie/publications/2020/assap-interim-report-1.php], strong collaborative relationships have been established between the ASSAP advisors, Teagasc, the dairy processing co-ops and LAWPRO, with a substantial amount of progress being made.

However, with a commitment in the Programme for Government to expand this programme, to build on the work to date, clarity is needed on the future role and scope of ASSAP. As a result, an assessment of the programme was carried out by a panel of external experts and concluded in Q4 2021.

The External Expert Assessment of the Agricultural Sustainability Support and Advisory Programme (ASSAP) was completed in Q4 2021. The review concluded that "*ASSAP has a key role in improving water quality in Irish agriculture. The variety of farm conditions and the complexity of water movement means that 'one size fits all' policies, with general recommendations and rules, may struggle to be effective. The need for contextualised action is captured in the principle: the 'right action in the right place'. This requires engagement with farmers and others. This is part of an emerging system of experimental governance in the management of water and agriculture. ASSAP should be further developed under the 3rd RBMP, expanding as additional Areas for Action are selected, with appropriate scientific support.*" The Expert Group made 10 recommendations, namely;

1.	Develop and expand ASSAP: ASSAP should be further developed under the 3rd RBMP, expanding as additional PAAs are selected, with appropriate scientific support. Communications expertise should be engaged to consider naming, branding and promotional issues.
2.	ASSAP should continue to focus primarily on water quality in the PAAs: Its objectives should be simplified to focus more on supporting farmers' implementation of the right actions in the right place and demonstration of their impact on water quality.
3.	Funding to support farmers' implementation of Actions: Financial support, external to the ASSAP, needs to be available to enable farmers implement agreed actions recommended by ASSAP advisors.

4.	Enhance the mainstream advisory services: The further development of ASSAP needs be accompanied by an accelerated enhancement and refocusing of the mainstream advisory services (both public and private) with a stronger focus on sustainability (economic, social and environmental) and on-farm and action-based engagement.
5.	Continuous diagnostic review: the diagnostic flow-chart, designed jointly by ASSAP and LAWPRO staff, should be adopted formally as a tool for short-cycle assessment, review of progress in a PAA and identification of necessary network partners.
6.	Spatial recording of recommendations and actions: ASSAP, supported by its partner organisations, should complete the move towards spatial recording of recommendations and actions taken.
7.	Safe spaces to enhance transparency of the right actions in the right place and their impact: Use selected water bodies as a safe space to explore and refine demonstration of the right actions in the right place and their impact on water quality.
8.	Catchment-scale engagement, capacity building and planning: work to enhance the strength and capacity of catchment-level networks, so that catchment protection and management becomes embedded.
9.	Funding of ASSAP: maintain the balance of funding from government and industry as ASSAP expands, keeping the relative contribution of each under review.
10.	Demonstrating impact, informing policy and research: ASSAP should work with partner organisations to inform policy learning and research projects that are appropriate to experimental governance, linking iterative monitoring and review to higher-order long-term validation of the cumulative results of the overall approach to water governance.

These recommendations are being implemented during the third-cycle. The ASSAP has been extended for the third-cycle and the required additional resources to support the expanded Areas for Action are being examined. A national scale European Innovation Partnership (EIP) project, the Water EIP, has been commissioned to support farmers' implementation of actions. A budget of €60 million has been committed for the third-cycle.

Further details regarding the proposed measures that have been influenced by the outcomes and recommendations of these reviews are detailed in Appendix 1 - Programme of Measures.

Action 6.18: The Research Programme on Water will be continued into the third-cycle with an emphasis on studies on water governance, economics and behavioural aspects of water protection.

Action 6.19: Review to be undertaken of the Local Authority Waters Programme to identify necessary resources for the third-cycle and beyond to deliver the commitments under the WFD and future RBMPs.

Separately, a review of the wider Local Authority Structures is underway led by the CCMA. This is to inform the continuing evolution of local authority structures in catchment management and to identify the appropriate level of resources and involvement required from the sector to meet WFD objectives.

Action 6.20: Review the outcomes of the IPA Governance Research programme on Ireland's water governance arrangements and implement their recommendations where appropriate.

Action 6.21: Implement the recommendations of the External Expert assessment of the Agricultural Sustainability Support and Advisory Programme (ASSAP) during the third-cycle.

The new Water EIP will provide an important mechanism for implementing many of these recommendations.

Other plans and programmes

In addition to the existing policies and plans in the water sector, such as the Water Services Policy Statement (2024-2030) and Uisce Éireann's Water Services Strategic Plan that are to be reviewed, an important part of developing the RBMP has been to identify and understand the links to other policy areas across government, and the key plans and programmes either currently in place or planned. This has been informed by the Strategic Environmental Assessment (SEA) process, which details the plans and programmes that interact with and influence the river basin management planning process. The relevant policy areas include, land use and spatial planning, climate change, flooding protection, water services policy, waste management, agriculture, fisheries, forestry and peatlands.

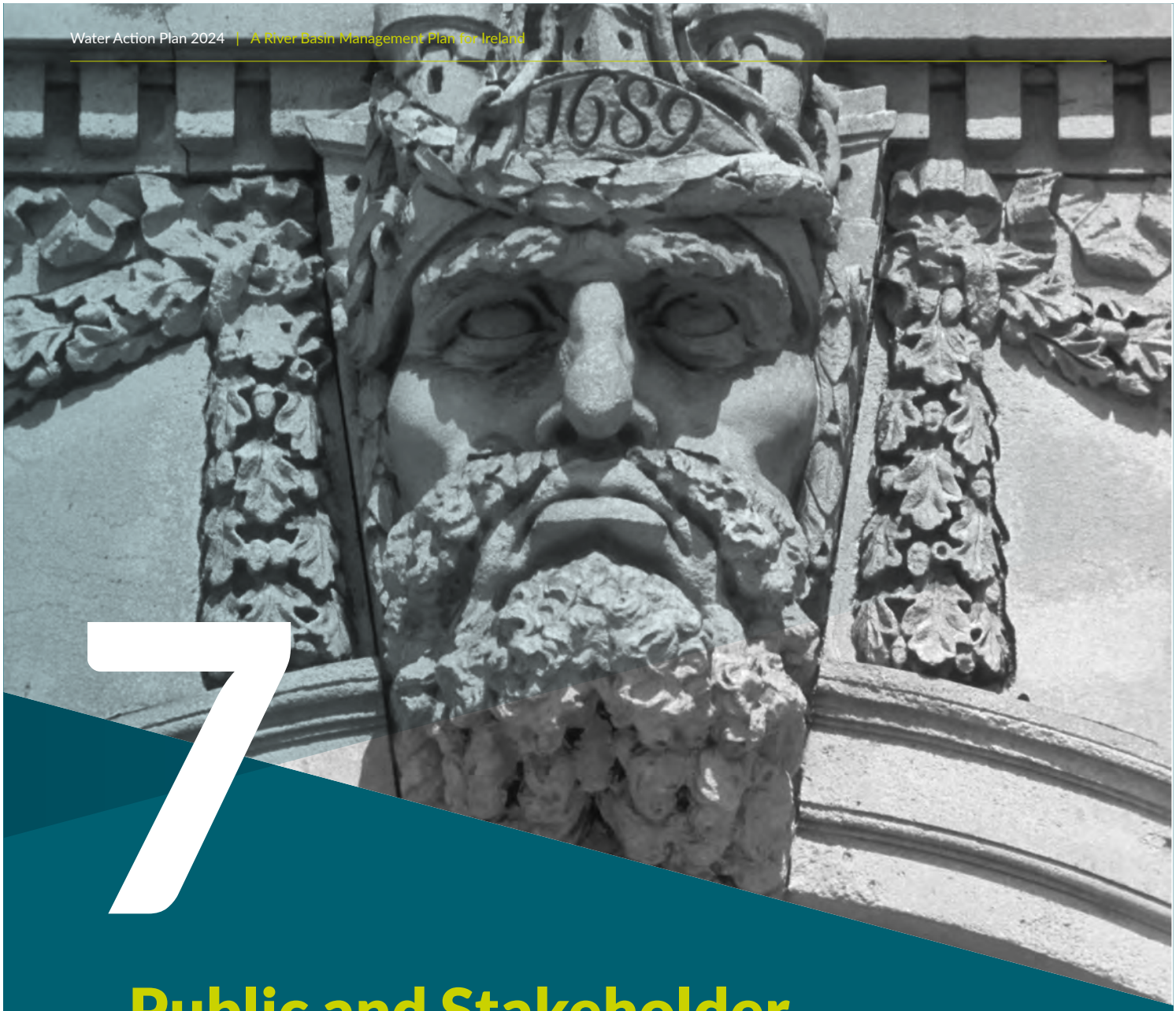
Ensuring consistent policy integration between the RBMP process and other national and local plans is an ongoing issue and is one, which has been identified by external stakeholders as a priority. Forging consistent and robust linkages between different

policy areas is a continuing challenge, whether it is in an environmental, economic or social context. This is a challenge that we are addressing in the third-cycle Plan. This involves linking the third-cycle plan objectives with the Climate Adaptation Plans, Marine Spatial Planning, Flood Risk Management Plans, Biodiversity Action Plans objectives and also seeking to have WFD objectives included in future plans as they are developed. It also includes links to agricultural policy, spatial planning policy, etc. In this way it will help us to gain multiple benefits from the measures implemented under all inter-related policy areas.

Action 6.22: Water protection provisions in relevant sectoral policies will be strengthened, where necessary. These include; water services policy, spatial planning policy, agricultural policy and aquaculture policy.

A number of sectoral policies are being reviewed to more closely align with and support the objectives of the National River Basin Management Plan.

Action 6.23: Measures that will deliver multiple policy objectives (e.g. water, biodiversity and climate adaptation/mitigation) will be identified and embedded into sectoral policies.



7

Public and Stakeholder Engagement

Consultation Responses

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

The public consultation process in relation to the draft River Basin Management Plan 2022-2027 commenced upon its publication in September 2021. Building upon earlier consultation phases the purpose of this consultation processes was to gather the views of the public and stakeholders to outline what should be addressed in the final River Basin Management Plan. This process involved two distinct elements with local public consultation undertaken by LAWPRO, and a national public consultation campaign launched by the Department of Housing, Local Government and Heritage.

Local Engagement by LAWPRO

Context

The Local Authority Waters Programme (LAWPRO) delivered local level public consultation on the draft RBMP to support the national public consultation process. The main objectives were to raise awareness of the draft RBMP and water policy implementation structures, better understand the public's perceptions and experience relevant to water quality management, facilitate discussions on local water bodies, and encourage active involvement in the public consultation.

Covid-19 restrictions on public gatherings affected the opportunity to host in-person public meetings. In response, LAWPRO adopted online and digital technologies to provide public access to relevant information and opportunities for local communities to participate in the consultation process.

This approach increased public knowledge and understanding of river basin management planning in Ireland, leading to informed discussions at county and Municipal District level meetings. The LAWPRO process included accessible methods for public submissions on the draft RBMP. Local knowledge gathered in this way, together with expert knowledge, resulted in a broader understanding of local water quality issues. In parallel with the above public consultation process, LAWPRO engaged with relevant stakeholders and implementing bodies, including through the regional Water Framework governance committees to encourage deeper participation by all sectors and encourage informed submissions on the draft RBMP. This included support for Local Authority staff in their engagements with elected members.

Consultation Process

Online and digital methods

LAWPRO developed a Virtual Consultation Room (VCR) to exhibit key contents from the draft RBMP in bite-sized format using videos, maps, and information boards. The room also had links to the draft RBMP and a local submission survey form, which posed five questions. This facilitated 24-7 access to information and involvement in the consultation process, during the Covid-19 pandemic. The VCR went live on 28th October 2021 and remained live up to the close of the consultation period.

LAWPRO utilised video conferencing technologies to host online public meetings in every county. Evening meetings were facilitated by LAWPRO staff and promoted widely at local and national levels to raise awareness of local water quality issues and the opportunity to participate in the consultation process. Two different meeting formats were provided:

County level: 30 meetings in collaboration with the Public Participation Networks targeted both the Environmental and Community & Voluntary sectors. This resulted in well-informed discussions on local water quality issues and potential solutions. LAWPRO staff documented the meeting discussions to ensure issues discussed were brought forward for consideration in the consultation process.

Municipal District level: 63 public meetings at a local level were delivered by LAWPRO, supported by Local Authority staff and Elected Members. These meetings focussed on Municipal District boundaries to mobilise local communities in their local areas. This approach facilitated local involvement in a national consultation process.

Media and digital marketing

LAWPRO ran a media campaign across local and regional press and radio to circulate water quality information and promote the local public meetings. Emails and phone calls to elected representatives, local stakeholders, and community groups strengthened that approach. Messaging was informed by science and evidence in the draft RBMP. For example, county and MD scale maps showing water bodies '*At Risk*' were used to make national messaging relevant and meaningful to local communities. This included the presentation of significant pressures and the water bodies "at risk" maps at county level geographic scales for each (half page) local newspaper advertisement, so as to increase the reach of basic water quality relevant information to as wide an audience as possible.

Two separate social media campaigns were delivered: one to promote the VCR, and one to promote the local public meetings. This involved a combination of LAWPRO generated content and 'paid for' promoted content. Both campaigns achieved objectives for raising awareness of the consultation process and specific ways through which people could get involved. Analytics and insights from the campaigns show that LAWPRO reached a wide and varied audience across all counties.

A dedicated page on LAWPRO's website provided a schedule of online public meetings in all counties, with links to registration pages. It also provided a link to the VCR and a draft RBMP consultation submission form designed to facilitate submission with a local context, the draft RBMP itself and the associated submission form on gov.ie. Thus, ensuring multiple ways for public participation in the consultation process. The draft RBMP consultation submission form contained a list of questions to generate a profile of those who engaged with the process and their relationship with water. It included questions canvassing the public's views on local water quality issues, requirements to restore local water quality and experience making environmental complaints.

Local Consultation Findings and Outcomes

Engagement and reach

LAWPRO's ambition was to increase awareness of the draft RBMP and engagement in the consultation process. It achieved this, as evidenced by the social media campaigns generating a reach of over 1,130,000 social media accounts and 60,000 link clicks to the VCR and meeting registration pages. A specific aim was to reach new audiences and a younger age demographic. Data from the social media campaigns show significant reach in age brackets between 18–44 for both male and female account holders. The age demographic for those who completed the online submission/survey form matches the profile for the general population in Ireland, indicative of a representative sample.

Action 7.1: Create opportunities for young people to engage, upskill and use their voice for sustainable development, through youth-led and youth-focused groups, organisations and networks.

Attendances and submissions

LAWPRO successfully achieved its objective to engage local communities in the public consultation process. This is evidenced by 6,100 unique attendees in the VCR, 1,594 attendees at public meetings, and 450 local submissions, during a time of Covid-19 restrictions. Both the county level meetings organised with the PPNs and the Municipal District meetings had good attendances, providing for a broad spectrum of public participation and locally focused feedback at different scales. In addition, Community Water Officers commented that in almost all cases there were good numbers of attendees at meetings not previously known to them. When compared to the consultation process for the second-cycle RBMP, LAWPRO considers that there is now greater knowledge and understanding of water quality issues and policy objectives at a local level, as evident in the comments gathered at public meetings and feedback via local submissions. Some regional variation was noted with the public feedback, which may reflect to some degree increasing concerns regarding declining water quality trends across the country, especially the southeast.

Figure 31: Local Consultation interaction

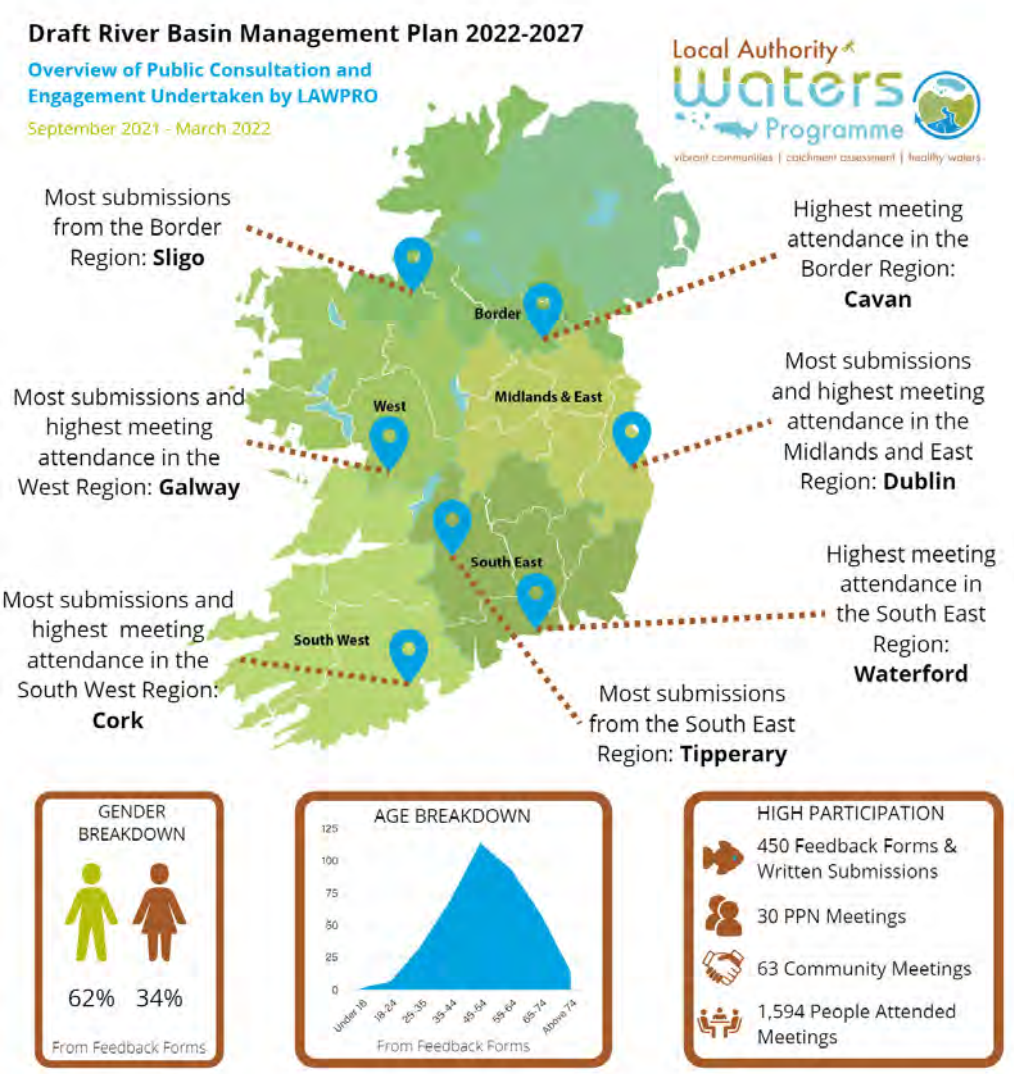


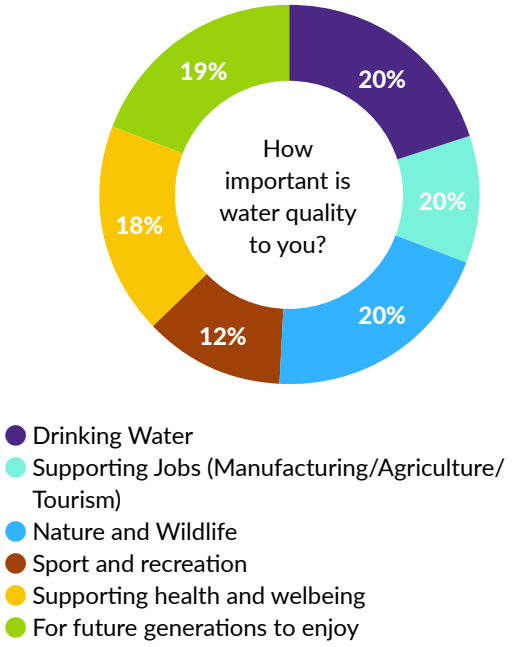
Figure 32: Social and digital media analytics

Icons	Channel	Stats	Rationale
	Local Press	64 Press Releases 41 Meeting adverts	Total Readership 1,851,676 people
	Local/regional radio	21 sets of radio adverts	Total audience 3,286,000
	Facebook and Instagram	Reach 79,141 Total clicks 14,264	Promotion of VCR and link to portal
	Facebook and Instagram	Reach 1,051,638 Total clicks 45,507	Promotion of local meeting and link ot registration page
	Virtual Consultation Room	6,100 unique visits	Public consultation and engagement during Covid-19 restrictions
	Online submission/survey form	450 local submissions	Ensure local input into decision making process

Public opinion on the importance of good water quality

The LAWPRO local consultation submission survey provided an opportunity to examine public opinion on the importance of good water quality (see Figure 33). The public place considerable weight on the importance on clean water to provide a range of services from drinking water, nature, health, the economy, jobs, and sport with recognition that clean water is important for future generations. Interestingly no one area dominates, showing that the public appreciate that water effectively touches on all aspects of our lives. This is consistent with the findings of the public consultation during the draft RBMP (2018-2021) where the public identified with clean water from a wide range of perspectives. Respondents to a poll during the "Stories from the Waterside" story writing initiative developed to engage with the public during the first Covid 19 lockdown in 2020 agreed that water quality was important to them (96%), with 50% stating that they would be interested in getting involved in local projects, 25% stating that they would be interested in getting involved in citizen science and 25% interested in public consultations on water management.

Figure 33: Important aspects of water quality per respondents



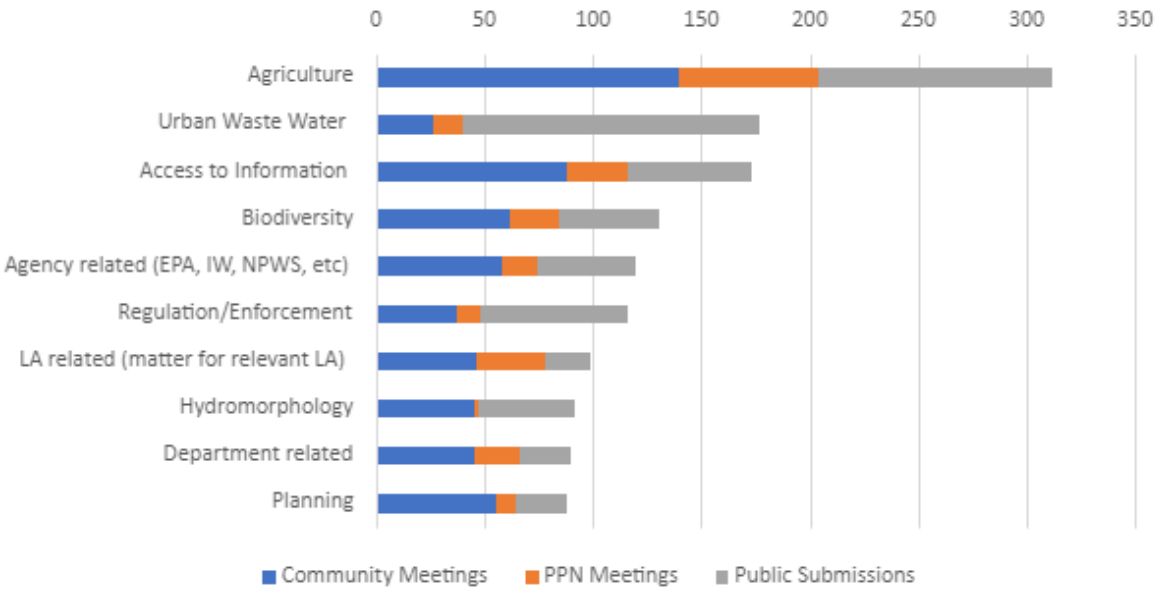
Themes arising from public feedback

Public participants in the consultation process via the LAWPRO local submission form shared knowledge of issues pertaining to local water bodies. LAWPRO also compiled the comments gathered at the 93 public meetings. A list of the key themes emerged from recurring issues and concerns raised by local communities. These themes are presented in Table 15, with the top ten themes presented in Figure 34, which also shows their relative frequency of occurrence at the different consultation method.

Table 15: Themes from public feedback

Access to Waters	Climate Change	Forestry	Industry	Recreation
Access to Information	Consultation Process	Funding	Invasive Alien Species	Riparian Zones
Agency Related	Department Related	Flooding	Local Authority Related	Regulation and Enforcement
Agriculture	Domestic and Urban Wastewater	Heritage	Mines and Quarries	Water Quality
Biodiversity	Dumping and Litter	Hydromorphology	Peat	Urban Surface Water Run-off

Figure 34: Analysis of themes by consultation method



Understanding the public's views on protecting water quality

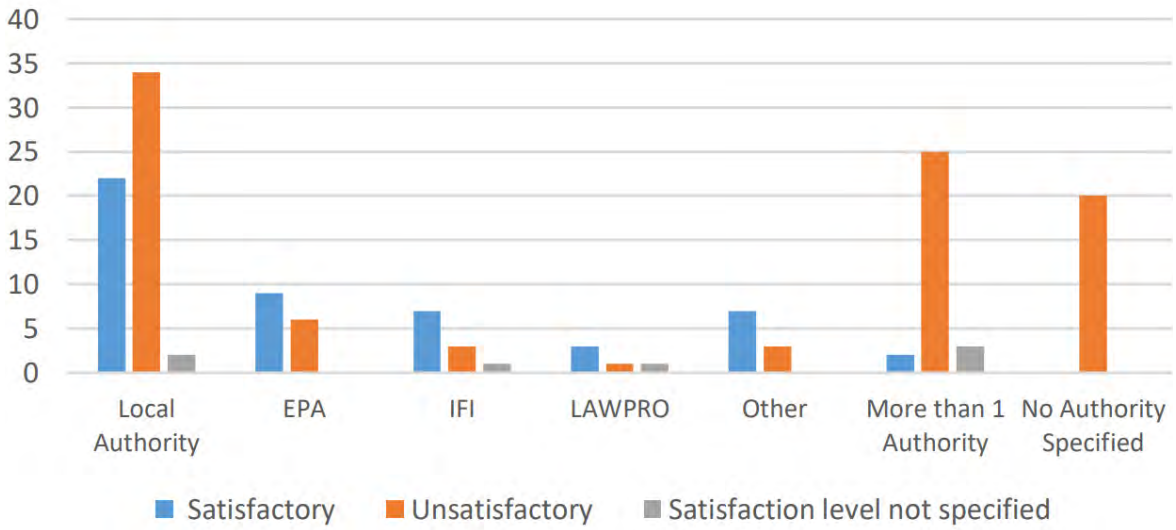
The LAWPRO local consultation submission survey provided an opportunity to examine the public's views on risk to water quality and their views and experience engaging in water quality protection in a semi-quantitative fashion.

Respondents were asked to rank six different water-related initiatives and actions, 'Protecting water quality as part of agricultural and land management activities' was ranked the most important. In addition, respondents had the choice of five options for protecting and restoring good water quality. Most respondents chose 'Greater enforcement of regulations (Prosecuting or penalising water polluters)' as the most important. Overall, respondents identified their main interests in water quality as: preventing pollution, preventing flooding, and climate change activism.

Public body procedures relating to the reporting of pollution incidents by the public have been an issue consistently raised to LAWPRO by members of the public with an interest in water quality. This relates to both the making of complaints and follow up action. The draft consultation presented an ideal opportunity to get a better understanding of the issues (below are the results from 415 participants who addressed this question)

1. 61% of those surveyed stated they knew who to contact if they spot a pollution incident in their local waters, 38.6% did not know.
2. 34% of participants who had reported a pollution incident to a public body (n=149) indicated a satisfactory experience while 62% indicated an unsatisfactory experience. The satisfaction rate ranged significantly between (and across) local authorities, the EPA and Inland Fisheries Ireland.
3. 33% of participants who had reported a pollution incident, identified more than one public body or did not specify a public body. The dissatisfaction rate among these cohorts was very high at 83% and 100%, respectively.
4. 53% of respondents did not know where to go to find out information about their local water quality.

Figure 35: Survey participants experience of incident handling



The overall findings suggests that public bodies need to work together to tease out difficulties to improve public stakeholder satisfaction.

Summary findings from the consultation undertaken by LAWPRO

Water Quality

1. Participants demonstrated a good understanding of the key pressures impacting on water quality. This included a good understanding of pollutants, pollution pathways and the general complexity of our water quality problems.
2. Participants see strong links between landscape features such as buffers, hedges and wetlands and water quality protection. This includes the recognition that continuing pressures from agriculture and development threaten such landscape features and therefore water quality.
3. Participants see the benefits of landscape features to mitigate against the loss of nutrients and farm chemicals in agricultural runoff. However, concerns were expressed regarding unregulated land use changes.
4. These natural landscape features are also appreciated for their value in supporting biodiversity and climate mitigation and adaptation.
5. The challenge of both improving water quality and halting further decline, featured strongly. Many participants expressed a lack of confidence in current public body efforts to protect water quality.

Governance

1. Participants commented on the lack of clarity between the roles of the implementing bodies.
2. It was generally recognised that both enforcement and education are required to effect change. Feedback indicate that the public perceive that neither enforcement nor education is being implemented effectively.
3. Implementation and enforcement issues link closely with the theme of public body responsibility. Interestingly this theme scored highest in the responses to the question 'what will help restore local water quality?'.
4. Effective enforcement and better compliance are seen as part of the solution to water quality featuring high on the list of 'what will help restore local water quality?'.

Water Literacy and Communications

1. Cross sectoral education, the promotion of the value of water and the need for a multi-agency approach all feature as part of the solution to current problems.
2. Elements of water literacy feature strongly in response to 'what will help restore local water quality?" Participant views are not just about education and awareness but go deeper and identify the need to tap into the public's value system.
3. Information about local waters, in 'plain English' appears to be lacking from a community perspective. Many practical suggestions were made to address this issue. Participants indicated that such information would be beneficial and promote more local 'ownership' and support community empowerment.
4. Better information, education and communication may also improve relationships

at the local level and contribute to water literacy across all sectors.

Community input

1. Community reporting was another popular and interesting idea. This related to both citizen science and being able to report incidents or concerns. A common thread was that participants could see a more useful reporting role for the community, if they understood local data and reporting arrangements.
2. There was evidence that there was a lack of trust between community and public bodies, and such relationships do not appear to be working well.
3. Participants had detailed knowledge of many local problem areas and pressures, but in many of the instances described, they were unhappy with public body responses and follow up actions (if any).
4. Evidence of problems from wastewater sources were presented. Enforcement and investment needs were identified.
5. Of note was the frequency of comment on problem septic tanks and small sewage systems. Poor septic tank grant uptake and the many associated legacy issues were recognised.

Local Consultation Recommendations

The overall aim of this LAWPRO online portal submissions subset analysis is to delve into the detail of participant's responses and obtain learnings, that can be brought forward for planning the third-cycle of the RBMP.

Better Governance

1. There is a need for implementing bodies to have clear roles and responsibilities. They should be more accountable and their work more transparent to the general public.
2. The issue of a lack of trust and a need to enhance relationships between the community and public bodies needs to be addressed. Local structures and processes need to be nurtured and opportunities within local democratic structures maximised.
3. In terms of measures in the third-cycle RBMP, better enforcement should be complimented with a campaign around the value of our waters and access to tailored local information. These can be considered interdependent rather than stand-alone measures.
4. Enforcement involving courts (up to criminal prosecution) is onerous and can be a blunt instrument when dealing with individuals.
5. In terms of households with problem septic tanks a 'BER' style septic tank rating model attached to house value and sale might incentivise investment in upgrade works. This would also highlight the importance of ensuring that a septic tank is fit for purpose to potential buyers and current owners.
6. Consideration needs to be given to the protection of existing water quality supporting landscape features and the enhancement of existing river corridors, vegetated buffers, hedges, and wetland features.

Enhanced Community Engagement and local initiatives

1. Good news stories and examples of collaboration at the local level need to be collated and disseminated.
2. Case studies should be undertaken where community groups have reached a blockage to progress in their area. For example, when dealing with legacy issues or determining what are the 'next steps' to action recommendations once relevant investigations or studies have already been undertaken. A trusted intermediary, appropriate expert or interdisciplinary team could be utilised to assist this process.
3. LAWPRO should seek to work with new local authority staff working in the climate, biodiversity, and community development areas. A collaborative approach to public engagement, promoting awareness and understanding, building group capacity and generally empowering groups should be examined.
4. Supporting environmental interest groups would make better use of local democracy structures. This could include examining ways to strengthen the environmental linkage groups to give a stronger voice at Strategic Policy Committees (SPC) and Local Community Development Committees (LCDC).

Water Literacy and Information needs

1. Information about local waters, in 'plain English' is lacking from a community perspective. Citizen Science programmes (combining water and biodiversity techniques) should be promoted to help provide practical understandable local information. This would promote local involvement and capacity building. Citizen Science can provide a first step to further water literacy learning and a pathway to more concrete actions to protect and restore water quality.
2. Better information, education and communications need to be developed to

contribute to water literacy improvements across all sectors.

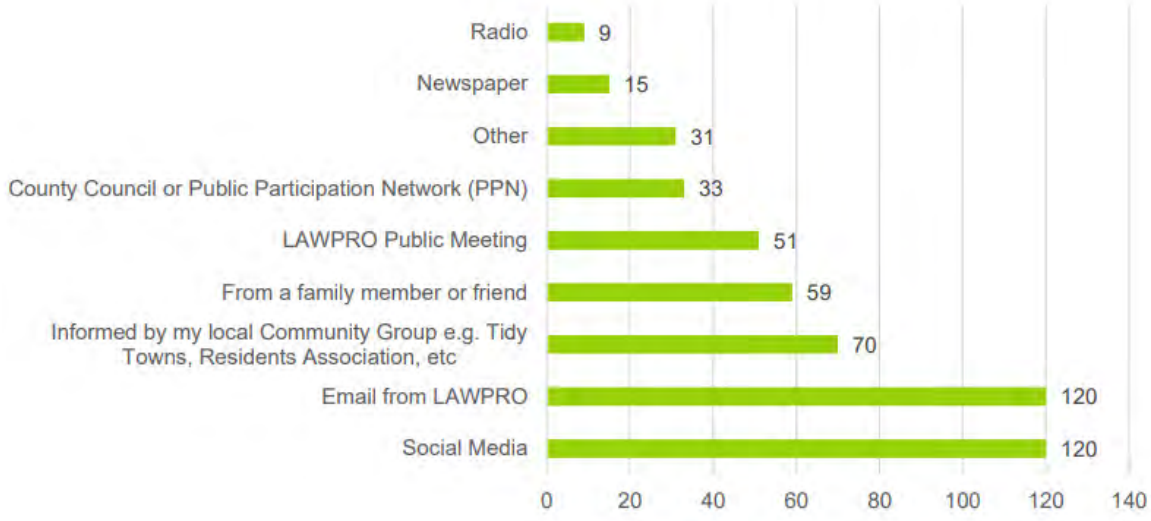
3. The River Basin Management Plan Regional Operational Committee members (implementing bodies) should play a stronger role in public information sharing and dissemination.
4. The proposed Catchment Stakeholder Fora agenda needs to incorporate community feedback. The findings and recommendations from this report require further deliberation at county and catchment scale.

The LAWPRO public consultation and local engagement reports on the draft RBMP is available online at the LAWPRO website www.lawaters.ie .

Figure 36: Overview of public consultation & engagement by LAWPRO



Figure 37: Breakdown of how respondents heard about public consultation



National Consultation Engagement

A six-month long national public consultation was undertaken in line with the requirements of the EU Water Framework Directive, inviting submissions, observations and comments on the draft RBMP.

The objective of the Department's media campaign was to encourage the public to participate in the public consultation on the draft River Basin Management Plan. While LAWPRO was engaging local groups and communities throughout the country, the aim of the Department's campaign was to generate awareness of the consultation at the national level, and more broadly on the importance of water to the nation, reflecting the Department's high ambitions to improve water quality.

Members of the public could participate in the consultation process between 27 September 2021 and 31 March 2022 through submission of a consultation in two ways: to LAWPRO, with their emphasis on engaging local communities in water issues, or directly to the Department. The campaign also sought to equal or better the number of consultations received compared to the previous consultation campaign run for the second-cycle RBMP in 2017, where approximately 1,000 submissions were made to LAWPRO and 600 directly to the Department. In total, 1,401 submissions were received into the Department with a further 450 received by LAWPRO.

Media and Digital Marketing

Advertisements were successfully run on the various websites and through social media sites such as Twitter, Facebook and Instagram to generate awareness of the public consultation campaign. Between 01 March 2022 and 27 March 2022 a total of almost 1.3 million impressions and 688 clicks were recorded as a result of the online campaign. On Twitter the department ran two animated videos, with the associated two tweets generating 250,100 impressions and 103,827 link clicks to the draft RBMP website.

Newspaper advertisements were also published in several mid-week and weekend publications including;

- Seachtain
- Sunday Business Post
- Sunday Independent
- Irish Independent
- Irish Examiner
- Irish Times

Details of Submissions

A total of 1,401 submissions were received by the DHLGH through either the on-online survey or by direct email, and were initially categorised as submissions based on the:

- Consultation Response Questionnaire issued by the DHLGH which contained 26 questions (161 submissions);
- Template response (original emanating from the Sustainable Water Network (SWAN), a network of environmental NGOs) (1,172 submissions); and
- Individual 'free style' responses (68 submissions) from the following interest groups;
  - » Government Department/Agency/Body;
  - » Local Authority;
  - » Non Governmental Organisations (NGOs);
  - » Community Groups;
  - » Companies/Corporate;
  - » Public; and
  - » Political Party.

259 out of these 1,401 submissions were identified as being unique. Submissions were reviewed, key themes identified and a consultation report compiled to inform amendments to the draft RBMP prior to its finalisation.

As the submissions were reviewed, a key themes list was developed to identify recurring issues and the scope of concerns raised by stakeholders. Thirty-eight themes were subsequently identified across the 259 submissions reviewed (see Table 16).

Table 16: Key Themes List

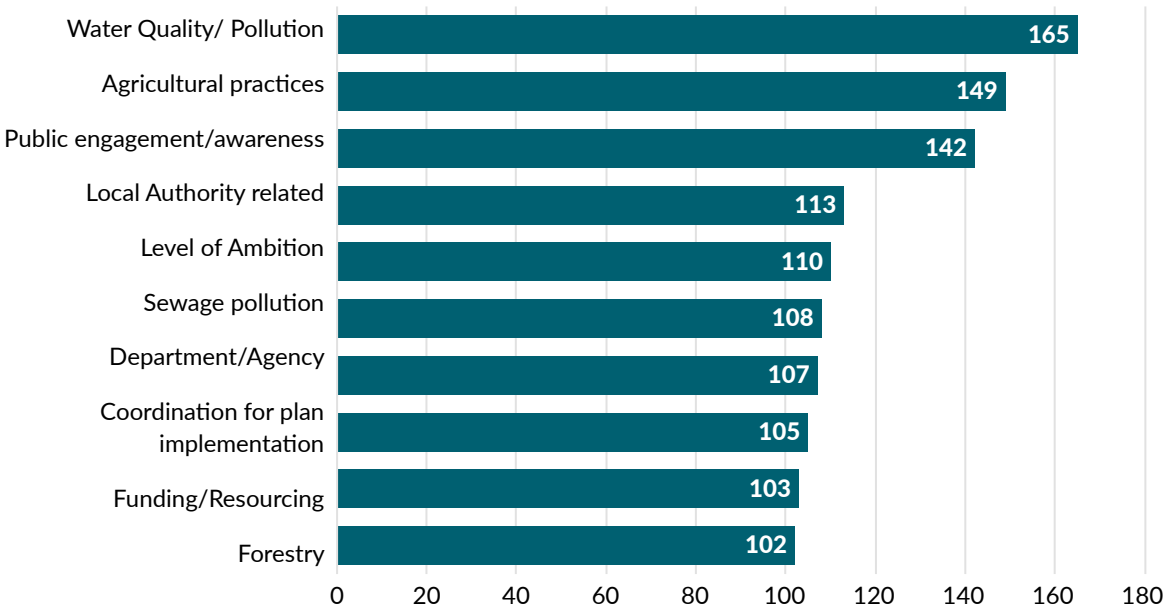
Water Quality/Pollution	Affordability and Prioritization
Biodiversity Management	Abstraction and Flow
Flooding	Climate
Forestry	Coordination of plan implementation
Hydromorphology	Education and/or training
Recreation	Hazardous chemical
Agricultural practices	Water and health
Invasive Alien Species	Public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

Significant Issues & Themes

Some of the significant issues raised within the ten most prominent key themes raised as part of the national public consultation processed are outlined in Figure 38.

- **Water Quality / Pollution** – some of the issues raised included the need for clear water governance and adequate investment, a lack of specific measures to improve water quality in the plan, inefficient liaison with water stakeholders, and transparency from authorities working in the water sector.
- **Agricultural Practices** – some of issues raised included the lack of recognition of the conflict between agriculture and WFD targets, the urgency related to nutrient pollution, the need for better incentives for farmers to promote good practices, and the need for stronger enforcement.
- **Public Engagement and Awareness** – some of the issues raised included the inadequate public participation measures in the draft plan, alongside the need for a comprehensive, transparent, and participative public engagement programme, and greater community involvement.
- **Local Authority** - issues highlighted in relation to the Local Authorities including lack of funding and adequate resourcing, and the availability of training to deliver necessary measures. The role of Local Authorities to sustain, drive, fund, and coordinate community involvement, along with the development and implementation of the proposed Catchment Management Work Plans were also raised.

Figure 38: Top Ten Themes Raised Across Consultation Submissions [based on 259 unique submissions sent to RPS]



- **Level of ambition** – issues highlighted was that the level of ambitions in the draft plan was considered inadequate, and that there is a need for measures to be more targeted, measurable, timebound and based on more Key Performance Indicators (KPIs).
- **Sewage Pollution** - issues raised included the difficult nature of the grant application process for domestic wastewater treatment system (DWWTS), while more investment and inspectors for proper inspection of all the malfunctioning DWWTS was noted. Other issues raised was the need for the Irish Water (*now Uisce Éireann*) Investment Plan to end sewage pollution from all the wastewater treatment plants identified as the main pollution source, and the urgent need for upgrade or replacement of specific WWTP.
- **Department / Agency** – needs identified included for every department/agency to carry out an internal review in respect of its role under the RBMP, that the RBMP must ensure that a joined-up approach is taken to the preservation of water quality and wastewater management, and that a single lead agency must be identified and resourced adequately to monitor and uphold key performance metrics for successful implementation of the plan.
- **Co-ordination** - highlighted was the need for greater coordination among the implementation bodies in particular Local Authorities and the Department of Agriculture, Food and the Marine (DAFM), better policy coherence between water, climate and biodiversity plans and measures, and clarity on the responsibilities of different stakeholders towards the improvement of water quality.
- **Funding** – highlighting the significant need for appropriate funding and resourcing to deliver necessary measures.
- **Forestry** – issues include the requirement for WFD specific assessment and site-specific conditions for all planting and felling licences in the forestry sector.

A copy of the report detailing the findings of the national consultation engagement is available online at https://www.gov.ie/en/publication/56b71-third-cycle-draft-river-basin-management-plan-2022-2027-consultation-report/

Findings and Analysis

Overall, submissions criticised the level of ambition with the plan and the slow progress to date, calling for measures to be more targeted, measurable and time bound. Feedback from this consultation highlighted a need for greater transparency, sharing of information and tracking of measures, with a requirement for a better implementation process and improved governance. Among other issues, respondents also called for greater coordination among the implementation bodies and for policy coherence between water, climate and biodiversity plans and measures.

Response

To address these concerns, DHLGH are seeking to strengthen the existing governance structures around the implementation of the plan's programme of measures, to provide a more robust monitoring and reporting system over the duration of the next plan. This will include the development and implementation of the Catchment Management Work Plans for the 46 catchments across Ireland, and a dedicated Programme Delivery Office which will oversee and report on the implementation and delivery of the programme of measures, and work to enhance co-ordination between the implementing bodies and stakeholders. Catchment Management Work Plans will be dynamic plans that will develop and evolve with increasing detail over the third-cycle. The engagement of all implementation bodies in this process, including clarifying their roles and responsibilities where required, will be key to the successful implementation of measures and providing the joined up thinking to deliver Water Framework Directive objectives and those for climate change and biodiversity. Further review of the success of the implementation of the programme of measures will be factored into the third-cycle of the RBMP, with increased public participation over time beginning with research into the establishment of Catchment Community Fora by LAWPRO, with the objective of co-designing a framework, which will scope different engagement methods for the proposed establishment of 46 Community Fora during the lifetime of the third-cycle. These Fora will build further on the capacity within communities to identify and implement measures, with the objective to produce a Community Action Plan.

Bilateral Consultations and Engagements

As a requirement of Article 14 of the Water Framework Directive (WFD), it is necessary to encourage the active involvement of all interested parties in the implementation of the WFD, in particular in relation to the production, review and updating of River Basin Management Plans. As part of the development of the River Basin Management Plan, DHLGH conducted numerous consultations and bilateral engagements with other agencies, departments and organisations to assist in the development of the Programme of Measures. The engagement process commenced with the Significant Water Management Issues (SWMI) consultation which influenced the development of the draft River Basin Management Plan.

The extent, depth and complexity of discussions on measures for inclusion in the third RBMP are significant. With this in mind a small team of representatives from the then DHPLG, the EPA and local authorities (drawn from LAWPRO), who represent the three lead authorities responsible for the preparation and implementation of the RBMP, was assembled. This Programme of Measures Development Team scheduled and engaged in bilateral discussions with key stakeholders on the issues identified through the SWMI consultation process. These bilateral engagements were an important step in the overall process, providing organisations with the opportunity to contribute to the development of new approaches to address the significant water management issues in Ireland, by enabling discussion on options around what should be done, and by whom, so that the best outcomes are achieved. As part of this bilateral process, and to seek feedback on the development of the programme of measures, the DHLGH has met with An Fóram Uisce over 16 times since 2020. The intention with this process was to reach agreement on proposals for where additional effort and resources will be directed during the third RBMP cycle, as the measures will play a key role in ensuring that progress towards achieving the environmental objectives by the 2027 deadline is maximised.



8

Economic Analysis of Water Use

Update and review of the Economic Analysis

This section sets out the approach in Ireland to the analysis and recovery of costs for water services and the contribution made by the various water users to the recovery of water services. Water resources need to be protected and used sustainably, if we are to maintain sufficient water resources for nature and for society.

The main challenges in the third-cycle for water services will be achieving quality and environmental compliance; incorporating population change (both population growth and urbanisation); supporting economic growth (especially in agriculture and water-using industries); and the additional pressures arising from climate change.

The most recent commentary from the Central Bank of Ireland[20] is that the outlook for domestic growth over the coming quarters is more challenging than previously expected, against a background of energy-driven inflation remaining prominent. While the labour market remains tight following the post-pandemic recovery, significantly higher consumer prices and business costs are creating a drag on household spending and business investment in the near term. Inflationary pressures are forecast to ease through 2024, allowing domestic growth to pick up again over the year. Inflation is expected to moderate to below 3 per cent over 2024, *albeit*, that fossil fuel prices may stay elevated over the medium term. However, the economic outlook remains highly uncertain, with the baseline forecast predicated on current market expectations for energy prices, which have been volatile.

Ireland's spatial development and planning policy is set out in Project Ireland 2040 {https://www.gov.ie/en/campaigns/09022006-project-ireland-2040/}. This is the framework for social, economic and cultural development of Ireland. The CSO has reported an overall increase in the population of 55,900 (1.1%) in the year to April 2020. This compares to an increase of 64,500 for the year to April 2019 and brings the population estimate to 4.98 million in April 2020. This is in line with the expectations of the Project Ireland 2040 strategy. The Plan is based on an anticipation that by 2040 there will be an additional one million people living in Ireland. There is a need for 500,000 new homes to accommodate this growth. Covid-19 has resulted in new trends in work and living demands. While it remains to be seen if these patterns endure, there is a Government commitment to develop a Town Centre First policy, to implement a strategic approach to town centre regeneration by reusing and refurbishing existing buildings and unused lands for new development to promote residential occupancy in our rural towns and villages.

Existing water uses, impacts and pressures

The preceding chapters of this plan have set out the identification of significant water management issues and pressures including water uses. Based on the data gathered by the abstractions register that was put in place in 2018, energy generation, drinking water supply, quarries / mining and industrial processing are the sectors abstracting the most water. The provision of public drinking water supply is the predominant abstraction risk within this cohort. Public water supply is the source of drinking water for roughly 80% of the population and also provides water for many of our larger services and industry. The Water Environment (Abstractions and Associated Impoundments) which was signed into law in late 2022 will put in place a new and enhanced authorisation regime for water abstractions.

Application of Article 9 (Recovery of Costs)

Ireland is required to ensure that there is an adequate contribution of the different water user from industry, households and agriculture, to the recovery of the costs of water services. The cost of providing water services and the current policy of recovering those costs has been subject of significant public discussion and debate. The policy in relation to the funding of water services in Ireland is now well developed.

The Commission for Regulation of Utilities (CRU), is the economic regulator for public water services (water and wastewater). Ireland modernised and updated its water charging regime. The CRU approved the introduction of Uisce Éireann's Connection Charging Policy that contains a national set of charges for connections to the Uisce Éireann water and wastewater networks. Non-domestic tariffs for the provision of water and wastewater services have also been standardised, reforming the myriad of local authority charges into one standardised national charging system. The introduction of domestic user excessive use charges for public water services is now approved (by the CRU, July 2019) and will be implemented once the legal framework, including matters relating to an application for, and confirming continued entitlement to, an exemption from excess use charges on medical grounds, is in place.

Domestic customers will be charged for water and/or wastewater services when the individual use of water puts the objectives of the Directive at risk. Ireland has legislation which sets out a reasonable use allowance for households each year. Following a period of time

20 Quarter 1, 2024 Economic Bulletin by the Central Bank of Ireland

to address leaks and/or reduce demand, anyone that uses water above this annual allowance will be charged for water and/or wastewater services. The allowance has been set at 1.7 times the average rate of water demand for Uisce Éireann's domestic customers. This rate was recommended by the CRU and provided in its advice to the Minister. This rate may be changed by the Minister following receipt of further reports from the CRU recommending an amended 'average rate'.

This policy ensures and encourages households to conserve water and, where possible, to identify and to fix leaks in the water supply at their property. Excess use charges, when implemented, will promote conservation and responsibility for water use. This is to help ensure that Ireland meets in full the requirements of the Water Framework Directive, and especially Article 9 of the Directive. The household water allowance is 213,000 litres per year for up to four occupants, rising for higher occupancy. Household usage up to this level will be funded by the public through general taxation. Households using more than their allowance will be charged for use over this allowance. There will be some additional allowances or exemptions for particular humanitarian and/or hardship cases (for example: medical card holders). Uisce Éireann will inform domestic customers if they are using water above the annual household allowance. The CRU and Uisce Éireann estimate that approximately 10% of customers will pay the excess charge. A notice will be issued by Uisce Éireann to customers who exceed their household allowance over a 12-month period.

Up to 1st April 2019, new connections to the Uisce Éireann water and wastewater networks were charged at the rates applied by the local authorities as at 31st December 2013. There were c. 57 different charging regimes with different methodologies and levels of service and, as a national utility, Uisce Éireann recognised that this situation was inconsistent, unfair and overly complex. The CRU also recognised the inconsistency and unfairness of the charging model and asked Uisce Éireann to submit a proposal for a new Connection Charging Policy which would be simple, fair, and transparent for customers across the country. The CRU published its decision on Uisce Éireann's proposals in December 2018 and the new Connection Charging Policy is live since 1st April 2019.

All business customers (or 'non-domestic' such as agriculture, energy, services and industrial consumers) of Uisce Éireann pay charges for water, wastewater and trade effluent services. This includes the non-domestic charging arrangements applied to the commercial portion of 'mixed use' customers who use water and wastewater services for both household and business purposes on the same supply (for example agricultural enterprises with private households). Prior to 1st October 2021, Uisce Éireann continued to charge business customers on the same basis as determined under relevant Government policy and applied by local authorities as of 31st December 2013. Non-domestic charges were previously determined and charged by 34 individual local authorities and 10 town councils. This resulted in a wide range of pricing levels, categories, methodologies, and billing arrangements. Following a review of the existing charges, and extensive publication consultation, the CRU approved the harmonisation of 500 separate charges into a single new Non-Domestic Tariff Framework. The new Framework came into effect from 1st October 2021. This established a single national approach to charging non-domestic customers for water and wastewater services provided by Uisce Éireann, which is benefitting business customers in terms of transparency, simplicity and equity. In December 2023, the CRU launched a public consultation on Uisce Éireann's proposals to update the existing Non-Domestic Tariff Framework for purposes of generating new non-domestic water and wastewater tariffs (to reflect updated revenue and customer input data) and also proposals to establish new harmonised national Trade Effluent Charging arrangements and importantly integrate these into the Non-Domestic Tariff Framework. The CRU's decision will be available in 2024.

The Programme for Government has committed to retaining Uisce Éireann in public ownership as a national, standalone, regulated utility. The Programme has also committed the Government to ensuring that Uisce Éireann is sufficiently funded to make the necessary investment in drinking water and wastewater infrastructure.

Uisce Éireann has also been tasked to develop plans to ensure security of supply and sufficient capacity in drinking and wastewater networks to allow for balanced regional development. Uisce Éireann funding is subject to a number of formal steps. The Minister prepares a Water Services Policy Statement[21]. This sets out Government water policy objectives and priorities. Uisce Éireann prepares a Water Services Strategic Plan[22] for a 25 year period. Uisce Éireann prepares a Strategic Funding Plan. This outlines implementation of the Water Services Policy Statement. The Minister decides to approve or not approve the Strategic Funding Plan. If not approved, Uisce Éireann must re-submit the Strategic Funding Plan. The CRU conducts its normal revenue control process and decides the level of revenue Uisce

21 Water Services Policy Statement - https://www.gov.ie/en/publication/49364-water-services-policy-statement-2018-2025/

22 Uisce Éireann's Water Services Strategic Plan - https://www.water.ie/projects/strategic-plans/water-services-strategic/

Éireann is allowed for the revenue control period. Uisce Éireann prepares a Water Charges Plan. This sets out the charges for water services and the costs that it expects to incur in delivering water services. The Department of Finance allocates the allowed funds to Uisce Éireann through the annual budgetary process.

While some actions may be subject to adjustment pending the outcome of the proposed development of an overall financing strategy, the following actions will be undertaken during the third-cycle RBMP.

Water Re-Use

EU Regulation 2020/741 on minimum requirements for water reuse encourages a circular approach to water reuse in agriculture. At the moment there are no municipal water reuse projects in Ireland. The reuse of treated urban wastewater for agricultural irrigation is a market-driven action, based on the demands and needs of the agricultural sector where there are water resource shortages. Water scarcity is not a strong driver for reuse in Ireland and the demand for irrigation water is relatively low in comparison to other parts of Europe. This is due to the agriculture type in Ireland and our temperate maritime climate. Ireland has abundant water resources due to our mild and wet climate and does not suffer from the same wide extremes of temperature as parts of the European mainland.

However, climate change is impacting on the weather in Ireland resulting in changing rainfall patterns with projected increased rainfall in autumn and winter and reduced spring and summer rainfall. This change will increase the pressure on water resources particularly in the summer period as experienced in 2018, in 2020 and most recently during July and August 2022. In the future, these factors may result in a greater interest and demand for the reuse of water in Ireland particularly during the summer period. The reuse of water will be facilitated if the pressures of the status of surface and groundwater increase to a point where the environmental and resource costs of using reclaimed water in the geographical and climate context of Ireland justifies pursuing these projects.

Production and supply of reclaimed water for agricultural irrigation will therefore only be permitted if a market demand for the reuse of water emerges during the six-year cycle of this River Basin Management Plan. This position will be reviewed prior to 2027 and reported in the next river basin management plans.

Econ 1: The DHLGH to undertake an evaluation including a stakeholder consultation of the appropriateness of water reuse for agricultural purposes within Ireland and report findings in the next River Basin Management Plan.

Funding the Programme of Measures

The expenditure on measures to fully implement the River Basin Management Plan and Programme of Measures is difficult to fully describe as many of the measures, particularly the expenditure relating to the mandatory basic measures are inextricably embedded with other expenditure in the public sector (For example, the administrative costs relating to the enforcement of the Good Agricultural Practices Regulations). However, in the case of new, additional supplementary measures it is possible to provide a minimum, conservative estimate of the investment as these were explicitly established to respond to the requirements of the River Basin Management Plan objectives, where it was judged that the 'Basic' mandatory measures would not be sufficient on their own to achieve those objectives.

Tables 17 and 18 show conservative minimum estimates of major national expenditure on supplementary measures (1) during the second-cycle RBMP from 2016 to 2021 and (2) projected for the third-cycle RBMP from 2023 to 2027. Note that this does not incorporate additional expenditure on mandatory basic measures such as the increased resources within local authorities and the EPA to service the enhanced enforcement of the Nitrates Action Programme.

During the second-cycle, expenditure on additional supplementary measures was over €302million (2016-2021). Investment in Supplementary Measures were mainly focussed on the dominant pressures on surface waters to date. While the three dominant pressures for Ireland are agriculture, urban wastewater discharges and pressures on hydromorphology, the bulk of investment in supplementary measures in Cycle 2 were focussed on agriculture and urban wastewater treatment. In the case of pressures on hydromorphology, while a significant pressure, our knowledge and understanding of the ecological impact of this pressure and the required measures was not sufficiently robust during the second-cycle to commit significant funding for restoration measures. However, for Cycle 3 the investment in restoration/ mitigation will be significantly ramped up using the inventory of barriers generated by IFI. These will be a key focus for Ireland during the third-cycle RBMP (See Appendix 1 for further information). It will build

on the hydromorphology research and development programme undertaken during the second-cycle.

The projected expenditure for the third-cycle RBMP from 2023 to 2027 is a conservative minimum of €716.5million. This is an increase of 137% on the estimated expenditure for Cycle 2 (2015-2021). However, this investment may be increased by government as a more precise picture emerges at the local level through the 46 Catchment Management Work Plans regarding the measures needed and as more accurate estimates of the cost of measures are made. This plan commits to review progress with the implementation of measures and to reapply the Distance to Target Analysis.

In Chapter 5 (Programme of Measures) there is a commitment to carry out a mid-term progress review of the Programme of Measures by 2025 for the identification of additional, evidence based measures where gaps exist. There will be a plan for their implementation as soon as possible within the period of the plan or beyond, where justified under Article 4 of the WFD. It is anticipated that the newly established Infrastructure, Climate and Nature Fund (ICNF, see Section below) will potentially be a significant source of funding for these additional, evidence based measures for bridging the gap in achieving fully WFD compliance.

A particular challenge in managing water resources effectively and sustainably into the future is incorporating the value of these resources effectively into economic decision making. In order to put a value on these resources, sectors must first understand and be aware of the services that catchments provide them with and the value that they obtain from these services. Therefore, the immediate task ahead for environmental authorities is to communicate and raise awareness of the services gained by society from catchments. The ongoing mapping of ecosystem services across the EU, including Ireland, should help to inform this awareness raising.

Econ 2: The cost effectiveness of new supplementary measures, such as the Water EIP and Barriers Mitigation Programme, will be analysed as soon as possible after they have been commenced and once there is sufficient progress made. The programmes will be modified, if and where necessary, to ensure that they are delivering value for money to the State.

Econ 3: The economic regulator of water services (the CRU) will continue to assess and approve Uisce Éireann's costs and investment plans. This will include an assessment of Uisce Éireann's investment decisions to ensure effectiveness, efficiency and value-for-money in Uisce Éireann's expenditure. The CRU will continue to monitor and report annually on Uisce Éireann's delivery and performance in that context.

Econ 4: Uisce Éireann to implement the National Water Resources Plan and associated regional plans and to maintain national water and wastewater capacity registers to ensure security of supply and sufficient capacity in drinking and wastewater networks to inform decisions on balanced regional development in line with the National Planning Framework.

Econ 5: When approved, Uisce Éireann to implement domestic excess use and non-domestic charging.

Econ 6: The Minister will publish a report based on an economic assessment on the potential for a natural capital / freshwater ecosystem services approach to protecting water resources, including the need for new economic instruments and protection of freshwater and marine ecosystem services.

Econ 7: The Minister will maintain a funding stream to upgrade and take in charge towns and villages without wastewater networks to improve the wastewater needs of rural villages that are outside of the current Uisce Éireann collection network.

Econ 8: Uisce Éireann will update the current Water Services Strategic Plan to cover the 25 year period of water services management up to 2050.

Econ 9: Finalise the review of rural water services and produce a rural water services strategic plan including a national rural water resources plan for the rural water sector.

Econ 10: Implement the policy as set out in "Irish Water – Towards a national, publicly-owned, regulated, water services utility" so that Uisce Éireann has integrated the day to day operation and delivery of water services into its own organisational structure, in place of the current Service Level Agreements, on a phased basis.

Future Ireland and Infrastructure, Climate and Nature Fund Act 2024

The Government enacted the Future Ireland and Infrastructure, Climate and Nature Fund Bill in March, 2024.

The Bill provides for the establishment of:

1. The Future Ireland Fund; and
2. The Infrastructure, Climate and Nature Fund.

The Bill will also provide for the funds to be owned by the Minister for Finance. They will be managed and invested by the National Treasury Management Agency (NTMA).

The Infrastructure, Climate and Nature Fund (ICNF)

In Ireland, fiscal policy has tended to be pro-cyclical and capital spending has been especially susceptible to pro-cyclicality. An adequately capitalised fund is an effective means to support counter-cyclical fiscal policy.

Of the total of €14 billion, €3.15 billion is available for designated environmental projects (projects that contribute directly or indirectly to the reduction of greenhouse gas emissions, an improvement in water quality or an improvement in nature and biodiversity objectives) between 2026 and 2030.

The allocation of funding to designated environmental projects will be subject to engagement between relevant Ministers and the Minister for Public Expenditure, NDP Delivery and Reform, in line with the standard Estimates process.

In each of the years from 2026 to 2030, the Minister for Public Expenditure, NDP Delivery and Reform, having consulted with the Minister for Finance, will recommend an amount to Government that he or she believes to be appropriate to drawdown from the ICN Fund, having regard to the total spend on designated environmental projects taking into account the annual limits of 22.5% of the Fund and the total expenditure on such projects not exceeding €3.15bn over the period 2026-2030.

Resourcing and drawdown from the ICNF to 2030

Each year €2 billion will be invested in the ICNF from 2024 to 2030, building a total contribution to the fund of €14 billion, with the €2 billion in 2024 coming from the dissolution of the National Reserve Fund. Any investment return will be retained within the Fund.

As outlined above it is intended to put in place triggers to allow the Minister for Finance to reduce contributions in part and in full to the Future Ireland Fund to deal with economic exigencies. Where contributions to the FIF are partially reduced it is intended to continue to the fund the ICNF with €2 billion per annum.

It is only where contributions to the FIF are stopped would contributions to the ICNF also be stopped. This is the trigger to allow for up to 25% of the ICNF to be deployed in the following fiscal year.

Econ 11: Where additional targeted measures are identified as necessary to address gaps in WFD environmental objectives for cycle 3, as part of the mid-term progress review of the Programme of Measures in 2025, DHLGH will oversee the preparation of project proposals for funding under the new Infrastructure, Climate and Nature Fund.

Table 17: Conservative minimum estimate of major national expenditure on second-cycle RBMP from 2016 to 2021

Supplementary Measure	Categories of supplementary measure	Pressure(s) addressed by measure	Responsible authority	Expenditure (2016-2021)
	(see WFD. Annex VI, Part B) #			(€)
Monitoring, assessment, reporting and regulation	(ii), (xv), (xvi)	All	Environmental Protection Agency	6,000,000
Local Authority Waters Programme	(ii), (iii), (xv), (xvi)	All	Local authorities	18,000,000
River Basin Management Plan specific agricultural measures under the Rural Development Programme		Agriculture		
Protection of Watercourses from Bovines	(iii)	Agriculture	Department of Agriculture, Food and the Marine	110,849,048
Riparian Margins	(iii)	Agriculture	Department of Agriculture, Food and the Marine	1,289,574
Agricultural Sustainability Support and Advice Programme (ASSAP)	(ii), (iv), (xv), (xvi)	Agriculture	Department of Agriculture, Food and the Marine; Department of Housing, Planning and Local Government; Dairy Industry	15,000,000
Public wastewater treatment infrastructure to achieve standards beyond those required by the Urban Wastewater Treatment Directive	(v), (xi)	Urban wastewater discharges	Irish Water (*now Uisce Éireann*) (national water services authority)	151,000,000
Total				**302,138,622**

Table 18: Conservative minimum projected estimate of major national expenditure on third-cycle RBMP from 2023 to 2027

Supplementary Measure	Categories of supplementary measure	Pressure(s) addressed by measure	Responsible authority	Expenditure (2023-2027)
	(see WFD. Annex VI, Part B) #			(€)
Monitoring, assessment, reporting and regulation	(ii), (xv), (xvi)	All	Environmental Protection Agency	6,000,000
Local Authority Waters Programme	(ii), (iii), (xv), (xvi)	All	Local authorities	18,000,000
River Basin Management Plan specific agricultural measures under the Rural Development Programme / CAP Strategic Plan		Agriculture		

Ecoscheme (€1.48 billion budget. Conservative estimate that 5% spent on measures benefitting water)	(iii)	Agriculture	Department of Agriculture, Food and the Marine	74,000,000
Acres Cooperation Projects (€740 million budget. Conservative estimate that 10% spent on measures benefitting water)	(iii)	Agriculture	Department of Agriculture, Food and the Marine	74,000,000
Acres General Scheme (€750 million budget. Conservative estimate that 5% spent on measures benefitting water)	(iii)	Agriculture	Department of Agriculture, Food and the Marine	37,500,000
Water EIP (€60 million budget. 100% of budget devoted to target water protection and restoration measures)	(iii)	Agriculture	Department of Agriculture, Food and the Marine and Department of Housing, Local Government & Heritage	60,000,000
Agricultural Sustainability Support and Advice Programme (ASSAP)	(ii), (iv), (xv), (xvi)	Agriculture	Department of Agriculture, Food and the Marine; Department of Housing, Local Government & Heritage; Dairy Industry	15,000,000
Waters of LIFE Integrated project (€20 million budget. 100% of budget devoted to target water protection and restoration measures))	(ii), (iii), (xv), (xvi)	All	Department of Housing, Local Government & Heritage	20,000,000
Public wastewater treatment infrastructure to achieve standards beyond those required by the Urban Wastewater Treatment Directive	(v), (xi)	Urban wastewater discharges	Uisce Éireann (national water services authority)	288,000,000
Hydromorphology restoration/mitigation programme (Minimum estimated budget of €50 million. 100% of budget devoted to target water protection and restoration measures))			Inland Fisheries Ireland	110,000,000
Hydromorphological improvements at public drinking water abstractions that are supported by in-stream structures		Pressures on Hydromorphology	Uisce Éireann	14,000,000
Total				**716,500,000**

Table 19: List of Supplementary Measures categories referred to in Table 1 above

# List of Supplementary Measures categories in Annex VI (Part B) of the Water Framework Directive	
(i) legislative instruments	(x) efficiency and reuse measures, inter alia, promotion of water-efficient technologies in industry and water-saving irrigation techniques
(ii) administrative instruments	(xi) construction projects
(iii) economic or fiscal instruments	(xii) desalination plants
(iv) negotiated environmental agreements	(xiii) rehabilitation projects
(v) emission controls	(xiv) artificial recharge of aquifers
(vi) codes of good practice	(xv) educational projects
(vii) recreation and restoration of wetlands areas	(xvi) research, development and demonstration projects
(viii) abstraction controls	(xvii) other relevant measures
(ix) demand management measures, inter alia, promotion of adapted agricultural production such as low water requiring crops in areas affected by drought	



9

List of Actions

Ref	Action	Owner	Timescale
Action 1.1	Integrated catchment management approaches will be used to identify and decide on further specific measures for each water body, where they are required in addition to those set in this plan. These will be included in the 46 Catchment Management Work Plans, which will be used to locate measures within each catchment. The co-benefits of water-focused measures on climate and biodiversity will also be identified.	LAWPRO	Ongoing
Action 1.2	The Catchment Management Work Plans will include the list of water bodies, their associated status, significant pressures/issues and targeted measures, along with outcomes-based targets for the third-cycle and key performance indicators to monitor progress and outcomes. Justification for water bodies not meeting their WFD objective by 2027 should also be included in catchment management plans, in line with Article 4 of the WFD.	LAWPRO	Ongoing
Action 1.3	Sectoral Action Work Plans will be developed. They will set out the actions to be taken by the relevant authorities in line with their legally binding general duties under Article 3(1) of the 2003 Water Policy Regulations (SI 722 of 2003).	DHLGH	Q1 2025
Action 1.4	When developing new policy, Government Departments will have regard to the OECD principles for policy coherence to consider cross-cutting issues; trade-offs and synergies with other key policy objectives.	Whole of Govt	Ongoing
Action 2.1	The DHLGH shall continue to engage with counterparts in Northern Ireland via the North/South Water Framework Directive Co-ordination Group as is necessary to ensure coordination of programmes of measures across the whole of shared river basin districts.	DHLGH	Ongoing
Action 2.2	A collaborative 'Shared Waters' document will be published following publication of the River Basin Management Plans of the Republic of Ireland and Northern Ireland.	DHLGH (WAU)	Q3 2024
Action 3.1	DHLGH will arrange for the development and application of a methodology for the screening and application of WFD Article 4(5) exemptions, extending the deadline for compliance beyond 2027, where justified in accordance with the strict criteria stipulated within the Directive.	DHLGH	Q4 2024-Q4 2025
Action 3.2	DHLGH will review and update the Climate Adaptation Plan for the Water Quality and Water Infrastructure Sectors.	DHLGH (WAU)	Q4 2024
Action 3.3	LAWPRO will co-ordinate a simplified climate change sensitivity analysis or "climate check" which will be undertaken in line with EU Guidance during the third RBMP cycle at the level of the Catchment Management Work Plans. The check will also inform the setting of RBMP environmental objectives for the following fourth-cycle.	LAWPRO	2025

Ref	Action	Owner	Timescale
Action 3.4	The EPA will review the national monitoring programme and integrate climate change considerations such as identifying water bodies likely to be most vulnerable to climate change and detecting the direct impacts of climate change.	EPA	Q2 2026
Action 3.5	Support additional research and pilot projects in the area of climate change (impacts and adaptation).	DHLGH (WAU) / NFGWS	2022 - 2027
Action 3.6	The National Bathing Water Expert Group to undertake a research project to determine the most suitable approach to protecting bathers' health outside of the current bathing season.	DHLGH (WAU)	2024
Action 3.7	DHLGH will amend the existing Bathing Water Regulations (S.I. No. 79 of 2008) to facilitate local authorities defining the length of the "bathing season" on determining the bathing season for individual bathing waters in respect of the "bathing waters" within their jurisdiction. DHLGH will also consider the research outcomes and recommendations from the National Bathing Water Expert Group. The outcome of the EU regulatory fitness and performance programme (REFIT) review of the Bathing Water Directive will be assessed in due course.	DHLGH	Q4 2024
Action 3.8	The water-related requirements of water-dependant habitats and species will be reviewed by the Water Division, the National Parks and Wildlife Service and the EPA during the 3rd RBMP cycle, taking account of the most recent scientific evidence. If necessary, proposals for updating the related water standards will be made and this will be integrated into the catchment management process.	DHLGH (NPWS & Water Division) and EPA	Q1-Q4 2025
Action 3.9	The National Parks and Wildlife Service and the Water Division, both of this Department, and other relevant stakeholders will continue to engage closely in the catchment management planning process as it relates to Freshwater Pearl Mussel to ensure conformity with the requirements of the Habitats Directive and the Water Framework Directive.	DHLGH / NPWS	Ongoing
Action 3.10	The Minister for Housing, Local Government and Heritage will undertake a short public consultation before deciding whether to designate or de-designate water bodies as HMWBs. There were 466 water bodies, which the EPA has found to meet the criteria for designation. The Minister will take into account the recommendations of the EPA and the key concerns raised in the submissions to the consultation process.	DHLGH	Q4 2024
Action 3.11	A review of arterial drainage requirements and the underpinning Arterial Drainage Act will be undertaken in order to inform future land use policy decisions arising out of the Land Use Review and to support the preparations for the implementation of the new Nature Restoration Law and the Heavily Modified Water Body review process.	DECC / DHLGH (Water Policy & WAU) / DAFM / OPW	TBC

Ref	Action	Owner	Timescale
Action 4.1	The EPA and LAWPRO, with the support of the implementing bodies and other stakeholders, will continue to assess the impacts of pressures on waters to inform the measures that are needed.	EPA / LAWPRO	Ongoing
Action 5.1	The Department of Housing, Local Government and Heritage will oversee an independent review of progress with the implementation of the Programme of Measures.	DHLGH (WAU)	Q2 2025
Action 5.2	The National Technical Implementation Group will identify the issues preventing water quality objectives from being achieved and will identify any further evidence, legislative, policy or implementation gaps that need to be addressed.	EPA	Ongoing
Action 5.3	LAWPRO will confirm significant pressures and work with implementing bodies and stakeholders to promote the implementation of appropriate restoration measures in each Area for Action (restoration) where environmental objectives are not being met.	LAWPRO	Ongoing
Action 5.4	LAWPRO will confirm significant pressures and work with implementing bodies and stakeholders to progress the implementation of appropriate protection measures in areas that are meeting their environmental objectives but require protection to ensure that water quality does not deteriorate.	LAWPRO	Ongoing
Action 5.5	LAWPRO, in cooperation with the EU LIFE IP Waters of LIFE project team, will publish a new Blue Dot Programme work plan for waters with a High Status Objective.	LAWPRO	2024
Action 5.6	Catchment projects aimed at improving water quality to be advanced in 15 areas (including community initiatives, River Trusts, EIPs, PEACE+)	Catchment Project lead organisation	Ongoing

Ref	Action	Owner	Timescale
Agri 1	DHLGH and DAFM will oversee the implementation of the stronger and more targeted Nitrates Action Programme. The Fifth Nitrates Action Programme (2022-2025) retains and strengthens the existing controls from agricultural nutrient impacts on water and will implement tighter controls on nitrogen and phosphorus inputs by: 1) Stipulating tighter controls on the timing and methods of application of chemical nitrogen fertilisers and slurry. 2) Reducing the annual maximum fertilisation rate of nitrogen on grassland by 10% in 2022 with potential for a further reduction of, at least, 5% in 2024 following the Interim Review in 2023. 3) Reduction in the maximum derogation stocking rate on farms in water bodies where there is, or a risk of, declining water quality. 4) Implementing a livestock excretion banding system from Q1 2023 to more accurately reflect the different rates of organic nitrogen loading from different sized animals in the maximum stocking rate calculations. 5) Establishing a national fertiliser sales database for farmers.	DHLGH (WAU)	2025
Agri 2	Local Authorities will strengthen the inspection and enforcement relating to agricultural diffuse pollution. A total of 57 new Inspectors in local authorities have been allocated for the National Agricultural Inspection Programme (NAIP) and five new staff have been allocated to the EPA to oversee the programme. An additional four staff have been allocated to LAWPRO to help in co-ordinating the activity and avoiding duplication where possible. Inspections will be targeted and risk-based using all the available evidence, including water quality data, the EPA's PIP Maps and the Targeting Agricultural Measures Map on up to 4,500 farms per annum during the lifetime of the Nitrate Action Programme. DAFM will undertake 500-1,000 inspections per year under the GAP Regulations focused in Q1 where risk of nutrient impact on water quality is high. DAFM has increased their derogation inspections from 5% to 10% of all derogation farms per year and will undertake approximately 700 inspections per annum.	EPA/NIECE	2022 - 2024
Agri 3	DAFM will implement Ireland's CAP Strategic Plan with a strong emphasis on the achievement of a higher level of environmental ambition. This includes implementing the new Green Architecture of (1) Conditionality, (2) Pillar I Eco-Schemes and (3) the Pillar II Interventions such as ACRES and the new Water EIP.	DAFM	2023 - 2027

Ref	Action	Owner	Timescale
Agri 4	Eco-scheme measures will contribute to the protection of water quality. DAFM will promote and target the uptake of these measures in locations at farm level where they will maximise water protection. This will be achieved through training and farm advisory services and by using the Pollution Impact Potential (PIP) maps generated by the EPA.	DAFM	2027
Agri 5	The Water EIP project led by LAWPRO, in partnership with Teagasc and Dairy Industries Ireland will focus on reducing losses of phosphorus, nitrogen, sediment and, where relevant, pesticides to water from agricultural lands by promoting the adoption of innovative best practice in nutrient management, the application of Nature-based Solutions and other suitable measures. The project will aim to support up to 15,000 farmers in implementing on-farm water protection and mitigation measures.	LAWPRO	2027
Agri 6	DHLGH and DAFM will put arrangements in place to ensure independent assessments and reviews of the efficacy of the Nitrates Action Programme (NAP), the CAP Strategic Plan and the Water EIP (and other relevant measures) to bring the 1,000 water bodies impacted by agriculture up to good status and to prevent deterioration. They will identify additional measures, where necessary, which will be implemented during the lifetime of the plan or beyond, where justified under Article 4 of the WFD. Mechanisms for review will include; DHLGH monitoring & assessment of progress with the programme of measures, EPA's statutory role in assessing the NAP, EPA research projects and the CAP Strategic Plan Performance Monitoring and Evaluation Framework (PMEF).	DHLGH	Q4 2025
Agri 7	In support of the Catchment Management Work Plans, the Department of Agriculture, Food and the Marine will publish an Agricultural Sectoral Action Work Plan to reduce nitrogen losses to waters in areas where levels are increasing or are too high, and to bring nitrogen, phosphorous and sediment losses to water from agricultural sources within sustainable levels by 2027.	DAFM	2024
Agri 8	Online Farm Sustainability Planning: Teagasc will develop an online Farm Sustainability Plan for farmers complementing existing Nutrient Management Planning online tool to support the wider Agricultural Knowledge and Information Systems (AKIS) programme.	Teagasc	2024
Agri 9	Extend and expand the local authorities' water protection office. LAWPRO will be extended for the full duration of Cycle 3 up to 2027. The CCMA will identify the appropriate level of resources and involvement of LAWPRO to meet WFD objectives up to 2027 and beyond in future RBMPs.	LAWPRO	Q4 2021

Ref	Action	Owner	Timescale
Agri 10	Provide free on-farm advice to farmers. The sustainability advisory service (ASSAP) will be extended for the full duration of Cycle 3. The dairy industry has increased the number of advisors involved in ASSAP by six for the period 2022 to 2027.	DHLGH / DAFM/ Dairy Industry	Q3 2023
Agri 11	To support the goal of targeting the right measure in the right place all farm advisers involved in the 'Farming for Water' Agri-EIP, will be provided with ongoing professional development, including an appropriate level of catchment science training to ensure that measures are sufficiently targeted.	LAWPRO / Teagasc	Ongoing
Agri 12	Upskill farmers and advisors to ensure they have the knowledge and tools to implement appropriate measures to reduce the impact on water quality and freshwater biodiversity from farming practices.	Teagasc / ACA / Farm Advisors	Ongoing
Hymo 1	A Hydromorphology Expert Group will be established to support the new National Hydromorphology Programme. This Expert Group will identify interim measures which will be readily implemented during the third RBMP cycle to assist in removing pressures on hydromorphology.	DHLGH (WAU)	2024
Hymo 2	DHLGH will lead the development of a new enhanced and consolidated legislative regime to address pressures on the physical condition of waters.	DHLGH (WAU)	2026
Hymo 3	IFI will establish a restoration programme to mitigate the negative impact of past construction in or near water bodies.	DHLGH / DECC / IFI	2027
Hymo 4	A Sectoral Action Work Plan for Hydromorphology will be developed, which will include measures and plans to address the 448 water bodies at risk from pressures from hydromorphology, including barriers, channelization, drainage, sediment and flood protection. It will be led and coordinated by DHLGH with supporting bodies IFI, DAFM, Forestry, OPW and DECC.	DHLGH	Q4 2024
Hymo 5	It is proposed that IFI will lead a multi-agency whole of catchment pilot project on the River Dodder from source to sea with the aim of examining the feasibility of opening up this heavily urbanised catchment to migratory fish species by mitigating the five most significant barriers in the lower reaches and progressing to the next stage, as appropriate.	IFI	2024 - 2027
Hymo 6	IFI will lead a pilot project to be undertaken for the Annacotty Weir in County Limerick. The project will provide an opportunity to test a collaborative and ecology focussed design approach. It will also test enhanced community engagement opportunities that go beyond the standard consultation practices involved in the planning process, thereby assisting with the design and implementation of the national restoration programme. The pilot project is initially examining the feasibility of mitigation and will progress to the next stages, as appropriate.	IFI	2025

Ref	Action	Owner	Timescale
Hymo 7	Implementation of the roadmap of actions, including the use of state-of-the-art technical solutions, to improve fish migration in the lower Shannon at the Hydroelectric scheme located around Parteen and Ardnacrusha. The pilot project will initially examine the feasibility of mitigation and will progress to the next stages, as appropriate.	DHLGH (WAU)	2027
Hymo 8	A proposed pilot project on the Slaney River at Clohamon will aim to improve fish passage at a medium scale hydroelectric scheme through a state and community collaborative initiative. The pilot project will initially examine the feasibility of mitigation and will progress to the next stages, as appropriate.	IFI	2024 – 2027
Hymo 9	In addition to river barrier removal and mitigation other restoration and mitigation work will be developed. This will be partly guided by the framework for prioritising measures for both river restoration and Nature-based Catchment Management prepared by the EPA.	DHLGH (WAU)	2026 onwards
Action 3.10 repeat	The Minister for Housing, Local Government and Heritage will undertake a short public consultation before deciding whether to designate or de-designate water bodies as HMWBs. There were 466 water bodies, which the EPA has found to meet the criteria for designation. The Minister will take into account the recommendations of the EPA and the key concerns raised in the submissions to the consultation process.	DHLGH	Q4 2024
Action 3.11 repeat	A review of arterial drainage requirements and the underpinning Arterial Drainage Act will be undertaken in order to inform future land use policy decisions arising out of the Land Use Review and to support the preparations for the implementation of the new Nature Restoration Law and the Heavily Modified Water Body review process.	DECC / DHLGH (Water Policy & WAU) / DAFM / OPW	TBC
Forestry 1	In support of the Catchment Management Work Plans, the Department of Agriculture, Food and the Marine will publish a Sectoral Action Work Plan. DAFM will update the 2018 document "*Forests and Water: Achieving Objectives under Ireland's River Basin Management Plan 2018-2021"* as the Forestry Sectoral Action Work Plan supporting the third RBMP.	DAFM - Forestry Inspectorate	2024 and ongoing
Forestry 2	DAFM recognises the key recommendation from the HYDROFOR Project (2016) to "cease afforestation on peat soils in acid-sensitive headwater catchments", and is applying various water and non-water related policies, procedures and protocols that combine to rule out afforestation on such sites, or to limit it to appropriate multi-benefit native woodland.	DAFM - Forestry	Ongoing
Forestry 3	DAFM to increase the area of forests with appropriate water setbacks through the ongoing restructuring of existing forest stands at clearfell / reforestation stage.	DAFM - (Forestry Inspectorate and Forestry Division)	Ongoing

Ref	Action	Owner	Timescale
Forestry 4	DAFM to ensure the application of water setbacks and other water-based protection during the creation of new forests, principally realised with support under the 2023 – 2027 Afforestation Scheme.	DAFM - Forestry	Ongoing
Forestry 5	DAFM to manage the application of support measures that have a clear role in relation to the protection of water, including: the Continuous Cover Forestry Scheme; the various native woodland and agro-forestry options under the Afforestation Scheme, the Native Woodland Conservation Scheme, and the Reforestation for Climate Resilience Scheme.	DAFM - Forestry	Ongoing
Forestry 6	DAFM to encourage the uptake of Forest Type 3 under the Afforestation Scheme, aimed at funding native woodland creation on public land, specifically to deliver woodland-based solutions for the protection of drinking water sources and water in general.	DAFM - Forestry	Ongoing
Forestry 7	DAFM to launch the new Forests for Water option (Forest Type 2) under the Afforestation Scheme, which offers added incentives to farmers and other landowners to promote the creation of new native forests specifically to provide water services, including improvements to water quality, drinking water source protection, natural water retention, the improvement of aquatic and riparian habitats, and the expansion of alluvial woodland.	DAFM - Forestry	2024
Forestry 8	DAFM to continue to address all forestry-related water incidents, as identified by DAFM Inspectors and LAWPRO or reported to DAFM Forestry by foresters, water agencies, environmental NGOs and members of the public.	DAFM - Forestry Inspectorate	Ongoing
Forestry 9	DAFM to train Registered Foresters, Consultant Ecologists and machine operators, in relation to the design, and implementation of forestry projects, from the perspective of protecting and enhancing receiving waterways.	DAFM - Forestry	2027
Forestry 10	Continue to seek improvements to the licence applications process for key forestry activities.	DAFM - (Forestry Inspectorate and Forestry Division)	2027
UWW 1	Uisce Éireann will continue investment in wastewater infrastructure investing over €2.3bn over the period 2020 – 2024. This includes 108 wastewater treatment plants and 77 collection networks at an estimated cost of €1.542bn and 92 national programmes at an estimated cost of €780m.	Uisce Éireann	Q4 2024
UWW 2	Uisce Éireann will deliver infrastructure projects as set out in the Appendices for the next RBMP third-cycle (2022-2027).	Uisce Éireann	Q4 2027
UWW 3	Uisce Éireann will assess urban wastewater requirements for the 197 Water Bodies where Urban Wastewater has been identified as a significant pressure by 2027, including any new significant pressure water bodies identified by LAWPRO.	Uisce Éireann	Q4 2022 and reviewed every 2 years

Ref	Action	Owner	Timescale
UWW 4	Uisce Éireann will apply for reviews of Wastewater Discharge Authorisations, where required. The applications shall be in a timeframe that is appropriate to the delivery programme and agreed with the EPA.	Uisce Éireann	Ongoing
UWW 5	DHLGH will deliver a multi-annual investment programme to provide wastewater infrastructure for villages not served by public wastewater collection systems.	DHLGH (Rural Water	Q2 2022
UWW 6	Uisce Éireann's River Basin Management Plan – Enhanced Ambition Programme will deliver at least 10 new wastewater treatment plant upgrades not funded under the current investment plan where discharges have been identified as being significant pressures on water bodies and impacting on WFD objectives.	Uisce Éireann	Q3 2022
UWW 7	Uisce Éireann will continue investment in storm water overflows with a minimum of 139 upgrades over the period 2022-2027.	Uisce Éireann	2027
UWW 8	Following the completion of negotiations, DHLGH will undertake transposition into Irish law of the recast Urban Wastewater Treatment Directive.	DHLGH (WAU)	Q3 2022 to Q2 2027 (estimated)
UWW 9	Following the expected recast Urban Wastewater Treatment Directive the DHLGH will update the criteria for the performance of Combined Storm Water Overflows.	DHLGH (WAU)	Q2 2028 depending on revision of UWWTD
UWW 10	Uisce Éireann will put in place a Research & Innovation Programme on nature-based solutions for small wastewater treatment plants.	Uisce Éireann	Q4 2027
UWW 11	As part of the distance to target analysis process led by the EPA, the impact of Sectoral Action Work Plans, including that for urban wastewater discharges, will be assessed as part of the preparation of the 46 Catchment Management Work Plans. Uisce Éireann will publish a Sectoral Action Work Plan. The Sectoral Action Work Plan for urban wastewater discharges will include further detailed information on the targeting of measures to address the 197 water bodies at risk from urban wastewater discharges during the third-cycle.	Uisce Éireann	2024
UWW 12	Uisce Éireann will engage with LAWPRO with the data required for their work in compiling the 46 catchment work plans and also trialling the Catchment Management Work Plans template in the 5 pilot catchments.	LAWPRO	2027
UWW 13	Continue to develop and update the distance to target/Gap Analysis as a tool to reflect Uisce Éireann's understanding of future needs, and consequent investment requirements.	Uisce Éireann	Q4 2024 with regular subsequent updates, typically every 2 years
UWW 14	Update the Nutrient Sensitive Areas designations under the Urban Wastewater Treatment Directive.	DHLGH (WAU)	4 year cycle
Urban Runoff 1	LAWPRO in conjunction with DHLGH to develop recommendations for an implementation strategy for nature-based Sustainable Urban Drainage Systems on a national scale.	DHLGH (WAU)	Q4 2021

Ref	Action	Owner	Timescale
Urban Runoff 2	DHLGH to provide interim guidance documentation to the Local and Planning Authorities on measures to be implemented to support the delivery of a greater focus on nature-based solutions in advance of a national implementation strategy.	DHLGH (WAU)	Delivered Q4 2021
Urban Runoff 3	Develop a National Implementation Strategy for Nature-based Sustainable Urban Drainage Systems on a national scale.	DHLGH (WAU)	2027
Urban Runoff 4	DHLGH to establish a pilot project to investigate solutions to urban runoff using Nature-based Solutions.	Dublin City Council & Cork County Council	2027
Urban Runoff 5	Additional resources will be provided to LAWPRO to provide specialist support to local authorities in adopting international best practice on nature-based surface water management within planning and infrastructure project delivery.	CCMA	Q4 2023
Urban Runoff 6	The DHLGH will work with NIEA to seek Peace Plus funding projects, which will trial Nature-based Solution measures and sustainable technologies.	DHLGH and NIEA	2027
Urban Runoff 7	Review of outcomes of the Dublin Urban Rivers Life project.	DHLGH (WAU)	2026
Urban Runoff 8	Oversee the preparation of integrated urban drainage management plans.	Uisce Éireann	2027
Domestic WW 1	DHLGH will continue to promote and monitor the uptake of the new grant schemes to ensure adequate numbers of people are availing of this measure. A research project will be initiated under the ESRI Research Programme on behaviours and attitudes to assess the level of uptake, impediments to uptake and to make recommendations for improving uptake.	DHLGH (Rural Water)	2024
Domestic WW 2	A review of the National Inspection Plan (NIP) 2018-2021 was completed, with the outcome informing the next NIP for the period 2022-2027. An objective of these plans is to prioritise inspections to areas of greatest environmental and public health risk and secure upgrading works where required.	EPA	Q4 2021
Domestic WW 3	Local Authorities to engage with householders to improve general awareness of septic tank maintenance requirements, and to address any failing septic tanks.	EPA and LA	Ongoing
Domestic WW 4	Local Authorities to complete 5,800 inspections between 2022 and 2026 under the National Inspection Programme.	EPA and LA	2026
Domestic WW 5	The Department of Housing, Local Government and Heritage to issue a policy direction to Local Authorities regarding Advisory Notices and Local Authorities to enforce advisory notices under the National Inspection Plan.	DHLGH (Rural Water)	Ongoing
Domestic WW 6	DHLGH to consider the outcomes of the research project into the application of zero discharge nature-based solutions and their applicability or not within Ireland's climatic conditions.	TCD / Leitrim County Council	Q2 2025

Ref	Action	Owner	Timescale
Domestic WW 7	Review the outcomes of the pilot projects under the first multi-annual Developer-Provided Water Services Infrastructure Resolution Programme to inform future policy considerations on resolving sub-standard developer provided infrastructure with sustainable solutions.	DHLGH (Rural Water)	Q3 2022
Unknown 1	The Local Authority Waters Programme (LAWPRO) will conduct assessments of water bodies in Priority Areas for Action where the pressures are unknown to identify the specific issues and actions that are required to protect or restore water quality as necessary.	LAWPRO	Q4 2027
Unknown 2	Each local authority supported by LAWPRO will conduct assessments of other water bodies where the pressures are unknown (which are not within priority areas for action) to identify the specific issues and actions that are required to protect or restore water quality as necessary.	Local Authorities	Q4 2027
Unknown 3	The Local Authority Services National Training Group (LASNTG) will provide appropriate training programmes including on Catchment assessment, Integrated Catchment Management, and farm inspections for the staff of local authorities and all implementing bodies.	LAWPRO	Ongoing
Other 1	DHLGH will prepare a proposal for enacting abstraction regulations.	DHLGH	Q2 2024
Other 2	The EPA, as competent authority will work with stakeholders to identify mitigation measures for abstractions determined to be significant pressures, and through the abstraction licensing process, require the implementation of relevant mitigation measures.	EPA (Regulator) and Uisce Éireann and/or Asset Owner where appropriate	Ongoing
Other 3	The need for exemptions will be reviewed as the abstraction licensing process is rolled out.	DHLGH (WAU)	Ongoing
Peat 1	Measures set out in the National Peatlands Strategy to be updated into a new Implementation Plan by NPWS.	NPWS	Q1 2023
Peat 2	In support of the Catchment Management Work Plans, the NPWS will publish a Sectoral Action Work Plan. Measures set out in the National Peatlands Strategy to be updated into the Sectoral Action Work Plan by NPWS.	NPWS	2024
Peat 3	Continuation and expansion of NPWS national programme of peatland restoration on SAC and NHA raised bogs, blanket bogs and fens.	NPWS	Ongoing
Peat 4	Bord na Móna to oversee the EU LIFE Integrated Project “Peatlands and People”.	Bord na Móna	2021-2028
Peat 5	NPWS and Geological Survey Ireland to fund an investigation into the causes of blanket bog landslides that occurred across Ireland in 2020, and the vulnerability of other at-risk areas to future failures.	NPWS & GSI	By Q3 2022
Peat 6	DAFM to oversee the implementation of sustainable management practices developed through the Blackstairs Mountains and Wicklow Mountains EIP projects within the ACRES East/South East Cooperation Project zone.	DAFM	Ongoing

Ref	Action	Owner	Timescale
Peat 7	Continuation of the Bord na Móna operated Enhanced Decommissioning, Rehabilitation and Restoration Scheme (EDRRS) to H2 2026.	DECC / Bord na Móna	Q4 2026
Peat 8	Continuation of NPWS-led EU LIFE IP Wild Atlantic Nature programme, including the development of complementary projects such as enhancing restoration capacity through building projects such as Natura Communities, retrofitting programmes to reduce turf cutting in the Natura 2000 network of sites and development of a nature restoration programme compatible with Ireland's CAP Strategic Plan.	NPWS	2021-2029
IMQ 1	DHLGH will examine opportunities to further support businesses in taking on a water stewardship approach in their operations.	DHLGH (WAU)	Ongoing
Action 5.2 repeat	The National Technical Implementation Group will identify the issues preventing water quality objectives from being achieved and will identify any further evidence, legislative, policy or implementation gaps that need to be addressed.	EPA	Ongoing
Drinking Water 1	Development of Drinking Water Source Protection Framework and Guidelines to meet the requirements of the recast Drinking Water Directive, and incorporating the application of abstraction controls under the implementing regulations for the Water Environment (Abstractions and Associated Impoundments) Act 2022.	DHLGH (WAU)	2024
Drinking Water 2	A Sectoral Action Work Plan for Drinking Water will include measures and plans to address the source protection actions proposed under the Drinking Water Regulations. It will be coordinated by the DW Expert Group with support from Uisce Éireann, NFGWS and LAs.	DW Expert Group (DHLGH)	2024
Invasive 1	Finalise legislation for the implementation of the EU Invasive Alien Species (IAS) Regulation.	NPWS	2024
Invasive 2	Implementation of existing management plans and Priority Pathway Action Plans (PPAP) for priority invasive species, and drafting of a new PPAP for Soils and Spoil.	NPWS	Q2 2023
Invasive 3	In support of the Catchment Management Work Plans, the NPWS will publish a Sectoral Action Work Plan, which will include for the implementation of existing management plans and Priority Pathway Action Plans (PPAP) for priority invasive species, and drafting of a new PPAP for Soils and Spoil.	NPWS	2024
Invasive 4	Complete negotiations on the recruitment of additional Biodiversity Officers.	The Heritage Council	Q3 2023
Invasive 5	Include action on Invasive Alien Species (IAS) as a priority under Local Authority Biodiversity Grant Scheme. The Local Biodiversity Action Fund provides Local Authorities with funding to target actions in the National Biodiversity Action Plan. Projects that include the mapping and appropriate treatment of IAS are listed as priorities within this funding stream.	NPWS	Ongoing
Invasive 6	Develop a National Management Plan for Invasive Species, and bring to public consultation in early 2024.	NPWS	Q4 2024

Ref	Action	Owner	Timescale
HazChem 1	DHLGH will amend the EQS Regulations to take account of the assessment of River Basin Specific Pollutants (RBSPs) by the National Aquatic Environmental Chemistry Group (NAECG).	DHLGH (WAU) & EPA	Q4 2024
HazChem 2	DHLGH and EPA will input into the recently commenced EU work to revise the list of Priority Substances and Priority Hazardous Substances. This will include liaison with the EU Commission in relation to the proposed amendments to the EQS Directive.	DHLGH & EPA	2024
HazChem 3	Teagasc, ASSAP and DAFM, with support from LAWPRO, will implement specific actions in high risk catchments to protect water quality from toxic impacts arising from the handling, use and disposal of sheep dip.	DAFM / LAWPRO	TBC
Aqua 1	*Review of consents causing impacts*: DAFM will conduct a periodic review, and where necessary, update of controls contained in aquaculture consents.	DAFM	Q4 2024
Aqua 2	*Enhanced integration of WFD into Aquaculture Consents*: DAFM to enhance links between the aquaculture authorisation and the objectives of the Water Framework Directive.	DAFM / DHLGH	Q4 2024
Aqua 3	*Online Aquaculture licensing*: To encourage the active involvement of all interested parties DAFM is to launch an online mapping viewer of licensed aquaculture sites in Ireland including access to licence and licence application information.	DAFM	2024
Aqua 4	*Enhanced Protection for Designated Shellfish Production Areas:* DHLGH will examine the need for amendments to legislation and whether a new management framework for shellfish waters in Ireland is needed.	DHLGH (WAU)	2026
Aqua 5	Complete the National Strategic Plan for Sustainable Aquaculture, including water quality measures.	BIM	Q1 2022
Land-Use 1	Finalise guidelines for the incorporation of the Water Framework Directive into the planning system and rollout of training on the new water and planning guidelines to practitioners.	DHLGH (WAU/EUIPR)	2025
Land-Use 2	Legislative provision to give effect to the new Water and Planning Guidance to be progressed.	DHLGH (EUIPR)	TBC
Coastal Action 1	Marine Protected Areas (MPAs) which are within the areas covered by the WFD (up to one nautical mile off shore) will be incorporated into the registered of protected areas under the WFD, once the legislation is enacted.	DHLGH	2024 - 2030
Action 6.1	LAWPRO will oversee the development of the template for the 46 Catchment Management Work Plans by Q2 2024.	LAWPRO	Q4 2024
Action 6.2	Implementing Bodies to engage with LAWPRO with the data required for their work in compiling the 46 Catchment Work Plans and also trialling the CMWP template in the 5 pilot catchments.	LAWPRO	Q3 2024
Action 6.3	DHLGH will establish a Programme Delivery Office to oversee and co-ordinate the many relevant bodies that manage, implement and enforce legislation and policies relevant to the Water Framework Directive.	DHLGH (WAU)	Ongoing

Ref	Action	Owner	Timescale
Action 6.4	DHLGH will review the roles and responsibilities of implementation bodies, shifting emphasis from the sharing of information and the provision of updates to a more focused provision of high-level policy direction, monitoring implementation of the Plan, and project management.	DHLGH (WAU)	Q3 2023
Action 6.5	An enhanced programme of formal and scheduled monitoring and reporting of progress in respect of the implementation of the RBMP will be put in place.	DHLGH (WAU)	Q3 2024
Action 6.6	National Oversight and Audit Commission (NOAC) will include appropriate water quality metrics in Key Performance Indicators for local authorities during the next review of indicators.	DHLGH (WAU)	Q4 2023
Action 6.7	Provide a continued emphasis on the full range of the regulatory mix, from awareness and education, through to norms and enforcement, with a review undertaken to ensure there is an appropriate balance in the third-cycle to ensure a greater emphasis on compliance assurance activity.	DHLGH (WAU)	Ongoing
Action 6.8	Specific capacity building programmes of work to be put in place to encourage the transfer of learning and knowledge.	LAWPRO	Ongoing
Action 6.9	Ensure further activation, development, and support of local level initiatives (rivers trusts, catchment partnerships) in support of the delivery of the RBMP.	LAWPRO	Q4 2023
Action 6.10	The Water Forum to identify and advise the Water Policy Advisory Committee (WPAC) and Minister on the optimum level of engagement with the implementation bodies, agencies and structures for the WFD to support implementation of the third-cycle, in accordance with its functions under Article 26 of the 2017 Water Services Act (Number 29).	DHLGH (WAU)	Ongoing
Action 6.11	Building on the excellent work already undertaken by the EPA, LAWPRO and various other bodies, DHLGH will provide further supports for the development of a National Water focused Citizen Science Strategy for the monitoring of water quality.	Citizen Science Coordination Committee / LAWPRO	Ongoing
Action 6.12	LAWPRO to evaluate the outcome of the Resilience Project for Rivers Trusts to inform future community engagement initiatives, including on citizen science.	LAWPRO	Q2 2023
Action 6.13	LAWPRO to examine ways in which further support can be provided for the formation and capacity building of local forums to help identify and implement measures.	LAWPRO	Q3 2024
Action 6.14	LAWPRO and DHLGH to review the operation of the Community Water Development Fund with a view to strengthening it.	DHLGH (WAU)	Ongoing
Action 6.15	LAWPRO will facilitate public participation in the development of the Catchment Management Work Plans through workshops for the 5 pilot catchments. This will inform the development and implementation of a national approach to public participation to deliver outcomes for water, climate and nature.	LAWPRO	Q2 2024

Ref	Action	Owner	Timescale
Action 6.16	The public participation pilots will provide learnings (which will then be implemented) on how agencies, local authorities, communities and landowners can work together to support action planning and project co-creation for a combined top-down bottom-up approach to the development and implementation of the 46 Catchment Management Work Plans.	LAWPRO	Q4 2024
Action 6.17	A review of the wider local authority structures will be progressed to inform future needs in the water area and to identify the appropriate level of resources and involvement required from the sector to meet WFD objectives.	CCMA	Q4 2023
Action 6.18	The Research Programme on Water will be continued into the third-cycle with an emphasis on water governance, economics and behavioural aspects of water protection.	DHLGH (WAU)	Ongoing
Action 6.19	Review to be undertaken of the Local Authority Waters Programme to identify necessary resources for the third-cycle and beyond to deliver the commitments under the WFD and future RBMPs.	LAWPRO	Q3 2021
Action 6.20	Review the outcomes of the IPA Governance Research programme on Ireland's water governance arrangements and implement their recommendations where appropriate.	DHLGH (WAU)	Ongoing
Action 6.21	Implement the recommendations of the External Expert assessment of the Agricultural Sustainability Support and Advisory Programme (ASSAP) during the third-cycle.	Teagasc	Ongoing
Action 6.22	Water protection provisions in relevant sectoral policies will be strengthened, where necessary. These include; water services policy, spatial planning policy, agricultural policy and aquaculture policy.	DHLGH (WAU)	Ongoing
Action 6.23	Measures that will deliver multiple policy objectives (e.g. water, biodiversity and climate adaptation/ mitigation) will be identified and embedded into sectoral policies.	DHLGH (WAU)	Ongoing
Action 7.1	Create opportunities for young people to engage, upskill and use their voice for sustainable development, through youth-led and youth-focused groups, organisations and networks.	DHLGH / DFHERIS / DECC	Ongoing
Econ 1	The DHLGH to undertake an evaluation including a stakeholder consultation of the appropriateness of water reuse for agricultural purposes within Ireland and report findings in the next River Basin Management Plan.	DHLGH (WAU)	2026/2027
Econ 2	The cost effectiveness of new supplementary measures, such as the Water EIP and Barriers Mitigation Programme, will be analysed as soon as possible after they have been commenced and once there is sufficient progress made. The programmes will be modified, if and where necessary, to ensure that they are delivering value for money to the State.	DHLGH (WAU)	End of 2027

Ref	Action	Owner	Timescale
Econ 3	The economic regulator of water services (the CRU) will continue to assess and approve Uisce Éireann's costs and investment plans. This will include an assessment of Uisce Éireann's investment decisions to ensure effectiveness, efficiency and value-for-money in Uisce Éireann's expenditure. The CRU will continue to monitor and report annually on Uisce Éireann's delivery and performance in that context.	CRU	2025- 2029
Econ 4	Uisce Éireann to implement the National Water Resources Plan and associated regional plans and to maintain national water and wastewater capacity registers to ensure security of supply and sufficient capacity in drinking and wastewater networks to inform decisions on balanced regional development in line with the National Planning Framework.	Uisce Éireann	2023
Econ 5	When approved, Uisce Éireann to implement domestic excess use and non-domestic charging.	Uisce Éireann	TBD
Econ 6	The Minister will publish a report based on an economic assessment on the potential for a natural capital / freshwater ecosystem services approach to protecting water resources, including the need for new economic instruments and protection of freshwater and marine ecosystem services.	DHLGH (WAU)	End of 2027
Econ 7	The Minister will maintain a funding stream to upgrade and take in charge towns and villages without wastewater networks to improve the wastewater needs of rural villages that are outside of the current Uisce Éireann collection network.	DHLGH (Rural Water)	Ongoing
Econ 8	Uisce Éireann will update the current Water Services Strategic Plan to cover the 25 year period of water services management up to 2050.	Uisce Éireann	Q2 2024
Econ 9	Finalise the review of rural water services and produce a rural water services strategic plan including a national rural water resources plan for the rural water sector.	DHLGH (Rural Water)	Q3 2024
Econ 10	Implement the policy as set out in "Irish Water – Towards a national, publicly-owned, regulated, water services utility" so that Uisce Éireann has integrated the day to day operation and delivery of water services into its own organisational structure, in place of the current Service Level Agreements, on a phased basis.	Uisce Éireann	Ongoing
Econ 11	Where additional targeted measures are identified as necessary to address gaps in WFD environmental objectives for cycle 3, as part of the mid-term progress review of the Programme of Measures in 2025, DHLGH will oversee the preparation of project proposals for funding under the new Infrastructure, Climate and Nature Fund.	DHLGH (WAU)	Q1 2026

www.gov.ie/RBMP

Department of Housing,
Local Government and Heritage



Rialtas na hÉireann
Government of Ireland

Rialtas na hÉireann
Government of Ireland

Water Action Plan 2024

A River Basin Management Plan for Ireland

Appendix 1: Programme of Measures: Further information on the environmental measures to 2027

Prepared by the Department of Housing, Local Government and Heritage
www.gov.ie/RBMP

Table of Contents

1. Agriculture. 4
2. Physical modifications to the flow, form and/or function of natural surface water bodies. 14
3. Forestry 22
4. Urban Wastewater. 28
5. Urban Runoff Pressures 31
6. Domestic Wastewater Discharges (Septic Tanks). 33
7. Unknown Pressures. 35
8. Other Pressures 36
9. Peatlands. 37
10. Industry, Mines and Quarries 40
11. Drinking Water Source Protection 41
12. Invasive Alien Species. 42
13. Hazardous Chemicals in the Aquatic Environment 44
14. Aquaculture 46
15. Land Use Planning. 48

[CABL #] = Citizen's Assembly on Biodiversity Loss cross-reference where indicated

1. Agriculture

Agricultural pressures on water bodies and water quality management

Agriculture is the main land use in Ireland. Farming and food production is now the primary human activity that is having an impact on the status of water bodies in Ireland.

Nutrients from farmland cause excess growth in water bodies (eutrophication) which disrupts the balance of the natural ecosystem and nitrates also put water supplies at risk; organic pollution damages ecosystems; pesticides damage aquatic invertebrates and water supplies; and physical changes to rivers and lakes can impede the natural ecology of watercourses. The latest precision and best-practice farming techniques do offer the potential to reduce emissions of nutrients to water from farms without impacting on productivity. Sustainable farms will continue to provide sustainable incomes while also benefiting nature. Farmland can also be managed to provide key eco-systems services, such as nature-based water management and flood protection, protection of ecosystems, restoration of biodiversity and carbon storage.

Too much fertiliser, pesticide and sediment is being lost from our farmland into water. The EPA has identified that diffuse or land based emissions from the agricultural sector is the primarily source of the upward trend in excess levels of nutrients *(EPA Water Quality in 2022 An Indicators Report)*. While there are impacts on **197** water bodies from urban wastewater, these have stabilised and reduced over the course of the first and second-cycles. Over the same period, the pressures from the agriculture sector have increased, particularly in areas with increased agricultural intensification and higher stocking rates of livestock.

Agriculture and food production is an important economic activity and the resilience of food supplies is important for people and our society. The agri-food sector is Ireland's most important indigenous industry, providing 165,000 jobs and accounting for 9% of Irish exports to over 180 countries and valued at €19 billion (*Department of Agriculture, Food and the Marine Annual Review and Outlook 2023*). The Government has committed to drive innovation and improvements in land management to reduce emissions to both air and water and to build on Ireland's green reputation for producing high-quality and sustainable produce, ensuring the long-term outlook for the agri-food industry is positive, vibrant and truly sustainable.

At a national level, loadings of phosphorus and nitrogen from all sources to the marine environment have increased since 2013. According to the EPA, the average nitrogen loads increased by 13% and average total phosphorus loads have risen by 36% between 2013 and 2022.

There has been an increase in the proportion of river sites with increasing nitrate concentrations in the most recent monitoring period (2016 – 2021) compared to 2013-2018. Up to 2018, 26.8% of sites were increasing in nitrogen concentrations compared to 39.4% up to the end of 2021. The areas of the country impacted by excess losses of nitrogen are mostly located in the more intensively farmed areas in the south, southeast and east of the country. The EPA completed an assessment of the catchments that need reductions in nitrogen concentrations to achieve water quality objectives in 2021. The key messages are provided in **Box 1** below. The assessment identifies catchments of concern where measures to reduce leaching should be targeted in the critical source areas to deliver maximum environmental benefits.

The proportion of sites with increasing phosphate concentrations has decreased; from 26% to 16.8% over the same period.

Box 1: Assessment of the catchments that need reductions in nitrogen concentrations to achieve water quality objectives (EPA 2021)

Assessment of the catchments that need reductions in nitrogen concentrations to achieve water quality objectives (EPA 2021)

Key Messages

- Elevated nitrogen concentrations in waters is one of the factors that leads to poor water quality outcomes in all waters. Estuaries and coastal waters, and groundwater drinking water supplies are particularly at risk.
- There are a number of key catchments of concern with elevated nitrogen concentrations along the south, southeast and east coasts including the Maigue/ Deel, Bandon, Lee, Blackwater, Suir, Nore, Barrow, Slaney, Tolka/Liffey and the Boyne river catchments.
- Nitrogen concentrations in waters have been increasing since 2013 — between 2013 and 2019, all but one of the catchments of concern showed increasing trends in the amount, or load, of nitrogen discharging to the sea via our rivers.
- The nitrogen load discharging to sea needs to be reduced in the catchments of concern to support healthy aquatic ecosystems. The scale of reduction needed ranged from zero in some years, to just over 8,000 tonnes of nitrogen in the Barrow catchment in 2018.
- The data show that in the predominantly rural catchments, more than 85% of the sources of nitrogen in the catchment are from agriculture, from chemical and organic fertilisers. In contrast, the majority of the nitrogen in Liffey/Tolka catchment, which incorporates Dublin City, is from urban wastewater.
- Maps have been developed of the critical source areas for nitrogen. These are the highest risk areas in the landscape where nitrogen from agriculture leaches to waters. Measures to reduce leaching should be targeted in the critical source areas, in the catchments of concern, to deliver maximum environmental benefits.

Programme for Government specific commitments

The Programme for Government 2020 includes a number of specific commitments to protect water quality from agricultural pressures. These include:

- Expanding programmes, including the Agriculture Sustainability Support and Advisory Programme (ASSAP), and working with farmers, industry, and advisory services, to protect and deliver improvements in water quality.
- Delivering an incremental and ambitious reduction in the use of chemical nitrogen fertiliser through to 2030.
- Reviewing the effects of the nitrates derogation on water quality, in conjunction with the EPA, which will inform future policy in this area.
- Working with nitrates derogation farmers to improve environmental outcomes on their farms, ensuring the sustainable use of the derogation, in line with our environmental objectives.

The River Basin Management Plan aims to deliver on these commitments through the Fifth Nitrates Action Programme, the new CAP Strategic Plan Regulations and the implementation of the additional measures listed in **Figure 1**.

Water Action Plan for Agriculture: Coordinating agricultural actions in catchments.

In support of the Catchment Management Work Plans, the Department of Agriculture, Food and the Marine (DAFM) will publish a Sectoral Action Work Plan to reverse the upward trend of nitrogen discharges and to bring nitrogen, sediment and phosphorous losses to water from agricultural sources within sustainable levels by 2027. The Sectoral Action Work Plan for Agriculture will include targeted measures to address the 1,000+ water bodies at risk from agriculture during the third-cycle, along with protection measures needed to prevent further deterioration. The aim of the plan will be a rapid graduated reduction of nitrogen, phosphorous and sediment losses to water bodies with a target to reach sustainable use and discharges in all catchments of concern by 2027 **(See Box 2).**

There is a long history of action and measures aimed at reducing nutrient pollution, primarily channelled through the Nitrates Action Programme (which in Ireland covers both nitrogen and phosphorous). This initially resulted, in combination with other measures, in a reduction in nutrient loadings up to the early 2010s. However, water quality indicators show that nutrient concentrations are currently too high across a significant proportion of our water bodies and these trends are not improving.

To reduce the impact on water, measures are needed to address nitrogen, phosphorous, sediment loss, physical changes to waterways and to reduce the impact from pesticides.

The loss of nitrogen could be reduced by having appropriate loading in each catchment, minimising chemical fertiliser applications, maintaining good soil health and by using alternative sources of nitrogen, particularly in catchment areas that are more prone to leaking nitrogen to waters. We must put in place nature-based buffers to cut off pathways that are carrying phosphorous and sediment into our waters. These actions will need to be supported and encouraged by industry led sustainability programmes; through practical farm-level advice, and by appropriate inspection and compliance checks to ensure that good agricultural practice is being adhered to by everyone.

Land and river channel alterations arising from agricultural activities are also a significant pressure on the physical condition of river channels. Additional and/or enhanced measures are now urgently required. The regulation of land drainage and river channel works will be enhanced and improved (see measures on Hydromorphology in Section 2).

Box 2: Phosphorous losses to water from agriculture

Phosphorous losses to water from agriculture

Phosphorous behaves differently to nitrogen, is less (but not entirely) related to intensity and requires a different set of measures to nitrogen loss reduction measures. These are being addressed by new and tailored measures under DAFM's "Green Architecture" of the CAP Strategic Plan for Ireland. There are three core elements within the 'Green Architecture' – Conditionality, Pillar 1 Eco Schemes and Pillar 2 climate and environmental interventions. These measures will be delivered through Pillar 2 interventions under CAP e.g. DAFMs Agri-Climate Rural Environment Scheme (ACRES), and the Water European Innovation Partnership (EIP) project ('Farming for Water'), which was developed collaboratively with DAFM. The Waters of LIFE projects is also applying a similar approach in six pilot high status objective catchments.

The types of measures envisaged for water protection in these areas (including Non-Productive Investments and practice changes) are also measures that will deliver both biodiversity and climate adaptation and mitigation benefits. Furthermore, it is proposed that the governance and implementation structures put in place to support the implementation of river basin management plans (LAWPRO and ASSAP) could be further strengthened and leveraged to support the implementation of the new measures under the CAP Strategic Plan.

Figure 1 - Coordinating measures across the agricultural sector to deliver improvements

Pollutant / Impacts

MEASURES	Nitrate	Phosphorus	Silt	Pathogens (e.g. VTEC)	Ammonia	GHGs	Pesticides	Biodiversity impacts
Strengthened Nitrates Regulations	✔	✔	✔	✔	✔	✔		✔
CAP Strategic Plan								
• Enhanced Conditionality	✔	✔	✔	✔	✔	✔	✔	✔
• Improved Eco-schemes	✔	✔	✔	✔	✔	✔		✔
• Strengthened Agri-environment-climate measures (AECMs)	✔	✔	✔	✔	✔	✔		✔
• An Expanded Farm Advisory System	✔	✔	✔	✔	✔	✔	✔	✔
Improved Land and river drainage controls		✔	✔	✔				✔
Implementation of New Drinking Water Source Protection Framework	✔		✔	✔			✔	✔
Ensuring the Sustainable Uses of Pesticides							✔	✔

Challenges for the agricultural sector in addressing significant pressures on waters

To achieve the goal of clean, healthy and well-protected water quality as measured by the objective of good water status there are a number of goals that need to be achieved by the agricultural sector. The sector targets for agriculture are:

1. To reduce the nitrogen load (tonnes) needed to achieve the Environmental Water Quality Standard of 2.6 mg/l N in the downstream estuaries by 2027 in the catchments of concern identified by the EPA assessment.
2. To reduce the mass loading of phosphate and sediment by establishing a minimum of 2,500 linear kilometres water interception measures (woodlands for water) representing 3% of all river channels.
3. Local authorities with DAFM support to identify, reduce and eliminate point source pollution from farmyards affecting water bodies by 2027.
4. Uisce Éireann and local authorities to work with landowners to eliminate exceedances of pesticide standards in drinking water supplies across supplies showing signs of pesticide impacts.
5. Preventing instream habitat damage arising from land drainage and river channel drainage.
6. Support voluntary efforts to rewet 20,000 hectares of organic soil to deliver water, climate and biodiversity benefits.
7. Protecting and restoring valuable and sensitive high-status water catchments.

Achieving these goals will require new stricter requirements and regulations, and increased compliance with existing environmental regulations, including the GAP Regulations. This will require not only increased knowledge and understanding of the requirements but also increased enforcement of the requirements, particularly Goals 1 (Agricultural Nitrate losses), 2 (land and river drainage) and 3 (point source pollution from farms).

Reducing the loss of nitrogen to the environment will require tighter regulation of nitrogen fertiliser and slurry inputs to agricultural systems.

In response to these significant pressures, the Programme of Measures includes a specific focus on diffuse nutrient pollution, and in agriculture on: (1) a stronger and more targeted Nitrates Action Programme including undertaking an interim review in 2023 and additional measures to be implemented in 2024; (2) more targeted, data-driven enforcement with more resources; (3) adopting a CAP Strategic Plan with green architecture including funding for on-farm measures; (4) building the capacity of farmers to adopt nutrient-efficient farming techniques and (5) communication of best practices including the outcomes of the Agricultural Catchment Project research outcomes by publications, ACP Open Days, webinars and farm talks.

In addition to specific measures, the **Teagasc Signpost Programme** is showcasing demonstration farms that are leading the transition of Irish Farming. While broad in scope, it represents a move towards a more sustainable model of farming and includes the aim of improving water quality, improving biodiversity and reducing greenhouse case emissions while also maintaining and improving business margins.

Environmental regulation of the farming sector: Compliance and enforcement

The Fifth Nitrates Action Programme includes very significantly stronger measures to address nutrient losses, including:

- A livestock excretion banding system is in place from 2023. This may potentially result in some farmers reducing their stocking rate to better reflect current animal emissions;
- The annual maximum fertilisation rate of nitrogen on grassland has been reduced by 10% with potential for a further reduction of, at least, 5% in 2024 based on the outcome of the NAP interim review in 2023.
- A national chemical fertiliser sales database for farmers has been established and legislation was put in place during 2023;
- A stronger emphasis on risk based inspections and enforcement.
- Tighter controls on the application of chemical fertilisers and slurry, including extending the closed period where application to land is prohibited;
- Reduction of the derogation stocking rate maximum of 250 kg N/ha to 220 kg N/ha on farms in water bodies where the water quality assessment component of the NAP interim review indicates water quality deterioration or risk of deterioration from nutrients.

Local authorities undertook a review of their resource needs within their water environmental functions, including enforcement activities. This review highlighted that 57 more staff were required to undertake agricultural inspections and enforcement under the GAP regulations. This plan has committed to increasing local authority resources by allocating

funding for these 57 staff for the National Agricultural Inspection Programme, with all staff to be in place by Q4 2024. In conjunction with this, a central data system will be established to collate all inspections and enforcement data to inform the development of future measures under the NAP.

The Department of Agriculture, Food and the Marine (DAFM) have increased their derogation inspections from 5% to 10% of all derogation farms per year plus DAFM will undertake 500-1,000 rapid inspections per annum in Q1 of each year, when risk to water quality is considered high. Non-compliance will result in penalties on the basic payment and DAFM will cross-report to local authorities. This allows local authorities to undertake follow-up inspections and enforcement action.

To support the goal of targeting the right measure in the right place all farm inspectors will be provided with the appropriate level of catchment science training to ensure that inspections are sufficiently targeted

Major behavioural change programme around slurry storage

Reducing the loss of nitrogen to the environment will require tighter regulation of nitrogen fertiliser inputs to agricultural systems, including strict adherence to slurry storage requirements. The penalties and environmental enforcement will not be adequate on their own to address all of the objectives listed above. There is a need for continued and improved engagement and support of farmers if a sustainable agricultural model is to be fully established and endure at a national scale, supported by a suitable enforcement programme.

Under the Nitrates Action Programme (NAP), Dairy Sustainability Ireland is working with Co-ops and farmers to drive nitrogen reductions at both national and catchment scales with the main focus on:

- Driving improvements in slurry management,
- Promoting compliance with GAP regulations requirements,
- Change Management Strategy to drive N reductions,
- Communications/knowledge transfer programme, linked to ASSAP,
- Major behavioural change programme around slurry storage.

Reduced limits on the total inputs of slurry and chemical nitrogen fertiliser will stimulate and encourage the use of more efficient and precision use of nutrients on farms. The CAP Strategic Plan and the new Green Architecture will provide opportunities to promote the uptake of such alternatives.

Common Agricultural Policy Strategic Plan – voluntary measures supporting environmental water objectives

The Common Agricultural Policy Strategic Plan Regulations 2115/2021 took effect from the 1st January 2023 until 2027. This is the EU instrument that sets the rules for Member State Common Agricultural Policy (CAP) strategic plans, which are financed in part by the European Agricultural Guarantee Fund (EAGF) and by the European Agricultural Fund for Rural Development (EAFRD). This sets the standard for good agricultural and environmental condition of land (known as GAEC).

Ireland's CAP Strategic Plan (CSP), which came into effect in January 2023, has a strong emphasis on the achievement of a higher level of climate and environmental ambition and contains measures that aim to improve biodiversity and water quality. More specifically, it outlines how it contributes to CAP objectives at EU level and additional environmental objectives under the Water Framework Directive, as set out in national policies, including the national River Basin Management Plan (**See Box 3**).

While there is significant work ahead to design the delivery framework for the Green Architecture, DHLGH continues to promote the following high level principles in discussions with the Department of Agriculture, Food and the Marine.

During negotiations on the CAP Strategic Plan efforts were focussed on ensuring that the full range of instruments available under the new Green Architecture should be used in a coherent way to contribute to the range of water quality objectives identified (as well as biodiversity and climate objectives). Principles included:

- Priority will be given to measures that achieve multiple environmental co-benefits, where possible.
- The most appropriate instruments will be matched to each water quality objective.
- Build on the successes of the previous CAP. There are lessons are to be learned and applied

at a local and a national scale from GLAS and the EIPs.

- Capitalise on the existing river basin management governance and implementation structures (e.g. Regional Operational Committees, LAWPRO and ASSAP) to support the effective implementation of the Green Architecture measures at regional and local level.
- Continue to strengthen the collaborative approach undertaken to date involving a wide range of state bodies and other stakeholders.
- Measures will be targeted based on scientific evidence. In particular, risk maps, termed Pollution Impact Potential (PIP) maps published by the EPA should be used to guide the 'right measures in the right place'.
- The national Farm Advisory Service is recognised as essential to underpinning the successful implementation of all aspects of the new Green Architecture and will be used to maximum effect. To support the goal of targeting the right measure in the right place all farm advisers involved in Environmental Schemes including the ACRES Cooperation Projects and Water EIP, will be provided with the appropriate level of catchment science training to ensure that measures are sufficiently targeted.
- Farm advisers will be made aware of the various other relevant funding schemes available to farmers to support the right measure in the right place.

Box 3: Common Agricultural Policy Strategic Plan

Common Agricultural Policy Strategic Plan

CAP Strategic Plan

New Rural Development Programme Regulations under the National CAP Strategic Plan will underpin the establishment of a new green architecture that aims to deliver and reward positive environmental outcomes, including water, biodiversity and climate mitigation and adaptation objectives.

The Department of Agriculture, Food and the Marine has collaborated with the Department of Housing, Local Government and Heritage (Water and Heritage Divisions), the EPA and LAWPRO to design schemes under Pillars I and II of the CAP Strategic Plan (2023-2027) which will deliver benefits for water protection, restoration and biodiversity, as well as climate mitigation and adaptation.

Agricultural Sector Action Work Plan

DAFM will develop a Sectoral Action Work Plan setting out details of planned water protection and mitigation actions under the CAP Strategic Plan at catchment level. This will support the preparation of Catchment Management Work Plans led by LAWPRO as well as fulfilling the monitoring and assessment commitments under the CAP Strategic Plan SEA and AA.

Data sharing

DAFM, DHLGH, the EPA and local authorities recognise the importance of data sharing in order to effectively monitor and assess the environmental impacts of all CSP measures at field level. Both departments and authorities commit, in principle, to fully facilitating and maximising data sharing of environmental and relevant CSP data between authorities to support this goal, while bearing in mind the GDPR Regulations.

Evaluation

Ireland is committed to a comprehensive monitoring and evaluation plan as the CSP is rolled out. The impact of the CSP intervention (referenced below) on water quality will be considered and assessed as part of an integrated evaluation of the green architecture - a process and plan which will be carried out collaboratively with a range of relevant stakeholders.

Eco-scheme

The aim of this intervention is to reward farmers for undertaking actions beneficial to the climate, environment, water quality and biodiversity. It is anticipated that up to 110,000 farmers will avail of this measure. The committed budget is €1.48 billion.

The new measures include:

1. Space for Nature
2. Extensive Livestock Production
3. Limiting Chemical Nitrogen Usage
4. Planting of Native Trees and hedges
5. Use of a GPS-controlled fertiliser spreader or GPS controlled sprayer
6. Soil Sampling and Appropriate Liming on all eligible hectares.
7. Planting of a break crop(s)
8. Sowing of a Multi Species Sward

Each of the eight Eco-scheme measures have the potential to contribute to the protection of water quality, to varying degrees. In particular, Measures 1 and 4, if sufficiently targeted, can reduce the risk of pollution runoff at field level.

DAFM will promote and target the uptake of these measures in locations at farm level where they will maximise water protection. This will be achieved through training and farm advisory services and by using the Pollution Impact Potential (PIP) maps generated by the EPA.

Agri-Climate Rural Environment Scheme (ACRES)

Two approaches were designed for the ACRES. The total committed budget is €1.5 Billion including support for Co-operation teams. The two approaches are;

ACRES Co-operation Projects (€740 million) are available to 20,000 farmers in defined high priority geographical areas, including high status objective water bodies. The habitat quality of participating farms will be scored, taking into account risks to water quality. Participants will undertake bespoke farm, landscape and catchment measures, including targeted measures, aimed at improving water protection and biodiversity. Payments will be made for the delivery of positive environmental outcomes through a Results Based Payment Approach and by financial supports for non-productive and landscape actions undertaken satisfactorily.

ACRES General (€750 million) is available nationally for up to 30,000 farmers (outside of the high priority geographical area as defined for the ACRES Co-operation Project approach described above). It offers a range of measures, including measures aimed at improving habitat quality and water protection (both targeted and general). ACRES General is structured in Tiers with certain criteria determining whether a farmer is eligible to apply for Tier 1 (which includes high status catchments) or Tier 2 (which includes vulnerable water bodies); the principle being that those who qualify for Tier 1 will get priority access to the Scheme over those in Tier 2, while those who qualify under Tier 2 will in turn get priority access over those whose application comprise solely of Tier 3 General actions.

National Pollutant Impact Potential (PIP) maps generated by the EPA for Nitrogen (N) and Phosphorus (P) will be used to show the highest risk areas in the landscape for losses of N and P to waters. This information will be used to aid the selection of actions to protect highest priority habitats and address areas of highest risk to water quality.

The objectives of the new CAP include climate, animal welfare, water, soil, animal and plant health and biodiversity. These will be delivered through the new Green Architecture. The components will consist of; Enhanced Conditionality, annual Eco-schemes and multi-annual Agri-Environment Climate Measures, which will be delivered through the new Agri-Climate Rural Environment Scheme (ACRES).

ACRES has capacity to support up to 50,000 farmers in implementing measures. However, it is estimated that there may be up to 60,000 additional farmers in other Areas for Action covering 13,000km^2 in need of targeted agricultural measures for the purpose of protecting and restoring water quality. There is a significant proportion of farmers within this group which may be having a significant impact on water quality but do not tend to participate in voluntary Agri-environmental schemes for various reasons. For this reason, the Department of Agriculture, Food and the Marine in collaboration with the Department of Housing, Local Government and Heritage has commissioned a national large-scale European Innovation Partnership (EIP) project ('Farming for Water') focussed on water to address this gap, thereby supporting the RBMP. The overall value is €60milllion over five years (2023-2027). €50million is intended to provide funding support to farmers for implementing supplementary measures going beyond compliance **(See Box 4)**. The project will aim to support up to 15,000 farmers in implementing on-farm water protection and mitigation measures.

The challenge for the Water EIP will be to target, encourage and support these farmers to address the key risks to water quality on their farms. The proposed Water EIP provides a valuable opportunity to complement actions under the new Nitrates Action Programme and ACRES thereby addressing a critical gap in measures to protect and restore water quality in River Basin Management Plan Areas for Action nationally. In total, 517 Areas for Action have been selected for focused attention in the third-cycle.

Box 4: Water European Innovation Partnership (EIP) project (2023-2027)

Water European Innovation Partnership (EIP) project (2023-2027)

The Department of Agriculture, Food and the Marine (DAFM) invited applications for funding in the sixth competitive call for proposals under the European Innovation Partnerships Initiative. The call was specifically focused on reducing losses of phosphorus, nitrogen, sediment and, where relevant, pesticides to water from agricultural lands by promoting the adoption of innovative best practice in nutrient management, the application of Nature-based Natural Water Retention Measures (NWRM) and other suitable measures. The application of measures will be guided by the Pollution Impact Potential Maps recently developed by the Environmental Protection Agency, thereby applying the principle of putting 'the right measure in the right place' at field level.

This Call sought proposals for the development and implementation of one single EIP with national coverage, targeting water protection and restoration actions on lands under agricultural management within River Basin Management Plan Areas for Action. The EIP aims to engage with farmers to develop and implement sustainable land management options for farms at catchment level which will meet some or all the following objectives:

- Identify the key risks to water quality at field level. This may be guided by the best available scientific evidence, including the Pollution Impact Potential Maps developed by the Environmental Protection Agency (EPA),
- Reduce the risk of phosphorus, nitrogen, sediment and, where relevant, pesticide losses to water from agricultural lands by promoting and incentivising the adoption of innovative best practice in nutrient management, the application of Nature-based Natural Water Retention Measures (NWRM) and other suitable measures.
- Guide the location of measures at field level using the best available scientific evidence, thereby applying the principle of the putting 'the right measure in the right place'. The EPA Pollution Impact Potential Maps may be used as a guide for this purpose.
- Maximise other ecosystem service co-benefits such as the protection of biodiversity, flood attenuation and addressing climate change.
- Contribute to building resilience to the impacts of climate change at catchment/landscape level.

In July 2023 the Minister for Agriculture, Food and the Marine announced that the project had been awarded to a partnership between LAWPRO (acting on behalf of all local authorities), Teagasc and Dairy Industries Ireland. The project will aim to support up to 15,000 farmers in implementing on-farm water protection and mitigation measures.

Actions contributing to a stronger and more targeted Nitrates Action Programme

Agri 1: DHLGH and DAFM will oversee the implementation of the *stronger and more targeted Nitrates Action Programme.* The Fifth Nitrates Action Programme (2022-2025) retains and strengthens the existing controls from agricultural nutrient impacts on water and will implement tighter controls on nitrogen and phosphorus inputs by:

1. Stipulating tighter controls on the timing and methods of application of chemical nitrogen fertilisers and slurry. [Timeframe – In place]
2. Reducing the annual maximum fertilisation rate of nitrogen on grassland by 10% in 2022 with potential for a further reduction of, at least, 5% in 2024 following the Interim Review in 2023 [Timeframe 2024]
3. Reduction in the maximum derogation stocking rate on farms in water bodies where there is, or a risk of, declining water quality [Timeframe 2024]
4. Implementing a livestock excretion banding system from Q1 2023 to more accurately reflect the different rates of organic nitrogen loading from different sized animals in the maximum stocking rate calculations [Timeframe 2023]
5. Establishing a national fertiliser sales database for farmers [Timeframe 2023]

Agri 2: Local Authorities will *strengthen the inspection and enforcement relating to agricultural diffuse pollution.* A total of 57 new Inspectors in local authorities have been allocated for the National Agricultural Inspection Programme (NAIP) and five new staff

have been allocated to the EPA to oversee the programme. An additional four staff have been allocated to LAWPRO to help in co-ordinating the activity and avoiding duplication where possible. Inspections will be targeted and risk-based using all the available evidence, including water quality data, the EPA's PIP Maps and the Targeting Agricultural Measures Map on up to 4,500 farms per annum during the lifetime of the Nitrate Action Programme. DAFM will undertake 500-1,000 inspections per year under the GAP Regulations focused in Q1 where risk of nutrient impact on water quality is high. DAFM has increased their derogation inspections from 5% to 10% of all derogation farms per year and will undertake approximately 700 inspections per annum. [Timeframe 2022 - 2024]

Measures in Ireland's CAP Strategic Plan contributing towards water quality

Agri 3: DAFM will implement Ireland's CAP Strategic Plan with a strong emphasis on the achievement of a higher level of environmental ambition. This includes implementing the new Green Architecture of (1) Conditionality, (2) Pillar I Eco-Schemes and (3) the Pillar II Interventions such as ACRES and the new Water EIP. [Timeframe 2023 - 2027]

Agri 4: Eco-scheme measures will contribute to the protection of water quality. DAFM will promote and target the uptake of these measures in locations at farm level where they will maximise water protection. This will be achieved through training and farm advisory services and by using the Pollution Impact Potential (PIP) maps generated by the EPA.

Agri 5: The Water EIP project led by LAWPRO, in partnership with Teagasc and Dairy Industries Ireland will focus on reducing losses of phosphorus, nitrogen, sediment and, where relevant, pesticides to water from agricultural lands by promoting the adoption of innovative best practice in nutrient management, the application of Nature-based Solutions and other suitable measures. The project will aim to support up to 15,000 farmers in implementing on-farm water protection and mitigation measures.

Additional Measures

Agri 6: DHLGH and DAFM will put arrangements in place to ensure independent assessments and reviews of the efficacy of the Nitrates Action Programme (NAP), the CAP Strategic Plan and the Water EIP (and other relevant measures) to bring the 1,000 water bodies impacted by agriculture up to good status and to prevent deterioration. They will identify additional measures, where necessary, which will be implemented during the lifetime of the plan or beyond, where justified under Article 4 of the WFD. Mechanisms for review will include; DHLGH monitoring & assessment of progress with the programme of measures, EPA's statutory role in assessing the NAP, EPA research projects and the CAP Strategic Plan Performance Monitoring and Evaluation Framework (PMEF) [Timeframe; Ongoing, Q4 2025 for mid-term review]

Agri 7: In support of the Catchment Management Work Plans, the Department of Agriculture, Food and the Marine will publish a Sectoral Action Work Plan to reduce nitrogen losses to water in areas where levels are increasing or are too high, and to bring nitrogen, phosphorous and sediment losses to water from agricultural sources within sustainable levels by 2027.

The Sectoral Action Work Plan for Agriculture will include targeted measures to address the 1,000 water bodies at risk from agriculture during the third-cycle, along with protection measures needed to prevent further deterioration. The aim of the plan will be a rapid graduated reduction of nitrogen, phosphorous and sediment losses to water bodies with a target to reach sustainable use and discharges in all catchments of concern by 2027. [Timeframe 2024]

Agri 8: *Online Farm Sustainability Planning*: Teagasc will develop an online Farm Sustainability Plan for farmers complementing existing Nutrient Management Planning online tool to support the wider Agricultural Knowledge and Information Systems (AKIS) programme. [Timeframe 2024]

Agri 9: *Extend and expand the local authorities' water protection office.* LAWPRO will be extended for the full duration of Cycle 3 up to 2027. The CCMA will identify the appropriate level of resources and involvement of LAWPRO to meet WFD objectives up to 2027 and beyond in future RBMPs.

Agri 10: *Provide free on-farm advice to farmers.* The sustainability advisory service (ASSAP) will be extended for the full duration of Cycle 3. The dairy industry has increased the number of advisors involved in ASSAP by six for the period 2022 to 2027.

Agri 11: To support the goal of targeting the right measure in the right place all farm advisers involved in the 'Farming for Water' Agri-EIP, will be provided with ongoing professional development, including an appropriate level of catchment science training to ensure that measures are sufficiently targeted.

In addition, these farm advisers will be made aware of the various other relevant funding schemes available to farmers to support the right measure in the right place.

Agri 12: Upskill farmers and advisors to ensure they have the knowledge and tools to implement appropriate measures to reduce the impact on water quality from farming practices..

2. Physical modifications to the flow, form and/or function of natural surface water bodies (Pressures on Hydromorphology)

Restoring the natural functions of water bodies

This section deals with removing existing obsolete barriers, remediating retained structures and preventing further impacts on hydromorphological conditions of water bodies. Sedimentation and other sector-specific impacts on hydromorphology are dealt with under sectoral headings (agriculture etc).

Hydromorphology concerns the flow, form or function of natural surface water bodies or the physical condition of water bodies. Impact on hydromorphology is determined by how much the flow, form or function of the water body has been altered from 'natural' undisturbed conditions. While all water bodies show some element of disturbance, where this is significant it will influence the ecological status of that water body under the Water Framework Directive[1].

Both the Water Framework Directive (WFD) and the Habitats Directives require Ireland to look at a surface water body's ecological quality and potential. Part of this is the 'hydromorphology' – the shape and flow of the water body. Dams, weirs, culverts, ramps and diversions can all impact negatively on the benefits that rivers and lakes provide. Flood control, fish and other biodiversity may all be negatively affected by changes to the physical condition of water bodies.

Ireland has obligations under the WFD and the Habitats Directive to manage the physical condition of all natural and artificial waters in order to protect and improve their status. Overall, pressures on hydromorphology are the second most significant category of pressures on these waters. They impact by causing damage to natural processes and to the structure and functions of habitats and species, e.g. barriers that impede fish migration, land and channel drainage that alters the physical habitat conditions and the flow conditions. These physical alterations are frequently linked to other significant pressures such as agriculture, forestry, peat extraction, mines and quarries.

Hydromorphology has been identified as a significant pressure impacting **448** water bodies *'At Risk'* of failing to achieve their WFD objectives. The breakdown of activities altering the physical habitat include: channelisation (296); land drainage[2] (78); dams, barriers, locks and weirs[3] (66); river bank erosion (31); embankments (31); overgrazing (18); and culverts (4). Morphological impacts[4] (i.e. altering physical habitat such as the bed, bank, riparian zone or natural sediment conditions) have been identified within the majority of these 448 *'At Risk'* water bodies (~99%), whereas hydrological impacts (i.e. changes to flow conditions) have been identified in 30% of these water bodies.

Controls on pressures that affect the physical condition of waters need to be strengthened in

1 It should be noted that under Annex V of the Water Framework Directive, the quality elements for the classification of ecological status for surface waters includes, 'hydromorphological elements supporting the biological elements'. This includes, inter alia, connection to groundwater bodies as part of hydrological regime for rivers and lakes. Hydromorphology is not specifically mentioned in relation to groundwater status under Annex V; however, it is stated in the definition of quantitative status that the level of groundwater must not be subject to anthropogenic alterations that would result in the failure either to achieve environmental objectives for surface water or cause significant diminution of the status of surface waters.

2 Note: channelisation and land drainage encompass drainage schemes, private in-channel drainage works and indirect impacts from land reclamation and field drainage.

3 This number is likely to be underestimated, as the assessment does not yet incorporate output from the national barrier inventory, which is in development. Current figure based on expert judgement through engagement in stakeholder workshops.

4 Note: morphological impacts also includes impacts from fine sediment.

Ireland. In anticipation, preparatory technical work has been underway during the second RBMP cycle. Scientific evidence is also available from technical work undertaken for habitats and species protected under the Nature Directives. These recent technical advances mean that a comprehensive, robust and streamlined management regime can now be developed and implemented. There is a significant body of work ahead in delivering a new comprehensive and robust management framework for pressures on hydromorphology on water. For this reason a new National Hydromorphology Programme is being established (**See Box 5**)

Regulating activities impacting on water bodies

A key element of protecting and restoring the hydromorphological elements of water bodies will be to develop an enhanced regulatory regime for activities likely to impact on water bodies' physical attributes (**see Box 6**). The new regulatory regime will deliver multiple benefits for water, nature and biodiversity, and climate mitigation and adaptation. The existing body of legislation in the water services and water management sector, governing activities impacting on the physical condition of water, cannot be easily amended to deliver a robust regulatory

Box 5: National Hydromorphology Programme

National Hydromorphology Programme

The Minister for Housing, Local Government and Heritage is establishing a National Hydromorphology Programme. The Programme will be supported by a Hydromorphology Expert Group and is intended to facilitate the implementation of Water Framework Directive (WFD) objectives relating to the control of pressures on hydromorphology. The Programme will be supported by an Expert Group.

The Expert Group will report directly to the Water Policy Advisory Committee (WPAC). The initial focus of the Expert Group will be on:

- Scoping the optimum environmental management framework for activities posing a risk to the hydromorphological conditions of water bodies;
- Advising the Minister on policy and legislative needs required to give full effect to the provisions of Article 11(3)(i) of the Water Framework Directive;
- Assisting in the preparation of a work programme and associated timelines for the delivery of (1) a new regulatory framework for the protection of waters from pressures on hydromorphology (physical impacts), and (2) the establishment of a restoration programme;
- Advising on the establishment of a National Restoration Programme to mitigate the impacts of existing pressures on hydromorphology in or near water bodies, thereby responding to the WFD requirement to restore status.

Sub-actions for the purpose of progressing and informing the development of the national restoration programme shall include overseeing (1) the implementation of the Lower River Shannon Roadmap (see associated action in Programme of Measures for further details) and (2) the proposed pilot project to mitigate the Annacotty Weir on the Mulkear River in County Limerick (see associated action in Programme of Measures for further details).

Whilst a new comprehensive environmental management framework is developed for activities posing a risk to the hydromorphological condition of water bodies, the Expert Group will:

- Serve as a forum for information and best practice exchange between organisations with a role in managing pressures on hydromorphology.
- Identify interim solutions which can be readily implemented during the third RBMP cycle to assist in managing pressures on hydromorphology.
- Once established, the National Hydromorphology Expert Group should set the identification of interim measures as a priority.

Interim measures identified by the Expert Group should form the basis for targeted measures to address pressures on hydromorphology in an update to the Catchment Management Work Plans.

regime. The existing body of legislation is dispersed across several regulatory and legislative areas, it is complicated and has already been heavily amended. As such, it requires considerable cross-referencing and skill to navigate. Therefore, it will be necessary to develop new consolidated legislation, including the development of a Bill and associated secondary legislation aimed at better regulating pressures on hydromorphology. This will also require a number of repeals or amendments to existing pieces of legislation across a number of policy areas.

The scope of the proposed new legislation and regulatory regime will include reaching across a number of relevant policy areas overseen by:

- the Department of Finance/OPW;
- Department of Environment, Climate and Communications;
- Department of Agriculture, Food and the Marine; and
- the Water, Planning and Heritage Divisions within the Department of Housing, Local Government and Heritage.

Box 6: DHLGH to lead in the development of a new regulatory regime in collaboration with other departments and public bodies to address pressures on the physical condition of waters.

DHLGH to lead in the development of a new regulatory regime in collaboration with other departments and public bodies to address pressures on the physical condition of waters.

The National Hydromorphology Programme will deliver multiple benefits for water, biodiversity and climate mitigation and adaptation. To achieve these benefits, a programme is proposed to deliver a new consolidated piece of legislation that will control physical changes in or near water that have a potential to impact on the status of water, thus preventing the achievement of Water Framework Directive objectives. It is anticipated that this will require new legislation, including a Bill and associated secondary legislation aimed at managing pressures on hydromorphology to ensure that bodies of water will achieve the required ecological status or potential as required under the Water Framework Directive.

The National Hydromorphology Programme is directly relevant to the statutory functions and responsibilities of a number of government departments. This will require new legislation, including a Bill and associated secondary legislation aimed at managing pressures on hydromorphology. It is also anticipated that there will be a need to amend and/or repeal a number of existing pieces of legislation. This will require coordinated effort across departments over the coming years to address several legacy issues that each department has been seeking to resolve. The following key pieces of legislation are likely to be amended (among others):

- Planning and Development Act (2000)
- Planning and Development Regulations (2001)
- The Arterial Drainage Acts (1945 and 1995) *
- The Local Authorities (Works) Act (1949)
- EIA (Agriculture) Regulations (2011)
- Fisheries Act (1959)
- Foreshore Act (1933)

**The Government has mandated a national Land Use Review which will trigger a review of future drainage needs and practices carried out under the Arterial Drainage Act. The review is led jointly by the Department of Environment, Climate and Communications, the Department of Agriculture, Food and the Marine and the Department of Housing, Local Government and Heritage.*

The regime will also require the design of a new administrative system. The operation of the new regime may be assigned to one or more competent authorities, depending on the nature and scale of the new laws. Codes of Practice and / or General Binding Rules (GBRs) will also need to be developed to support the new regime. This will build on the most up-to-date technical knowledge and expertise available, from work progressed under the WFD and Nature Directives, and it will require input and engagement with a wide range of stakeholders.

Restoration Programme

It is also proposed to establish a long-term restoration programme to mitigate the negative impact of past construction and activities in or near water bodies on the condition of those water bodies **(See Box 7).** It is proposed that the initial focus will be on the removal and/or modification of problem barriers on rivers, but it will be extended as other impacts and priorities are identified.

Of the approximately 73,000 barriers identified nationally by IFI, 2,000-7,000 will likely require mitigation. The third-cycle RBMP aims to initially mitigate approximately 5% (270) of the 2,000-7,000 problem barriers. However, the exact number will be determined after more detailed local investigations. Restoration targets for water-dependent habitats and species listed in the Nature Directives, which have been adversely affected by pressures on hydromorphology, will also need to be considered as part of any restoration programme. In relation to its implementation, potential roles for the IFI, NPWS, OPW and Local Authorities may be appropriate. For instance, IFI already operates an annual Habitats and Conservation Scheme. Since 2016, a value in excess of €6,000,000 has been awarded by IFI to over 250 projects nationally. In 2021 there were 17 projects in 11 counties across the country in line for funding worth an overall €774,000. The Habitats and Conservation Funding Call for 2023 has been activated by IFI, and funding is available to IFI and eligible third parties throughout the Republic of Ireland to support sustainable fisheries habitats and conservation.

Box 7: Establishment of a restoration programme to mitigate the negative impact of past construction in or near water bodies.

Establishment of a national River Barriers Mitigation Programme to mitigate the negative impact of past construction in or near water bodies.

A new national restoration/mitigation programme will be established from 2023.

Inland Fisheries Ireland will establish a newly resourced Barriers Mitigation Division from 2023.

The programme will be overseen by the new National Hydromorphology Expert Group.

The initial focus will be on barriers but will expand to other pressures on hydromorphology following scoping by the new National Hydromorphology Expert Group. (**Note:** Other pressures may include drainage. However, drainage policy needs to be reviewed beforehand. This will happen in the context of the national Land Use Review currently underway. It is led by the Department of Environment, Climate and Communications (DECC), the Department of Agriculture, Food and the Marine (DAFM) and the Department of Housing, Local Government and Heritage (DHLGH)).

A minimum of 5% of problem barriers (approximately 257) will be removed or modified during the cycle (2023-2027).

Detailed planning and prioritisation of barrier removal/mitigation will be led by IFI at catchment level during 2023-2024 as part of the preparation of Catchment Management Work Plans led by LAWPRO. IFI will develop and implement a supporting restoration/mitigation programme.

Effective monitoring before and after restoration/mitigation will be undertaken.

DHLGH / DECC have jointly prepared a Memorandum to Government seeking approval for capital funding for the programme, once designed. A minimum investment of €110 million is anticipated.

A number of proposed pilot barrier mitigation projects are currently being progressed to trial methods for dealing with different implementation challenges. These initial pilot projects will inform the wider barriers restoration/mitigation sub-programme. It is proposed that IFI will lead a multi-agency with the aim of examining the feasibility of opening up these catchments to migratory fish species by mitigating these significant barriers and progressing to the next stage, as appropriate;

Pilot project	Catchment	Objective
Ardnacrusha Parteen Hydroelectric Scheme	Shannon River, Co. Clare	The proposed pilot project will use state-of-the-art technical solutions to improve fish passage through the largest hydroelectric scheme in Ireland based on the approved Roadmap.
Dodder catchment scale multiple barrier mitigation	Dodder River, Co. Wicklow and Dublin	This proposed pilot project will aim to open up this heavily urbanised catchment to migratory fish species by mitigating the five most significant barriers in the lower reaches.
Annacotty Weir fish passage mitigation	Mulkear River, Co. Limerick	The pilot project will provide an opportunity to test a collaborative and ecology focussed design approach. The pilot will also test enhanced community engagement opportunities that go beyond the standard consultation practices involved in the planning process.
Clohamon Weir fish passage mitigation	Slaney River, Co. Wexford	This proposed pilot project will aim to improve fish passage at a medium scale hydroelectric scheme through a state and community collaborative initiative.

Pilot project on public engagement in barrier remediation – Annacotty Weir

To assist with the design and implementation of the national restoration programme, a pilot project is currently being undertaken for Annacotty Weir in the Mulkear catchment, County Limerick. Annacotty Weir has been identified by IFI as a priority for mitigation works and feasibility studies are currently underway to identify the preferred option for mitigation of the weir. It has significant potential to benefit both anadromous fish (e.g. salmon) and resident fish populations if measures to improve fish passage and river connectivity are undertaken. The pilot will provide an opportunity to test a collaborative and ecology focussed design approach. It will involve a multi-disciplinary panel of experts from the early stages of the decision-making process. The approach will inform similar future mitigation projects undertaken as part of the national restoration programme. The pilot will also test enhanced community engagement opportunities that go beyond the standard consultation practices involved in the planning process. It is anticipated that barrier mitigation works at Annacotty Weir will be competed in 2025, which will include the establishment of measures for the documentation of improved hydromorphology outcomes.

Pilot large barrier remediation - Implementation of the roadmap of actions to improve fish migration in the Lower River Shannon

A key objective of the second RBMP was the development of a plan to improve fish migration at Parteen and Ardnacrusha in the Lower River Shannon. To this end, the then Minister for Housing, Planning and Local Government established in 2018 a multi-agency steering group to prepare recommendations for improvements to fish passage in the Lower Shannon catchment. The collective efforts and cooperation amongst the steering group has now resulted in the development of a draft roadmap of actions, which received Ministerial Approval in 2022. This ambitious and innovative roadmap sets out a programme of initial investment measures which will make a significant improvement to free passage for fish at Ardnacrusha and Parteen Weir in the short-term, while providing the platform for long-term enhancement of the ecology and environment of the Lower Shannon and consequently, the environmental sustainability of the Shannon Hydro-Electric Scheme. The roadmap will be implemented during the third RBMP cycle (**See Box 8**), commencing in early-2023. This will include a number of feasibility studies to assess the potential options for both up and downstream fish passage, an environmental flow 'Eflow' regime and a management plan for the Lower River Shannon. Improving fish passage at Parteen will contribute very significantly towards WFD and Habitats Directive objectives as well as targets in the EU Biodiversity Strategy for restoring rivers to a free-flowing state across the European Union.

Box 8: Implementation of the roadmap of actions to improve fish migration in the Lower River Shannon at the Hydroelectric scheme located at Parteen Basin and Ardnacrusha.

Implementation of the roadmap of actions to improve fish migration in the Lower River Shannon at the Hydroelectric scheme located at Parteen Basin and Ardnacrusha.

An ambitious roadmap has been prepared outlining an initial phase of investment to implement measures which will make a significant improvement to free passage for fish at Ardnacrusha/Parteen on the Lower River Shannon in the short-term. It will also provide a platform for long-term enhancement of the ecology and environment of the Lower River Shannon and consequently the environmental sustainability of the Shannon Hydro-Electric Scheme. The facilitation of fish passage at Parteen Weir will be one of two key projects that will be addressed by the new National Hydromorphology Programme. The project is being co-financed by the ESB and the Department of Housing, Local Government and Heritage.

The Minister for Housing, Local Government and Heritage has accepted the Roadmap recommended by the Working Group and has approved its implementation. An initial, provisional budget of €10 million has been approved and the following steps are underway;

Completion of the following tasks:

- Design and build a new fish pass at Parteen Weir (subject to the outcomes of Tasks 2 to 6 supporting this option), completed by end-2027.
- An "Eflow" (environmental flows) study programme agreed and instigated during 2024, completed by end-2026.
- A Tailrace Barrier Feasibility Study (where Ardnacrusha tailrace meets the River Shannon) with recommendations completed by end-2025.
- A downstream Fish Passage Feasibility Study with recommendations completed by end-2025.
- A new Fish Pass Feasibility Study at Ardnacrusha with recommendations completed by end-2025.
- A Lower Shannon Management Plan to be agreed (subject to a period of public consultation) by end-2025.
- Continuation of the project Working Group to oversee implementation of the roadmap.
- Procurement of expert consultancy support to project manage the implementation of the roadmap under the guidance of the Steering Group in 2024.
- The Working Group for the improvement of fish passage at Parteen Weir has reconvened as the project moves to the phase of detailed design and supporting feasibility studies prior to construction. This group will be overseen by an independent chairperson. The procurement process is underway to appoint a consultant to carry out the steps of the roadmap and the appointed consultant will work with the Working Group to identify the most suitable combination of solutions following the detailed feasibility studies.

Hymo 1: A Hydromorphology Expert Group will be established to support the new National Hydromorphology Programme. This Expert Group will identify interim measures, which will be readily implemented during the third RBMP cycle to assist in removing pressures on hydromorphology. [Timeframe commencing 2024].

Hymo 2: DHLGH will lead the development of a new enhanced and consolidated legislative regime to address pressures on the physical condition of waters. [Timeframe 2026].

Hymo 3: IFI will establish a restoration programme to mitigate the negative impact of past construction in or near waterbodies. [Timeframe Q1 2024].

Hymo 4: A Sectoral Action Work Plan for Hydromorphology will be developed, which will include measures and plans to address the 448 water bodies at risk from pressures on hydromorphology, including barriers, channelization, drainage, sediment and flood protection. It will be led and coordinated by DHLGH with supporting bodies IFI, DAFM, Forestry, OPW and DECC. [Timeframe Q4 2024].

Hymo 5: It is proposed that IFI will lead a multi-agency whole of catchment pilot project on the River Dodder from source to sea with the aim of examining the feasibility of opening up this heavily urbanised catchment to migratory fish species by mitigating the five most significant barriers in the lower reaches and progressing to the next stage, as appropriate. [Timeframe 2024 to 2027].

Hymo 6: IFI will lead a pilot project to be undertaken for the Annacotty Weir in County Limerick. The project will provide an opportunity to test a collaborative and ecology focussed design approach. It will also test enhanced community engagement opportunities that go beyond the standard consultation practices involved in the planning process, thereby assisting with the design and implementation of the national restoration programme. The pilot project is initially examining the feasibility of mitigation and will progress to the next stages, as appropriate. [Timeframe 2022 - 2025].

Hymo 7: Implementation of the roadmap of actions, including the use of state-of-the-art technical solutions, to improve fish migration in the lower Shannon at the Hydroelectric scheme located around Parteen and Ardnacrusha. The pilot project will initially examine the feasibility of mitigation and will progress to the next stages, as appropriate. [Timeframe 2024 - 2027].

Hymo 8: A proposed pilot project on the Slaney River at Clohamon will aim to improve fish passage at a medium scale hydroelectric scheme through a state and community collaborative initiative. The pilot project will initially examine the feasibility of mitigation and will progress to the next stages, as appropriate. [Timeframe 2024 - 2027].

Hymo 9: In addition to river barrier removal and mitigation other restoration and mitigation work will be developed. This will be partly guided by the framework for prioritising measures for both river restoration and Nature-based Catchment Management prepared by the EPA. [Timeline: 2026, onwards].

Action 3.10 (Repeated from Chapter 3 for completeness): The Minister for Housing, Local Government and Heritage will undertake a short public consultation before deciding whether to designate or de-designate water bodies as HMWBs. There were 466 water bodies which the EPA has found to meet the criteria for designation. The Minister will take into account the recommendations of the EPA and the key concerns raised in the submissions to the consultation process. [Timeframe Q2-Q3 2024].

Action 3.11 (Repeated from Chapter 3 for completeness): A review of arterial drainage requirements and the underpinning Arterial Drainage Act will be undertaken in order to inform future land use policy decisions, arising out of the Land Use Review, and to support the preparations for the implementation of the new Nature Restoration Law and the Heavily Modified Water Body review process.

The review will be supported by the OPW and other key stakeholders. Specific tasks will include:

1. Assessing and advising on the implications of different land use policy options in the future, arising out of the Land Use Review, on arterial drainage requirements and the consequential impacts (both positive and negative) on social, economic, climate, biodiversity and water status objectives and outcomes, and
2. Assessing and advising on the legislative changes to the Arterial Drainage Act necessary to (1) support the national land use policy objectives arising out of the Land Use Review, and (2) ensure that future arterial drainage practices are sustainable and support the environmental objectives set out in the 2021 Climate Action Plan, the WFD River Basin Management Plan, the National Biodiversity Action Plan and the related Nature Restoration Law, as well as flood risk management objectives.

3. Forestry

In total, **216** water bodies are currently characterised as impacted by pressures from the forestry sector, either solely or alongside pressures from other sectors. These include the physical alteration to habitats, excessive nutrients and sediment and changes in water level and/or flow. This is particularly evident in the high status objective waters.

As the Department with statutory responsibility for forestry, the Department of Agriculture, Food and the Marine (DAFM) recognises that inappropriately sited forests and poorly managed forest operations can negatively impact on water quality and on aquatic habitats and species, particularly in terms of sedimentation and nutrient runoff. As such, the protection of water forms a key component of the Department's assessment of all applications for forestry licences and grants. However, the Department and the wider forest sector also highlight the significant role that well sited and managed woodlands and forests can play in protecting and enhancing water quality, through the delivery of a range of water-related ecosystem services, in addition to services such as biodiversity, carbon sequestration, landscape, wood and non-wood products, and amenity.

Under the 2014 Forestry Act and enacting legislation, the Minister for Agriculture, Food and the Marine is required to promote and monitor the protection and enhancement of water quality when assessing applications for forestry activities. In doing so, DAFM must ensure that forestry operations and forest-based activities regulated under the Act are compatible with the requirements of the Water Framework Directive.

For the purposes of supporting the second River Basin Management Plan, DAFM published a supporting document called "*Forests & Water: Achieving the Objectives and Priorities under Ireland's River Basin Management Plan 2018–2021*". The document outlined the principal forestry-related legislative, policy, regulatory and promotional and research elements in place to address the challenges and opportunities for forestry set out in the RBMP. The aims of these measures were to safeguard water during all forestry operations, to restructure existing forests to reflect water sensitivities, and to situate and design new forests in a way that contributes to the achievement of the Environmental Objectives set out in that Plan. For the purposes of supporting the third River Basin Management Plan (2023-2027) the Forests & Water document will be reviewed and updated as the Forestry Sector plan supporting the 46 Catchment Management Work Plans.

The updated Forests & Water document will include;

- An assessment of the changes in water bodies identified as being at risk from forestry during the second-cycle.
- Tabulated actions proposed for the 216 water bodies at risk from Forestry, outlining what forestry activities are likely to be the cause of the significant pressure and the measures to address these.

Since the publication of the River Basin Management Plan for the second-cycle of the WFD, the assessment by DAFM of licence applications for key forestry activities including afforestation, forest road construction and tree felling, and reforestation has undergone significant changes, particularly in relation to ecological issues. Such changes, which are primarily the result of legal rulings at a European and national level, and outcomes from the Forestry Appeals Committee process, are having a significant overarching effect that strengthens the protection of water from forestry-related sources, based on the source-pathway-receptor model. While the extent of the changes involved was not envisaged for forestry during the second-cycle, it is nevertheless important to highlight them now, in order to maintain an accurate record of the changes in land use planning and development that contribute towards the achievement of WFD objectives.

The changes involved relate primarily to the application of Appropriate Assessment, as required under Article 6(3) of the Habitats Directive and transposing legislation. Of particular impact was the *European Court of Justice ruling C-323/17 ('People Over Wind')*, which resulted in approximately 80% of forestry applications being screened in for Appropriate Assessment. In order to deal with the increased demand for ecological input into the forestry licensing process, and to address the resulting application backlog and the knock-on detrimental impact on the forestry sector, DAFM increased its full-time ecologist equivalents from one in early 2019 to over 27 in August 2021. DAFM also published the interim *Standards for Felling and Reforestation* (October 2019) and has increased the level of ecological and environmental information required as part of the submitted licence application in relation to afforestation, roading and tree felling (the latter including thinning and clearfelling / reforestation projects). These changes also prompted the increased

engagement of consultant ecologists by Registered Foresters when developing applications for forestry licences, something which DAFM has supported by hosting a Directory for Professional Ecologists who are available to work on forestry projects.

While many of these changes revolve around the implementation of the Habitats Directive, due to the multitude of intersections between forestry sites, water and downstream European Sites (the latter in relation to mobile species), much of the mitigation arising from the Appropriate Assessment process is focused on eliminating sedimentation and nutrient sources and preventing pathways that might otherwise transport these to adjoining or nearby water bodies. The dramatic increase in ecological input into the evaluation of licence applications since 2019 will have a beneficial impact in relation to the protection of water from forestry activities, adding to the stated measures for forestry identified in the second-cycle River Basin Management Plan.

In December 2020, DAFM launched a new Forestry Licence Viewer (FLV), which allows members of the public to view forestry licence applications anywhere in the country, including documents associated with the application and the application's live status. This strongly compliments those components of the overall assessment process relating to public consultation and referral to prescribed statutory bodies.

Other measures that will be progressed during the third-cycle plan include:

1. Ongoing restructuring of existing forest stands at clearfell / reforestation stage to incorporate appropriate water setbacks (potentially reinforced by broadleaf planting), that were absent in the previous rotation. (Timescale: Ongoing)
2. Ogoing application of water setbacks and other water-based protection during the creation of new forests, principally under the new Afforestation Grant and Premium Scheme 2023-2027. (Timescale: Ongoing)
3. Ongoing application of particular support measures that have a clear application in relation to the protection of water, including: the Continuous Cover Forestry Scheme; the native forest and agro-forestry options under the Afforestation Scheme (such option can represent part or all of an individual application); and the Native Woodland Conservation Scheme, funding the restoration of existing native woodlands (thereby enhancing their ability to deliver water related ecosystem services). A new financial support was also introduced in 2022 to facilitate pre-application consultation with DAFM, which enables the identification of key sensitivities very early on in the licensing process. (Timescale: Ongoing)
4. The development and introduction of new schemes under the proposed Forestry Programme 2023-2027, designed with the objective of water protection (alongside the delivery of other ecosystem services such as biodiversity, carbon capture and landscape). These include:
   - *Forests for Water:* A new scheme with added incentives to promote the creation of new native forests specifically to provide water-related ecosystem services, including improvements to water quality, drinking water source protection, natural water retention, the improvement of aquatic and riparian habitats, and the expansion of alluvial woodland. (Delivery: Q2 2024)
   - *Native Tree Area (NTA) Scheme*: The NTA Scheme has been devised as part of wider efforts to enable the State to achieve the transition to a low carbon, climate resilient, biodiversity rich and environmentally sustainable rural economy. The scheme allows for a simpler application process for native tree planting, where the 'footprint' planted is less than 1.0 ha in area and where undertaken in specific locations. The scheme facilitates the creation of new small-scale native forests that can deliver meaningful ecosystem services that protect and enhance water quality and aquatic ecosystems. The creation of these permanent semi-natural landscape features alongside streams, rivers and lakes will protect and enhance water quality and aquatic habitats into the future. These forests also provide wider biodiversity functions by protecting and expanding existing native forests. The NTA Scheme (and the Forests for Water Scheme) can be used to develop appropriate green corridors centred along stretches of our waterways. Such corridors can help reconnect those waterways with existing native forests and other semi-natural and natural habitats, thereby helping to reverse habitual fragmentation at a landscape scale. (Timescale: Ongoing)
   - *Forest Environmental Enhancement Scheme:* This scheme will provide support to create or expand water setbacks within existing forests during the current rotation, where not installed at planting. It will also provide funding for the removal of naturally regenerating conifers within existing water setbacks, and for the slow-water damming of historical forestry drains which, as a result

of previous practices, connect directly into natural watercourses. (Delivery: Q2 2024).

» *Continuous Cover Forestry (CCF) Schemes*: The DAFM currently operates a CCF scheme and proposes its inclusion in the new Forestry Programme. Under this scheme support will be provided to help convert single age monoculture forests to a more diverse type of forest in terms of both age classes and species. This enables future forest management to move away from the clearfell system and the associate exposure of soils at felling. However, this approach may not be possible in many forests (particularly those on peat soils) as it often leads to instability and windfall. DAFM now offers grant support at afforestation to promote the creation of new CCF forests on greenfield sites, and an additional scheme to promote this type of planting at reforestation (i.e. post clearfell) is also included under the new Forestry Programme, to ensure that subsequent forests will not undergo clearfelling in the future. (Delivery: Q2 2024).

The revised Forest Road Scheme under the new Forestry Programme 2023-2027 contains funding for the following, with related projects expected to be delivered throughout 2024 and onwards:

» *Temporary Access Solutions*: This provision supports the development and use of temporary bridging for forest roads. This will reduce the need for culverts and the associated instream works to access and harvest forests within sensitive areas. (Timescale: Ongoing)

» *Forest Road Scheme Special Construction Works*: This provision provides funding for additional measures, including the installation of constructed wetlands and water attenuation, to disrupt pathways for silt and sediment potentially arising from forest roading. (Timescale: Ongoing)

» *Climate Resilient Reforestation, Element 3 (Reforestation for Biodiversity and Water Protection)*: This measure will provide support for the creation of a mosaic of open habitat and native scrub/forest on clearfelled sites, to enhance biodiversity and to increase the level of protection for onsite or adjoining biodiversity features, habitats and watercourses. In addition, the scheme will promote riparian restoration and the increased protection of wetlands, while also increasing habitat connectivity and biodiversity corridors. This measure will be set up on a pilot basis initially. (Delivery: Q2 2024).

» *Climate Resilient Reforestation, Element 2 (Reforestation with Native Forests)*: This scheme will support the reforestation of felled conifer stands, with native woodland. Such transformation, previously funded under the Native Woodland Conservation Scheme, will enable significant changes regarding the type of forest cover and future forest management, with clear benefits regarding water, biodiversity, landscape, etc. (Delivery: Q2 2024)

» Both DAFM and Coillte are co-beneficiaries of the Waters of LIFE IP focused on High Status Objective Waterbodies and land use management therein. The project will be a testbed for a variety of forest management techniques, building on the knowledge gained from the KerryLIFE Project, an EU LIFE project focused on land management and Freshwater Pearl Mussel. Opportunities for new potential schemes and measures will be explored during the lifetime of the Waters of LIFE project. (Timescale: Ongoing)

5. Increased uptake of the recently revised Forest Creation on Public Lands Scheme to deliver forest-based solutions for the protection of drinking water sources and water in general. This scheme, now represented by Forest Type 3: Forests on Public Lands under the new Afforestation Scheme 2023-2027, encourages public bodies to create native woodland on land owned by them as part of the achievement of their own objectives regarding water, biodiversity, carbon capture and sustainability. (Timescale: Ongoing)
6. The resolution of forestry-related water incidents, as identified by DAFM Inspectors or reported to the Department by foresters, water agencies, Local Authorities, LAWPRO, NGOs and members of the public. (Timescale: Ongoing)
7. Further engagement between DAFM and other parties on issues relating to forestry and water, both within the existing WFD structures and forums, and bilaterally. The DAFM Forestry Inspectorate meets quarterly with Inland Fisheries Ireland and engages with other agencies through various working groups and processes. For example, work is ongoing with OPW regarding the adoption and use of future datasets in the Forests for Water Scheme. The EPA PIP maps for phosphorus have been added to the IFORIS GIS system, which is used for assessing licence applications. Also, a new alluvial woodland scenario is being

developed with National Parks and Wildlife Services and Woodlands of Ireland, to expand the number of native woodland types that can be realised under the various native woodland options under the Forestry Programme 2023-2027, including those relation to afforestation, woodland restoration, and reforestation. (Timescale: Ongoing)

8. Further training of Registered Foresters, Consultant Ecologists and (crucially) machine operators, and DAFM Forestry Inspectors and Ecologists, in relation to the design, assessment and implementation of forestry projects from the perspective of protecting and enhancing receiving waterways. (Delivery: Q3 2024).
9. Continued engagement and co-operation with LAWPRO. Where forestry referrals are received from LAWPRO, the spatial data associated with the referral are added to IFORIS and included in the assessment of any licence applications. (Timescale: Ongoing)

While several of the above measures represent a continuation of existing efforts, they will be undertaken within the context of the enhanced level of ecological assessment of forestry applications that now applies, as outlined above. The protection of water is also reinforced by the conditions underpinning afforestation funded under Ireland's Forestry Programme 2023-2027, which received State aid approval by DG Environment in late 2023. Such conditions included new restrictions relating to peat, wetlands, SPAs, wader species and High Nature Value farmland. More stringent requirements also apply regarding site fertility, pulling afforestation further away from water-sensitive landscapes. Additionally, Ireland's Forestry Strategy 2023-2030, launched in September 2023, aims to advance Ireland's Shared National Vision for Trees, Woods and Forests in Ireland, by *"urgently expand*[-ing] *the national forest estate on both public and private land in a manner that will deliver lasting benefits for climate change, biodiversity, water quality, wood production, economic development, employment and quality of life. This will be a challenge of significant proportions, which will require a whole of society and whole of government response if* [it is] *to succeed."* The Shared National Vision, Strategy and Programme reflect the outcomes of Project Woodland, a multi-stakeholder initiative established in February 2021 to (inter alia) develop a shared vision for forestry, which is to ensure, "The right trees in the right places for the right reasons with the right management – supporting a sustainable and thriving economy and society and a healthy environment."

Tree Planting and Integration with the CAP Strategic Plan: Tree planting actions have been included in both Pillar 1 and Pillar 2 of the CAP Strategic Plan. The new Eco-Scheme (Pillar 1) includes tree planting as part of the menu of options from which farmers can choose. The Pillar II Agri-Climate Rural Environment Scheme (ACRES) includes significant tree planting actions for specific objectives.

A summary of Forestry Actions for the third RBMP includes;

Forestry 1: In support of the Catchment Management Work Plans, the Department of Agriculture, Food and the Marine will publish a Sectoral Action Work Plan. DAFM will update the 2018 document "*Forests and Water: Achieving Objectives under Ireland's River Basin Management Plan 2018-2021*" as the Forestry Sectoral Action Work Plan supporting the third RBMP. The updated Forests & Water document will include:

- an assessment of the changes in water bodies identified as being at risk from forestry during the second-cycle.
- tabulated actions proposed for the 216 water bodies at risk from forestry, identifying those activities most likely to be the cause of the significant pressure
- details of the assessment and enforcement process that applies to all applications for forest licences (with or without grant aid). This includes: (i) an overview of the detailed level of ecological assessment now applied by *c.*27 FTE Ecologists, which contributes significantly to the protection of water, through licence conditionality; and (ii) the range of robust standardised requirements applied to all projects, which provide consistency and clarity to foresters and a robust baseline level of protection. In addition;
  - » A number of existing and new restrictions under the new Forestry Programme 2023-2027 now rule out afforestation on a wide range of site types and situations.
  - » DAFM's policy on permanent forest removal is set out in the document *Felling & Reforestation Policy, May, 2017*. Forest removal is considered where overriding environmental concerns exist that cannot be addressed adequately through restructuring at reforestation.
- Where evidence shows that additional, targeted measures beyond standard requirements are needed to address pressures fully, these will be identified and implemented, through licensing.
- The new Forestry Programme includes a number of schemes that can be used within these sub-basins (and elsewhere) to fund changes that protect and enhance water quality. Key among these are schemes funding native woodland creation and continuous cover forestry. In addition,

- » DAFM is compiling an exhaustive suite of effective mitigation in relation to felling, reforestation and forest roading, to be applied through licensing.
- » DAFM is working with Waters of LIFE IP partners in trialling various approaches to forestry operations within selected sub-basins of high status water bodies, where forestry is a significant pressure. Experiences from this project and from KerryLIFE, will inform DAFM's ongoing approach.
- » DAFM is undertaking water monitoring in several heavily-forested catchments, to check the efficacy of various mitigations incorporated into forest management upstream.

[Timescale: 2024 and ongoing, thereafter].

Forestry 2: DAFM recognises the key recommendation from the HYDROFOR Project (2016) to "cease afforestation on peat soils in acid-sensitive headwater catchments", and is applying various water and non-water related policies, procedures and protocols that combine to rule out afforestation on such sites, or to limit it to appropriate multi-benefit native woodland.

Due to a multitude of environmental factors relating to water, biodiversity, carbon, landscape and amenity, and forest operational issues relating to productivity, access and the risk of windblow, DAFM's policy and scheme structure have led to a consistent reduction in the level of afforestation undertaken on peat soils in acid-sensitive headwater catchments over the last 20+ years.

Key elements that ensure that afforestation will continue to move away from such landscapes include various policies now underpinning the Forestry Programme 2023 - 2027, such as:

- soil-type requirements that rule afforestation ineligible on a wide range of peat site types, driven primarily by carbon budget considerations;
- site fertility requirements, which push afforestation further away from nutrient-poor land; and
- biodiversity-related requirements that overlap strongly with these acid-sensitive headwater catchments, including exclusions relating to SPAs, defined wetland habitats and within 1.5 km of known curlew nesting sites, and procedures regarding sites within the Irish Wetland Survey, sites important for other wader species, and high nature value farmland.

Existing procedures also restrict afforestation within these catchments. First and foremost is the Acid Sensitivity Protocol that rules out commercial afforestation from areas of the country designed by the EPA and others as being acid sensitive. This protocol is based on project-level prescribed water sampling and analyses. Also, of particular relevance is the Habitats Directive Appropriate Assessment Procedure applied to all forestry applications, supported by *c.*27 FTE Ecologists within the Forestry Inspectorate. While focusing on possible impacts on SACs and SPAs, the process can often rule out afforestation, or severely restrict it, with these catchments, due to the preponderance of hydrological connectivity across the land.

As described, numerous policies and procedures are in place, driven by concerns regarding water, biodiversity, carbon, landscape and other sensitivities, that severely limit afforestation on peat soils in acid sensitive headwater catchments, and these will remain in place throughout the current Forestry Programme. However, DAFM does not pursue a zero afforestation policy in these areas, to allow certain types of afforestation – in particular, native woodland creation – to play a positive role in protecting a multitude of environmental sensitivities within these areas, including water. [Timescale: Ongoing].

Forestry 3: DAFM to increase the area of forests with appropriate water setbacks through the ongoing restructuring of existing forest stands at clearfell / reforestation stage [Timescale: Ongoing].

Forestry 4: DAFM to ensure the application of water setbacks and other water-based protection during the creation of new forests, principally realised with support under the 2023 – 2027 Afforestation Scheme. [Timescale: Ongoing].

Forestry 5: DAFM to manage the application of support measures that have a clear role in relation to the protection of water, including: the Continuous Cover Forestry Scheme; the various native woodland and agro-forestry options under the Afforestation Scheme, the Native Woodland Conservation Scheme, and the Reforestation for Climate Resilience Scheme. [Timescale: Ongoing].

Forestry 6: DAFM to encourage the uptake of Forest Type 3 under the Afforestation Scheme, aimed at funding native woodland creation on public land, specifically to deliver woodland-based solutions for the protection of drinking water sources and water in general [Timescale: Ongoing].

Forestry 7: DAFM to launch the new Forests for Water option (Forest Type 2) under the Afforestation Scheme, which offers added incentives to farmers and other landowners to promote the creation of new native forests specifically to provide water services, including improvements to water quality, drinking water source protection, natural water retention, the

improvement of aquatic and riparian habitats, and the expansion of alluvial woodland. [Timescale: 2024].

Forestry 8: DAFM to continue to address all forestry related water incidents, as identified by DAFM Inspectors and LAWPRO or reported to DAFM Forestry by foresters, water agencies, environmental NGOs and members of the public. [Timescale: Ongoing].

Forestry 9: DAFM to train Registered Foresters, Consultant Ecologists and machine operators, in relation to the design, and implementation of forestry projects, from the perspective of protecting and enhancing receiving waterways. [Timescale: commence from Q3 2024, onwards].

Forestry 10: Continue to seek improvements to the licence applications process for key forestry activities.

4. Urban Wastewater

The objective of the Urban Wastewater Treatment Directive (UWWTD) is to minimise the impact of urban wastewater discharges on receiving waters. This approach contributes to the objectives of the Water Framework Directive, however in some cases additional emission limit values may be required to reach these objectives over and above UWWTD compliance.

The alignment of Uisce Éireann's investment programme for wastewater collection and treatment with the compliance requirements of the Urban Wastewater Treatment Directive and the Water Framework Directive will facilitate the delivery of their objectives in an agreed timeframe. The Programme for Government commits to continued investment in wastewater infrastructure to protect waterways. During the Uisce Éireann investment period 2020-2024, there is investment in 108 wastewater treatment plants, 77 collection networks and 92 related national programmes at an estimated cost of €2.3bn. Examples of works under national programmes include; development of Drainage Area Plans, assessment of stormwater overflows, surveys and monitoring of WWDA certificate sites and reduction of infiltration and inflow in wastewater networks. Uisce Éireann's next investment period 2025-2029 also overlaps with the third-cycle RBMP, however commitments on wastewater treatment deliverables within that period have yet to be agreed. The infrastructural projects included in this investment period will be based on a combination of completing works started in the current investment period and addressing the infrastructural deficit. These projects are outlined in the Uisce Éireann project lists which are included in Appendix 6. This infrastructural deficit is identified based on a gap analysis of the requirements to reach compliance with the UWWTD, the Water Framework Directive and provision of capacity for population and economic growth over 20 years. The gap analysis is dynamic, it will be reviewed and updated every two years to track changing needs and growth patterns. It also provides a platform for environmental outcomes driven investment planning.

This investment will upgrade infrastructure, both treatment plants and collection networks with the objectives of:

- Prioritising investment to deliver Protected Area Objectives and address the EPA Priority Areas List[5] of urban areas where treatment must be improved to resolve national environmental priorities. The Priority Area List has been reduced from 148 areas in 2017 to 89 areas in 2022.
- Ensuring continued compliance with the UWWTD as agglomeration populations grow.
- Ireland's National Recovery and Resilience Plan[6] includes the River Basin Management Plan – Enhanced Ambition Programme to advance priority wastewater treatment plant projects whose discharges have been identified as being significant pressures on water bodies and impacting on WFD objectives. Uisce Éireann have identified at least 10 Water Treatment plant upgrades works for inclusion in this programme by Q3 2022. The completion of the upgrades to the selected small wastewater treatment plants will be completed by Uisce Éireann by Q3 2025. This project is funded by the European Union under the National Recovery and Resilience Plan.

A list of the candidate list for wastewater treatment plant upgrade are included below. These candidate projects will be kept under review as the project advances.

- Ballymoe in Galway,
- Ballintra and Pettigo in Donegal,
- Galbally in Limerick,
- Clonea Power in Waterford,
- Grangemockler in Tipperary,
- Kilmaganny in Kilkenny,
- Kildavin in Carlow,
- Cloneygowan in Offaly,
- Millview (Milltownpass) in Westmeath, and
- Kilmihil in Clare.

During the third RBMP cycle Uisce Éireann will continue its investment in storm water overflows, through improvements and upgrades. Storm water overflows are designed to screen the first flush from the sewer system, retaining it for treatment and prevent overloading of wastewater treatment plants during periods of high surface water inflow to combined sewers caused by high rainfall. A specific

5 A link to the EPA Priority Areas list is located at page 3 of the Urban Wastewater Treatment in 2022 report Published October 2023 (ISBN: 978-1-80009-115-3)

6 The National Recovery and Resilience Plan is due to be implemented before the end of 2023.

list of the particular storm water overflows due for upgrade in this cycle are included in Appendix 8.

The EPA have noted **197** water bodies where urban wastewater has been identified as a significant pressure. Uisce Éireann have complied a list which specifies the dates for actions on these pressures. This list is attached in Appendix 7. These projects will overlap with the projects in other actions.

Details of the actions that Uisce Éireann has taken and plan to take in relation to these 197 water bodies are as follows:

- Works have been completed (projects completed prior to 2022) to address urban wastewater pressure on 8 water bodies.
- Projects are progressing in relation to 59 water bodies.
- 73 water bodies affected by wastewater treatment plants and network issues are under assessment. These projects are actively under assessment through various programmes or feasibility study routes. These assessments will assist in determining an appropriate solution for these 73 water bodies.
- Assessments will commence in 2023 for the remaining 57 water bodies affected by wastewater treatment plants, which will be complete by the end of **2027**.

The EPA review of Wastewater Discharge Licences (WWDLs) will also contribute to reaching and maintaining compliance with the UWWTD and WFD. These licence reviews will reflect the ever improving evidence base to ensure that WWDL's appropriately reflect the RBMP's objectives, including referrals made by LAWPRO to the EPA. Furthermore, the review of WWDL's will be prioritised based on specified grounds under the 2007 Wastewater Discharge Regulations.

A multi-annual investment programme will be undertaken to provide wastewater infrastructure for villages not served by public wastewater collection systems, to reduce untreated wastewater discharges to the environment and protect receiving waters.

Uisce Éireann will commence a Research and Innovation Programme on nature-based solutions for small WWTPs. In addition, the Nutrient Sensitive Areas designations under the Urban Wastewater Treatment Directive will also be updated.

UWW 1: Uisce Éireann will continue investment in wastewater infrastructure investing over €2.3bn over the period 2020-2024. This includes 108 wastewater treatment plants and 77 collection networks at an estimated cost of €1.542bn and 92 national programmes at an estimated cost of €780m.

UWW 2: Uisce Éireann will deliver infrastructure projects as set out in the Appendices for the next RBMP third-cycle (2022-2027). **[CABL #93]**

UWW 3: Uisce Éireann will assess urban wastewater requirements for the 197 Water Bodies where Urban Wastewater has been identified as a significant pressure by 2027, including any new significant pressure water bodies identified by LAWPRO. **[CABL #93]**

UWW 4: Uisce Éireann will apply for reviews of Wastewater Discharge Authorisations, where required. The applications shall be in a timeframe that is appropriate to the delivery programme and agreed with the EPA.

UWW 5: DHLGH will deliver a multi-annual investment programme to provide wastewater infrastructure for villages not served by public wastewater collection systems

UWW 6: Uisce Éireann's River Basin Management Plan – Enhanced Ambition Programme will deliver at least 10 new wastewater treatment plant upgrades not funded under the current investment plan where discharges have been identified as being significant pressures on water bodies and impacting on WFD objectives **[CABL #93]**

UWW 7: Uisce Éireann will continue investment in storm water overflows with a minimum of 139 upgrades over the period 2022-2027.

UWW 8: Following the completion of negotiations, DHLGH will undertake transposition into Irish law of the recast Urban Wastewater Treatment Directive.

UWW 9: Following the expected recast Urban Wastewater Treatment Directive the DHLGH will update the criteria for the performance of Combined Storm Water Overflows.

UWW 10: Uisce Éireann will put in place a Research and Innovation Programme on nature-based solutions for small wastewater treatment plants.

UWW 11: As part of the distance to target analysis process led by the EPA, the impact of Sectoral Action Work Plans, including that for urban wastewater discharges, will be assessed as part of the preparation of the 46 Catchment Management Work Plans. Uisce Éireann will publish a Sectoral Action Work Plan. The Sectoral Action Work Plan for urban wastewater discharges will include further detailed information on the targeting of measures to address the 197 water bodies at risk from urban wastewater discharges during the third-cycle.

Where the EPA distance to target analysis indicates that the achievement of WFD objectives in individual water bodies is not possible by 2027 for reasons

of technical feasibility and/or disproportionate costs of delivering urban wastewater treatment improvements, extensions of time may be considered, subject to meeting the relevant criteria in Article 4 of the WFD. The impact of urban wastewater discharges in the vicinity of bathing waters, shellfish waters and designated pearl mussel habitats are being assessed to determine if they are contributing to failures and whether more stringent wastewater treatment standards are required. Uisce Éireann will provide a timeline for both the assessments and the required treatment for all bathing waters, shellfish waters and designated pearl mussel habitats in its Sectoral Action Work Plan. [Timeframe 2024]

UWW 12: Uisce Éireann will engage with LAWPRO with the data required for their work in compiling the 46 catchment work plans and also trialling the Catchment Management Work Plans template in the 5 pilot catchments.

UWW 13: Continue to develop and update the distance to target/Gap Analysis as a tool to reflect Uisce Éireann's understanding of future needs, and consequent investment requirements.

UWW 14: Update the Nutrient Sensitive Areas designations under the Urban Wastewater Treatment Directive.

5. Urban Runoff Pressures

Urban runoff pressures on water quality are primarily made up of direct surface water discharges to water and storm water overflows from combined sewers. Separated sewers discharging rainwater may also be an important pathway for pollutants, such as metals and plastics. Urban run-off, which is a mixture of sewer leakage, run off from paved and un-paved areas and mis-connections are a significant contributory factor to the pressures on our water quality. In some places, these impacts may include deterioration in bathing water quality. Soil sealing or the loss of soil resources due to the covering of land for housing, roads or other construction work, across urban areas during the last number of years had increased surface water runoff. Climate change will make the management of urban water more challenging, especially dealing with more frequent and more intense rainfall in urban areas. In response, the consultation on the Significant Water Management Issues in Ireland and the draft River Basin Management Plan identified the need to improve performance in the area of nature-based sustainable urban drainage as one of the key considerations to be included in the third-cycle Plan. Management of urban drainage is closely related and will integrate the urban wastewater drainage in both separate and combined collection systems.

Sustainable Urban Drainage objectives are evident in the majority of the City and County Development plans. However, the resultant outcomes currently seem to be focused upon engineering solutions rather than nature-based solutions which will have multiple benefits for the environment. A working group was established jointly by the CCMA and DHLGH to oversee the development of a project scope to deliver an implementation strategy for nature-based Sustainable Urban Drainage Systems on a national scale. This strategy will support the City and County Development plans in the implementation of nature-based solutions to surface water management through water sensitive urban designs.

Changing our design / planning philosophy to ensure we consider making space for water, incorporating integrated catchment management principals and Water Sensitive Urban Design to place making will bring about better water quality protection and provide opportunities in terms of the public realm, health and other multiple benefits.

Nature-based sustainable urban drainage is designed to deal with rainfall in urban or paved areas in a manner as close as possible to that pertaining in the natural environment, replacing paved or impermeable areas with permeable nature-based surfaces, as well as providing adequate volumetric storage within the catchment in existing or proposed green areas and, ultimately, planning routes for overland flow that minimize flood damage.

The benefits are wide ranging, including a reduction in pollution from urban run-off, reduced flooding, reduced loading of combined sewer systems as well as increased greening of urban areas, improving biodiversity and the general sustainability of the urban environment.

Scoping the implementation strategy for nature-based SUDS involves;

- Identify technical guidance needs for local authorities in implementing nature-based SUDS.
- Identifying the current gaps in the technical and operational capacity including resources and training needs of the Local Government sector in the delivery of nature-based sustainable urban drainage solutions and assisting the sector in eliminating these obstacles.
- Identifying any shortcomings in current legislation and policy within the national and local government sector required to support the implementation of the Water Framework Directive.
- Making provision for appropriate coordination with related ongoing work in areas such as the Planning, Land Use Policy and the proposed changes to local authority functions or management structures.
- Identifying any required investment support for the delivery of this strategy, through the identification of potential key funding sources available from, for example; the exchequer, EU funding streams and private sector contributions.

In advance of a national implementation strategy for nature-based SUDS being delivered during the third-cycle of the RBMP, interim guidance to the Local and Planning Authorities on measures to be implemented to support the delivery of a greater focus on nature-based solutions within the constraints of the current legislation and policy has been provided.

As mentioned under the previous section on pressures from Urban Wastewater, the update of the Urban Wastewater Treatment Directive during the third-cycle will also see the development of new standards for Combined Storm Overflows to help

address the pressures from urban runoff, including those impacting on bathing waters.

Research Pilot projects to examine urban runoff in a number of sites will assist designers understand how the nature-based solutions work in an Irish context. This work will assist policy makers and technical professionals in incorporating appropriate solutions into their long-term plans. Domestic misconnection can cause a direct impact on downstream surface waters. The use of smart technologies to establish where these domestic misconnections may exist will help to find these and reduce their number. Preparing integrated urban drainage management plans will not only reduce pollution risk and manage water inputs at source but will also be a key enabler to the increased development potential of the various regions.

The summary of Actions includes;

Urban Runoff 1: LAWPRO in conjunction with DHLGH to develop recommendations for an implementation strategy for nature-based Sustainable Urban Drainage Systems on a national scale. **[CABL #100]**

Urban Runoff 2: DHLGH to provide interim guidance documentation to the Local and Planning Authorities on measures to be implemented to support the delivery of a greater focus on nature-based solutions in advance of a national implementation strategy. [Note: The interim guidance was delivered in Q4 2021].

Urban Runoff 3: Develop a National Implementation Strategy for Nature-based Sustainable Urban Drainage Systems on a national scale.

Urban Runoff 4: DHLGH to establish a pilot project to investigate solutions to urban runoff using Nature-based Solutions.

Urban Runoff 5: Additional resources will be provided to LAWPRO to provide specialist support to local authorities in adopting international best practice on nature-based surface water management within planning and infrastructure project delivery (Two staff members by 2025. Cross reference to action under 'Governance/Implementation' measures on local authority resources)

Urban Runoff 6: The DHLGH will work with NIEA to seek Peace Plus funding projects, which will trial Nature-based Solution measures and sustainable technologies.

Urban Runoff 7: Review of outcomes of the Dublin Urban Rivers Life project.

Urban Runoff 8: Oversee the preparation of integrated urban drainage management plans.

6. Domestic Wastewater Discharges (Septic Tanks)

When categorising a significant pressure as coming from 'Domestic Wastewater', the EPA considers discharges from the following:

- Domestic wastewater systems (e.g. septic tanks) serving individual houses,
- Communal discharges from housing estates that do not currently discharge into an urban wastewater agglomeration operated by Uisce Éireann and,
- Wastewater discharges from systems that should be regulated under Section 4 licensing but currently are unauthorised.

In total there are **148** water bodies that have a significant impact from domestic wastewater. These significant pressures impacting water quality are broken down as follows:

- 75% from single house discharges,
- 15% from communal discharges and
- 10% from unauthorised discharges that should be covered under Section 4 licences.

Poorly performing, maintained, or located domestic wastewater treatment systems (such as septic tanks) are highlighted as a pressure on 12% of at-risk water bodies. These domestic wastewater systems are impacting on the water quality in rivers, lakes and groundwater particularly in areas of low soil permeability (e.g. peat and clay soils).

Local authorities are continuing to inspect individual domestic wastewater systems. This is an ongoing measure that will continue under the programme of measures for the forthcoming cycle. There are approximately 500,000 domestic wastewater systems serving a population equivalent of 1.4 million people. The inspection regime requires a minimum of 1,000 inspections in 2022 increasing to a minimum of 1,200 inspection per annum from 2023 to 2026 on individual systems, focusing on the areas of highest risk. Between 2017 and 2018, nearly half of the systems assessed failed to meet the required standards. This highlights that significant improvements are required by householders to address this significant pressure.

Grants to help householders are available from local authorities (funded by DHLGH) to upgrade and repair domestic wastewater systems that are:

- Advised as inadequate by the local authority as part of the National Inspection Plan;
- Situated in a Prioritised Area for Action, and identified by LAWPRO as a potential pressure on water quality; or
- Are situated in a High Status Objective Catchment Area.

Acknowledging that domestic wastewater treatment systems continue to be a significant environmental pressure, the EPA Code of Practice for Domestic Wastewater Treatment Systems (Population Equivalent ≤ 10) was updated, published in March 2021, and it came into effect on 7th June 2021.

A research project into the potential application of a zero discharge nature-based solutions as part of sustainable approach to domestic wastewater treatment was commissioned by the EPA in 2021. This project aims to examine the potential for zero discharge nature-based solutions, particularly in low permeability soils, which could impact on water quality and delivery of RBMP objectives. The application of a sustainable zero discharge nature-based solution would mitigate the environmental impact of domestic wastewater discharges and facilitate sustainable rural communities.

Communal discharges are private, community or developer provided wastewater services. Many of these are legacy issues related to poor and inadequate Developer Provided Infrastructure (DPI) in private housing developments. In 2019, the Department launched a multi-annual Developer-Provided Water Services Infrastructure Resolution Programme 2019-2021. Under this programme, local authorities were invited to bid for project funding for the sustainable resolution of DPI. In September 2020, allocations under this new multi-annual capital investment programme were announced. The objective of this programme is the progressive resolution of housing estates with developer provided water services infrastructure, to enable the Local Authorities to take these estates in charge.

To address the Communal Discharges the focus of the first multi-annual Developer-Provided Water Services Infrastructure Resolution Programme is on estates in towns and villages where the resolution is to connect their water services to the public networks. The programme also supports a number of pilot projects

where connection is not feasible in the immediate future. These pilot projects, together with a major study currently being undertaken by Uisce Éireann, will inform future policy considerations on resolving sub-standard developer provided infrastructure with sustainable solutions.

Wastewater discharges from systems that should be regulated under Section 4 licensing are existing commercially based activities such as nursing homes, B&B's and small hotels etc. which are discharging wastewater into unauthorised septic tanks. These premises need authorisations under Section 4 of the Local Government (Water Pollution) Act 1977 as amended by the Local Government (Water Pollution) Amendment Act 1990 from local authorities.

Domestic WW 1: DHLGH will continue to promote and monitor the uptake of the new grant schemes to ensure adequate numbers of people are availing of this measure. A research project will be initiated under the ESRI Research Programme on behaviours and attitudes to assess the level of uptake, impediments to uptake and to make recommendations for improving uptake. (Timescale 2024).

Domestic WW 2: A review of the National Inspection Plan (NIP) 2018-2021 was completed, with the outcome informing the next NIP for the period 2022-2027. An objective of these plans is to prioritise inspections to areas of greatest environmental and public health risk and secure upgrading works where required.

Domestic WW 3: Local authorities to engage with householders to improve general awareness of septic tank maintenance requirements, and to address any failing septic tanks

Domestic WW 4: Local authorities to complete 5,800 inspections between 2022 and 2026 under the National Inspection Programme.

Domestic WW 5: The Department of Housing, Local Government and Heritage to issue a policy direction to Local Authorities regarding Advisory Notices and Local Authorities to enforce advisory notices issued under the National Inspection Plan.

Domestic WW 6: DHLGH to consider the outcomes of the research project into the application of zero discharge nature-based solutions and their applicability or not within Ireland's climatic conditions.

Domestic WW 7: Review the outcomes of the pilot projects under the first multi-annual Developer-Provided Water Services Infrastructure Resolution Programme to inform future policy considerations on resolving sub-standard developer provided infrastructure with sustainable solutions.

7. Unknown Pressures

There are some water bodies where the issue(s) causing the impact or putting the objectives at risk are either unknown or there is low confidence in the causes of the issues in the catchment. The EPA has identified those water bodies that are at risk of not meeting their environmental objectives. Detailed assessments were undertaken to identify the significant pressures preventing the water bodies from achieving these objectives. From the assessment of 1,649 water bodies at risk: the significant pressures for **212** are still to be fully identified. These unknown pressures are either individual significant pressures or combinations of significant pressures listed elsewhere, so the measures required will be those listed or combinations of measures listed in the Plan.

The majority of these water bodies with unknown pressures are within the Priority Areas for Action. Each of these water bodies will undergo a targeted pressure-impact assessment by the Local Authority Waters Programme. This assessment will be used to identify the significant pressures in these areas with a high level of confidence. To address the remaining unknown pressures, assessments will be undertaken by the local authority responsible for each individual water body. The result of these assessments will inform the required measures to be undertaken to achieve the environmental objectives.

To support the WFD work carried out by Local Authorities, including in relation to unknown pressures, the Local Authority Services National Training Group (LASNTG) has commenced a Training Programme for Catchment Assessment and Integrated Catchment Management for the staff of local authorities and WFD implementing bodies. Funded by DHLGH, this initial 3-year training programme will embed a modern approach to catchment assessment across the relevant staff. The first cycle of this course was completed in 2022 with over 100 learners, and for 2023 enrolment, this will now also be made available to members of the ACRES Cooperation Project Teams, who are responsible for delivering the ACRES CP scheme under the CAP Strategic Plan.

The LASNTG will also prioritise for training development the update of the Agricultural Pollution Inspection Programme.

Unknown 1: The Local Authority Waters Programme (LAWPRO) will conduct assessments of water bodies in Priority Areas for Action where the pressures are unknown to identify the specific issues and actions that are required to protect or restore water quality as necessary.

Unknown 2: Each local authority supported by LAWPRO will conduct assessments of other water bodies where the pressures are unknown (which are not within priority areas for action) to identify the specific issues and actions that are required to protect water quality as necessary.

Unknown 3: The Local Authority Services National Training Group (LASNTG) will provide appropriate training programmes including on Catchment assessment, Integrated Catchment Management, and farm inspections for the staff of local authorities and all implementing bodies.

8. Other Pressures

Impacting on **136** water bodies, these pressures include, for example, aquaculture, historically polluted sites, invasive species and waste. As these activities each impact a relatively small number of water bodies, they have been grouped together.

Some of these pressures, such as invasive alien species and aquaculture, have been highlighted through both the SWMI consultation and our engagements with stakeholders as significant issues in their own right. As a result, they are dealt with separately within this Appendix under Section 12 (invasive alien species) and Section 14 (aquaculture).

In terms of measures for those pressures not highlighted as significant issues, these will be dealt with through the implementation of basic regulatory measures and on a case-by-case basis by the relevant responsible body, using the implementation structures described in the Plan, as and when required.

Other 1: DHLGH will prepare a proposal for enacting abstraction regulations. (Target: End of Q2 2024)

Other 2: The EPA, as competent authority, will work with stakeholders to identify mitigation measures for abstractions determined to be significant pressures, and through the abstraction licensing process, require the implementation of relevant mitigation measures.

Other 3: The need for exemptions will be reviewed as the abstraction licensing process is rolled out.

9. Peatlands

Peatland management influences the level, quantity and quality of water in the surrounding countryside. Impacts on water quality and river habitat arising from peat and peat extraction, including associated drainage, include the release of ammonium and fine-grained suspended sediments, and physical alteration of aquatic habitats. Drainage of peatlands also results in changes to the hydromorphological condition of rivers.

Appropriate habitat management combined with the restoration and rehabilitation of damaged and degraded peatlands can lead to improvements in the quality of water arising from peatland catchments. Maintaining and restoring Irish bogs will lead to a decrease in waterborne carbon leaching to levels comparable with intact bogs as well as reducing losses of peat silt and ammonia. Vegetation on the surface of the peat can also slow the flow of water over the land surface.

Based on the EPA's most recent reports, peat extraction and drainage is impacting on **106** water bodies across the country, with peat the single pressure on 28 of these water bodies. However, compared to the data in the second-cycle plan, the number of water bodies impacted by peat has decreased.

The National Peatlands Strategy (2015-2025), aims to provide a long-term framework within which all of the peatlands within the State can be managed responsibly in order to optimise their social, environmental and economic contributions to the well-being of the State. Contained within the strategy is a number of guiding principles and specific actions that also benefit water quality and the objectives of the Water Framework Directive. The implementation of actions set out in the strategy is monitored by the Peatlands Strategy Implementation Group, with members consisting of various Government Departments, state agencies and bodies.

Building on the work of the National Peatlands Strategy to date, a public consultation on the mid-term review of the strategy was undertaken in Q2 2021. The purpose of the mid-term review was to adapt to a rapidly changing context as circumstances evolved, with the understanding that goals and actions would need to be updated, thus maintaining a 'living document'. With that in mind, the actions set out in the National Peatlands Strategy have been updated into a new Implementation Plan which will focus on refining outstanding actions and prioritising measurable, achievable objectives.

A number of upland habitat conservation projects within Ireland were awarded European Innovation Partnerships (EIPs) funding, where ecologically sustainable grazing in upland habitats is a cross-cutting deliverable. Projects commenced in 2018 and involve upland areas within the Blackstairs Mountains, Wicklow Mountains and MacGillycuddy Reeks Mountains. The EIP project - 'Blackstairs Farming Futures (BFF) Sustainable farming project in the Blackstairs Mountains', aims to maintain and improve peatland habitats and associated semi-natural habitats within the Blackstairs Mountains. Another EIP project - 'Sustainable Uplands Agri-environment Scheme (SUAS)', has a similar objective. With finalisation of these EIP projects, both areas have been substantially subsumed into the ACRES East/ South East Cooperation Project zone for continued implementation of actions. The EIP project – 'A Sustainable Agricultural Plan for the MacGillycuddy Reeks – Conservation and restoration of Upland Habitat in the MacGillycuddy Reeks', is ongoing and aiming to implement sustainable management of upland peatlands (e.g. wet heath, dry heath and blanket bog) and grasslands.

Two EIPs were also launched in 2021 that focus on finding better ways to manage on-farm drained peat soils in the Midlands. The first looks at developing a proposed farm programme that aims to enhance the ecological and hydrological functioning of transitional areas through a payment model whereby farmers receive results-based payments based on the quality of their habitats, while also having the opportunity of claiming additional funds to undertake farm actions. The second project works with participating landowners who farm peatlands. They will provide supports through participatory learning and accessible advice to voluntarily transition their land use from current conventional farming practices to economically viable carbon farming methods. Lessons learned and data gathered will be used to establish a practical model for future expansion of these new methods on farmed peatlands.

Collaborative Action for the Natura Network (CANN) is a conservation project supported by the INTERREG VA Programme to improve the condition of protected blanket bog and key wetland habitats and support the priority species found there on a cross-border basis (Ireland, Northern Ireland, Scotland). The project has successfully finished, having achieved its targets. The CANN project team produced Conservation Action Plans (27 no.) for a range of sites across the jurisdictions, which were designated as Special Areas of Conservation (SACs) and accumulatively account

for over 25,000 hectares of land. Direct conservation actions were carried out on 3,605 hectares of these SACs with the goal of assisting the habitats and species found at these sites towards favourable conservation status. Erosion control measures were tested on a pilot site on Cuilcagh/Anierin Upland SAC and detailed strategy to inform prevention and control of fires has been devised for this site. The outputs of this project will continue to inform ongoing peatland restoration measures.

Co-operation across Borders for Biodiversity (CABB) is the second conservation project supported by the INTERREG VA Programme, and concluded in 2021. One of the aims of this project was to restore 2,228 ha of blanket bog across three counties in the border region of Ireland. Conservation measures included drain blocking, fencing, adoption of appropriate grazing levels, and the devising of Conservation Action Plans. In Ireland the rewetting project work was completed in February 2021 at Fiddandarry in the Ox Mountains Bogs SAC and successfully installed 2,089 peat dams within c. 35 km of drains in deep blanket bog. This effect on water levels and vegetation was monitored at this site. The outputs of this project will continue to inform ongoing peatland restoration measures.

In the previous RBMP, a commitment was made for Bord na Móna to rehabilitate an additional 25 peatlands covering approximately 9,000 hectares over the course of the plan. By the end of 2020 approximately 7,000 hectares or 78% of this target has been rehabilitated.

In line with Bord na Móna's accelerated decarbonisation strategy the Enhanced Decommissioning Rehabilitation and Restoration Scheme (EDRRS) was approved by the Government in November 2020. EDRRS encompasses rehabilitation work on approximately 33,000 hectares of Bord na Móna peatlands, spanning 82 bogs, previously harvested for peat extraction for electricity generation.

The funding of €108 million for this scheme is being sourced from the National Recovery and Resilience Fund (NRRF). The Department of the Environment, Climate and Communications administers the scheme and it is regulated by the Department of Housing, Local Government and Heritage, under the National Parks and Wildlife Service. Bord na Móna are undertaking the operational work under this scheme. A Memorandum of Understanding is in place between the two Departments and a set of regulatory controls has been agreed by all three parties. Once rehabilitated, the peatlands will include peat forming bogs and a mosaic of wetlands, grasslands, and native woodlands, protecting the storage of carbon, enhancing biodiversity and contributing to Ireland's target of carbon neutrality. To date over 11,000 hectares of peatlands has been rehabilitated.

The National Parks and Wildlife Service (NPWS) of the Department of Housing, Local Government and Heritage are progressing with an accelerated programme of restoration on its protected raised bogs. The National Raised Bog Special Areas of Conservation Management Plan 2017-2022, approved by the Government and published in December 2017, sets out how the raised bog special areas of conservation and natural heritage areas are to be managed, conserved and restored and how the needs of turf cutters are to be addressed, including setting out measures promoting linkages to River Basin Management Plans. Restoration of raised bogs is also an action within Irelands Climate Action Plan and 'Our Rural Future - Rural Development Policy 2021-2025'. Restoring these bogs will provide multiple ecosystem services such as reducing emissions, water and air quality improvements, flood mitigation and enhancing biodiversity. Projects such as the EU LIFE programme '*Restoring Active Raised Bog in Ireland's SAC Network 2016-2022'* support the improvements to peatlands and help achieve these objectives, as well as developing amenity potential. To measure and report on the impact restoration work has on the environment and local climate, a network of greenhouse gas and hydrometric observation sites has been implemented by NPWS and part of on-going monitoring programmes. NPWS intend to continue and expand the national programme of peatland restoration on SAC and NHA raised bogs, blanket bogs and fens.

Also led by the Department of Housing, Local Government and Heritage, the Wild Atlantic Nature LIFE Integrated Project (IP) aims to improve Ireland's performance in conserving habitats, and in particular to improve the conservation status in the Special Areas of Conservation (SAC) Network of blanket bog. A priority habitat under the Habitats Directive, this €20m, nine-year project (2021-2029) will work with farmers and local communities to conserve and improve the quality of blanket bogs and associated habitats, and the ecosystem services they provide including clean water, carbon storage and biodiversity.

The project will include a pilot voluntary Results Based agri-environment Payment Scheme (RBPS) that will be linked to the quality of the habitat, thereby putting the landowner, their skills, expertise and knowledge of their land central to the development of this project. The project has a particular focus on water quality via land use management. It uses an RBPS programme template that was designed specifically for protecting and restoring water quality, including the use of terrestrial habitat as a surrogate. Water quality monitoring and evaluation are an inherent aspects of the Wild Atlantic Nature project. NPWS will continue this programme, including the

development of complementary projects such as enhancing restoration capacity through building projects such as *Natura Communities*, retrofitting programmes to reduce turf cutting in the Natura 2000 network of sites and the development of a nature restoration programme compatible with Ireland's CAP Strategic Plan.

Another LIFE Integrated Project that will seek to address issues around Peatlands is the seven year "*Peatlands and People*" project. Running from 2020 – 2027, and coordinated by Bord na Móna, the project will support improvements across upwards of 9,900ha of peatlands, with complementary actions benefiting over circa 28,100ha of peatlands and 40,000ha of grasslands. This will be achieved by collaborating locally, regionally, nationally and internationally to generate and share solutions and knowledge.

NPWS intend to develop and establish an NPWS-coordinated '*Wetland Restoration Scheme*' for restoration on fen and other wetland habitats across the Irish Midlands. Under the EU Just Transition Fund, the DHLGH has been awarded €12m for the scheme. The Wetlands Restoration Scheme commenced in Autumn 2023 and will run to the end of December 2026. The scheme will include the development of restoration plans and drainage management plans for all project sites.

NPWS and Intel Corporation are collaborating on funding to restore 60 hectares of blanket bog in the Wicklow Mountains National Park. The aim of this project is to increase water storage levels in areas that supply much of the Greater Dublin region, protect biodiversity and improve carbon storage and water quality. This public-private project collaboration is one of the first of its kind in Ireland. This project was due to be completed by the end of 2023.

NPWS are co-funding a concept note for the European Investment Bank's (EIB) Natural Capital Financing Facility (NCFF) that will support a framework for peatland restoration involving communities and potential new financing approaches. This initial phase will identify a potential scope and willing borrower for an NCFF loan to a public or private entity implementing activities for restoration of peatlands and other potential biodiversity actions. The aim is to leverage opportunities for peatlands by creating lasting benefits for regional economies and optimising downstream effects, deploying scalable models for a community led approach and water catchment management as well as support paradigms for decarbonisation of land-use, including agriculture in peat areas. In 2022, the Minister for Housing, Local Government and Heritage and EIB Vice-President formally agreed to strengthen cooperation for peatland restoration in Ireland with the European Investment Bank supporting NPWS efforts to accelerate the restoration of peatlands across the country. This strengthened cooperation will bring together Government and state-owned enterprises, the private sector and local actors under a coordinated strategy for planning and financing peatland rehabilitation.

Recognising the important role peatlands play in helping to protect and restore our natural environment, and their impact on water quality, the EPA identified "*Water quality improvements arising from the enhanced restoration*" as a topic under their 2021 research call. For the EPA 2022 research call, a research topic titled "*A state of knowledge of peatland research past and present to assist the State in the future sustainable management and planning around this major national resource*", was identified.

Building on the above, suggested measures for completion during the third-cycle plan include:

Peat 1: Measures set out in the National Peatlands Strategy to be updated into a new Implementation Plan by NPWS.

Peat 2: In support of the Catchment Management Work Plans, the NPWS will publish a Sectoral Action Work Plan. Measures set out in the National Peatlands Strategy to be updated into the Sectoral Action Work Plan by NPWS.

Peat 3: Continuation and expansion of NPWS national programme of peatland restoration on SAC and NHA raised bogs, blanket bogs and fens.

Peat 4: Bord na Móna to oversee the EU LIFE Integrated Project "Peatlands and People".

Peat 5: NPWS and Geological Survey Ireland to fund an investigation into the causes of blanket bog landslides that occurred across Ireland in 2020, and the vulnerability of other at-risk areas to future failures.

Peat 6: DAFM to oversee the implementation of sustainable management practices developed through the Blackstairs Mountains and Wicklow Mountains EIP projects within the ACRES East/South East Cooperation Project zone.

Peat 7: Continuation of the Bord na Móna operated Enhanced Decommissioning, Rehabilitation and Restoration Scheme (EDRRS) to H2 2026.

Peat 8: Continuation of NPWS-led EU LIFE IP Wild Atlantic Nature programme, including the development of complementary projects such as enhancing restoration capacity through building projects such as *Natura Communities*, retrofitting programmes to reduce turf cutting in the Natura 2000 network of sites and development of a nature restoration programme compatible with Ireland's CAP Strategic Plan.

10. Industry, Mines and Quarries

Industry is a significant pressure in **79** water bodies identified as being '*At Risk*' of not meeting their WFD objectives. Pressures include Integrated Pollution Control (IPC) and Industrial Emissions (IE) facilities licensed by the EPA and industries with Section 4 Discharge to Water licences issued by local authorities.

Mines and Quarries are impacting on **40** water bodies and is the only pressure causing the water body to be at risk of not meeting its WFD objectives in 6 of these. The impacts from quarrying on water bodies is mainly related to sediment, with dewatering from mining operations also impacting on the quality of our waters.

For Industry, Mines and Quarries, to date, we have largely relied on regulatory mechanisms of planning enforcements, linked to guidelines, permits or licences to protect our environment. The EPA have identified IPC, IE and waste licenced facilities that are considered a significant pressure on water quality under the WFD, and have prioritised them for enforcement. A site specific enforcement plan has been drawn up for each of the sites and the EPA are carrying out detailed investigations to identify what impact a site may be having on water quality. The EPA will continue to track the progress and implementation of the site specific enforcement plans throughout the third-cycle of the RBMP.

Helping industry to move away from just focusing on regulatory compliance, we have seen a steady increase in Water Stewardship Programmes being rolled out by industry bodies. For example, Uisce Éireann's Water Stewardship Programme for Business was launched in December 2020. Providing training for organisations, the programme seeks to change their behaviours and attitudes in relation to water from the basic management philosophy to a more holistic water stewardship approach, both within their facility and in the wider catchment.

This is a welcomed development that sees businesses go beyond a basic compliance perspective, with an aim of achieving excellence in water quality and quantity management as part of their operations.

As a critical resource for many industries, the potential that plentiful water resources of a high quality offer to attract foreign direct investment and support indigenous industries cannot be underestimated.

IMQ 1: DHLGH will examine opportunities to further support businesses in taking on a water stewardship approach in their operations.

Action 5.2 (Repeated from Chapter 5 for completeness)**:** The National Technical Implementation Group will identify the issues preventing water quality objectives from being achieved and will identify any further evidence, legislative, policy or implementation gaps that need to be addressed.

11. Drinking Water Source Protection

The protection of drinking water sources is now a specified requirement under the Drinking Water Directive 2020 (EU 2020/2184). With over 1,000 public water supplies and over 700 private supplies (not including individual domestic supplies), source protection will have a significant impact on water management activities around drinking water sources where the risk of contamination is high or the water treatment provided is not commensurate with the risk.

A Drinking Water Expert Group has been convened to provide advice to the Minister on the appropriate preparations and steps necessary for the successful transposition and implementation of the new Drinking Water Directive. This Expert Group is chaired by DHLGH and consists of representation from Uisce Éireann, County and City Management Association (CCMA), the Local Authority Waters Programme (LAWPRO), the National Federation of Group Water Schemes (NFGWS), the Environmental Protection Agency (EPA), Geological Survey of Ireland (GSI), the Department of Health, the Health Service Executive, the Health Protection Surveillance Centre, the Department of Agriculture, Food and the Marine (DAFM), the Irish National Accreditation Board (INAB), the National Standards Authority of Ireland (NSAI), Food Safety Authority of Ireland (FSAI) and the Commission for Regulation of Utilities (CRU).

The Expert Group initially considered drinking water source protection and has made recommendations in relation to the future governance and implementation arrangements. A new approach to drinking water source protection will deliver the following outcomes:

- Establish in legislation a risk based approach for the management of water supply catchments.
- Assignment of responsibilities to the most appropriate public bodies for the implementation of source protection across; risk assessment, monitoring and risk management.

An added benefit of the risk based approach will be the opportunity to address a number of ongoing compliance challenges, particularly with small private supplies.

The approach will build on the work being undertaken on drinking water source protection developed by Uisce Éireann and the NFGWS and provide a stronger legal framework for the protection of both surface waters and groundwaters which act as drinking water sources. This in turn will reduce the risks to drinking water sources from pollutants and microbial contaminants including E. coli and Cryptosporidium in both public and private water sources.

This work recognises and builds on the initiatives of the Geological Survey of Ireland, the Department of Agriculture Food and the Marine, Uisce Éireann, EPA and the NFGWS in developing a source protection strategies to help protect and restore the quality of water in drinking water source catchments and Uisce Éireann's work on Drinking Water Safety Plans. In parallel to the implementation of Drinking Water Source Protection the licensing of water abstractions through regulation to be issued under the Water Environment (Abstractions and Associated Impoundments) Act 2022 will provide greater control of the impact of water abstractions on the water environment ensuring environmental flows are provided to sustain the aquatic ecosystem and habitats.

Drinking Water 1: Development of Drinking Water Source Protection Framework and Guidelines to meet the requirements of the recast Drinking Water Directive, and incorporating the application of abstraction controls under the implementing regulations for the Water Environment (Abstractions and Associated Impoundments) Act 2022.

Drinking Water 2: A Sectoral Action Work Plan for Drinking Water will include measures and plans to address the source protection actions proposed under the Drinking Water Regulations. It will be coordinated by the DW Expert Group with support from Uisce Éireann, NFGWS and LAs.

12. Invasive Alien Species

Invasive Alien Species (IAS) are non-native species introduced outside their natural range that threaten ecosystems, habitats and native species with environmental or socio-economic harm. Currently 88 species have been identified across the EU as a high priority for management, and 12 of these occur in Ireland. As part of the public consultation on Significant Water Management Issues (SWMI) and the draft River Basin Management Plan, IAS was highlighted as one of the issues to be addressed in the RBMP. While still to be supported by evidence, the following aquatic and riparian species were highlighted in the responses to the SWMI consultation as those needing urgent attention:

- Japanese Knotweed;
- Himalayan Balsam;
- Zebra Mussels; and
- Crayfish Plague.

Non-native species which have been introduced into aquatic environments can become highly invasive and are often impossible to eradicate as they are difficult to control and contain. As part of their characterisation process for the third-cycle, the EPA have identified 48 water bodies that are currently impacted by IAS as either a single pressure or as part of multiple pressures. So while actions to reduce the likely introduction and spread of further species will be important, measures to address the current impact of invasive species on the quality of our water bodies will be required.

A number of measures to address this issue were highlighted in the second-cycle RBMP, these included:

- The implementation of EU Regulation (1143/2014) on "the prevention and management of the introduction and spread of invasive alien species";
- Putting in place clear governance arrangements for managing aquatic IAS in Ireland, including the assignment of responsibilities and development of agreed co-ordination mechanisms, including cross-border co-operation on the issue;
- The development of management plans for priority IAS, with priority given to high-impact IAS where eradication or control is possible;
- National guidelines for bio-security to be developed to prevent the introduction and spread of IAS and to mitigate their impacts;
- Harnessing community and stakeholder involvement and support to ensure the long-term management and control of IAS, through for example, LAWPRO and other state bodies; and
- The development of a National Management Plan for Invasive Alien Species. This plan is currently being drafted (led by NPWS) with an expert steering group. Public consultation on the plan will take place in early 2024.

In addition to the ongoing work in relation to the above, specific emergency regulations were introduced in 2018 to help restrict the introduction and spread of invasive species of alien crayfish.

As previously noted, given the shorter duration of the second RBMP, a number of measures are still in development or have been implemented recently and therefore there is insufficient data to provide scientific evidence of their impact. As a result, the third RBMP will continue to drive the implementation of the measures contained in the second RBMP. In particular, this includes the finalisation of legislation for the implementation of the EU IAS Regulation and the delivery of draft management plans. In addition, Priority Pathway Action Plans (PPAP) for Angling and for Recreational Boating and Watercraft have been published in 2022. A third PPAP for Soils and Spoil is currently at draft stage.

Work is also underway on drafting a National Management Plan for Invasive Alien Species to deliver on the commitment made in the Programme for Government. This will require the convening of a Steering Group to finalise the draft management plan, and public consultation and stakeholder engagement to inform the management plan prior to publication.

In October 2022, the Minister of State for Heritage and Local Government, Malcolm Noonan TD, announced funding for 10 local authorities to appoint Biodiversity Officers as part of a programme to be delivered by the Heritage Council and the City and County Management Association. Approval for an additional 11 positions was announced on 02 February 2023, bringing to 25 the total number of biodiversity officers in local authorities across Ireland. The full national rollout is expected to be completed within two years. This aligns with a commitment in the Programme for Government to tackle the climate and biodiversity crisis, following the Dáil's declaration of a Biodiversity Emergency in 2019, and the Citizens Assembly on Biodiversity Loss in 2022. In addition to developing a Biodiversity Plan for their area, the new Biodiversity Officers will advise the local authority

on biodiversity related issues and the authority's obligations in relation to protecting biodiversity. They will help local authorities to fully integrate biodiversity conservation into all of their policies, plans and actions, through training and provision of expert advice. Part of their role will also include mobilising community and other resources to tackle invasive species.

In addition, action on IAS will be included as a priority under the Local Authority Biodiversity Grant Scheme during the third RBMP cycle. An increased Community Water Fund operated by LAWPRO, which will allow community groups to apply for grant funding to undertake projects, including invasive species control projects, will also be delivered under the next RBMP.

In addition to the ongoing protection of our water bodies, the implementation of the above measures will lead to improvements in the quality of a number of water bodies currently impacted by IAS. The measures outlined, including the investment in local projects to support efforts to manage the spread of invasive species, will not only deliver in terms of water quality but also for biodiversity.

Invasive 1: Finalise legislation for the implementation of the EU Invasive Alien Species (IAS) Regulation (Timeframe – 2024).

Invasive 2: Implementation of existing management plans and Priority Pathway Action Plans (PPAP) for priority invasive species, and drafting of a new PPAP for Soils and Spoil [see www.invasives.ie].

Invasive 3: In support of the Catchment Management Work Plans, the NPWS will publish a Sectoral Action Work Plan, which will include for the implementation of existing management plans and Priority Pathway Action Plans (PPAP) for priority invasive species, and drafting of a new PPAP for Soils and Spoil.

Invasive 4: Complete negotiations on the recruitment of additional Biodiversity Officers.

The Programme for Government includes a commitment to ensure that each Local Authority has a sufficient number of Biodiversity Officers and Heritage Officers among their staff complement. The Biodiversity Officer Programme is being delivered by the Heritage Council, which is funded by the National Parks and Wildlife Service. There are currently 24 Biodiversity Officers in place in 20 local authorities, of which 16 are under the Heritage Council programme. A further five Biodiversity Officers will start under the Heritage Council programme in early 2024 with plans to have a Biodiversity Officer in each Local Authority by the end of 2024.

Invasive 5: Include action on Invasive Alien Species (IAS) as a priority under the Local Authority Biodiversity Grant Scheme. The Local Biodiversity Action Fund provides Local Authorities with funding to target actions in the National Biodiversity Action Plan. Projects that include the mapping and appropriate treatment of IAS are listed as priorities within this funding stream.

Invasive 6: Develop a National Management Plan for Invasive Alien Species, and bring to public consultation in early 2024.

13. Hazardous Chemicals in the Aquatic Environment

Hazardous chemicals including pesticides, pharmaceuticals and other synthetic substances are used in a wide range of common products ranging from household, industrial and agricultural applications. These substances can find their way into natural water through wastewater effluents, improper disposal, atmospheric deposition and run off from the land. The EPA's *Water Quality in Ireland Report 2016-2021* reported that 50% of the surface water bodies assessed failed to achieve good chemical status, when including failures for ubiquitous substances such as mercury and polyaromatic hydrocarbons (PAHs), which are already widely distributed in the environment due primarily to the combustion of fossil fuels. These substances can persist for decades even after their emissions have ceased and many are capable of long-range transport from their place of origin. When these substances are excluded from the assessment, 88% of water bodies assessed achieved good chemical status. It can be expected that the concentrations of these substances will fall as the sources are reduced.

Controls on these substances at EU and national level can be expected to be more appropriate than catchment specific remediation measures. Through Irelands National Hazardous Waste Management Plan 2021-2027, actions focussed on enhancing the prevention, collection and treatment of hazardous waste have been identified including programmes for promoting the use of less hazardous alternatives and the collection of household and farm hazardous waste. Ireland is a signatory of the Minimata Convention which promotes the phasing out of mercury in products and processes. The closure of peat power stations and introduction of bans on the combustion of smoky coals are also likely to result in a reduction of the levels of mercury and PAHs being deposited.

When ubiquitous substances are excluded from the assessment the chemical status failure rate decreases to 12% of water bodies. The information on chemical status is presented in this way to help identify those water bodies which are being impacted by non-ubiquitous substances likely to have come from local sources. These water bodies need measures to remove these substances from the environment. Measures to achieve environmental standards for these substances (cypermethrin, cadmium or lead) are more appropriate at the catchment or water body level.

The monitoring for priority substances has continued to evolve with a greater emphasis in the 2016-2021 period on targeted monitoring. The increase in the number of chemical status failures compared to previous years, is attributed to the fact that "the 2016-2021 monitoring programme included more targeted monitoring in areas where there are known or suspected sources of priority substances"[7].

Since the publication of the second RBMP in 2018, the requirements of the Environmental Quality Standards (EQS) Directive (2013/39/EU) have come into effect in Ireland. The revised environmental quality standards for a number of priority substances, and the list of new priority substances have been incorporated into the relevant legislation and are now being monitored as part of the WFD compliance monitoring programme. In addition, the Watch List of emerging pollutants continues to be updated and monitored nationally to determine whether they are present in natural waters and whether they require increased controls. Furthermore, Ireland will work with the European Commission on their proposal to amend the Water Framework Directive and the EQS Directive and Groundwater Directive to update the lists of pollutants and quality standards therein. This work aims to better protect our citizens and our water bodies against hazardous chemicals.

Pesticides

Control of pesticides used in agriculture and forestry are key elements of ensuring Ireland maintains good chemical status in as many water bodies as possible. As outlined in the latest EPA Water Quality Report, just over 10% of failures in water bodies were due to the presence of pesticides and herbicides, mainly heptachlor and cypermethrin. Heptachlor is no longer used as an insecticide but cypermethrin continues to be used in forestry and agriculture. A new measure around the handling, use and disposal of sheep dip (which contains cypermethrin) has been added to the Programme of Measures on foot of the EPA report findings, which aims to protect water quality from its toxic impacts.

7 EPA Water Quality in Ireland Report 2016-2021 https://www.epa.ie/publications/monitoring--assessment/freshwater--marine/water-quality-in-ireland-2016--2021-summary-report.php

Furthermore, in 2020, 33 drinking water supplies had pesticide concentrations above the required standard and of those exceedances, two-thirds were attributed to the presence of MCPA[8], an herbicide used in the control of rushes in grassland. This continues a declining trend in the number of pesticide exceedances in drinking waters. However, efforts must continue to ensure the appropriate controls are applied to pesticide storage and use with a view to maintaining this positive trend and ultimately eliminate pesticide exceedances in drinking water. The National Pesticides and Drinking Water Action Group (NPDWAG) is chaired by DAFM and includes representatives from the EPA, Uisce Éireann, local authorities, LAWPRO, the farming community and pesticide manufacturers and suppliers. This group works together to raise awareness of the need to use pesticides responsibly. Implementation of the new Drinking Water Directive provides the opportunity to learn from and build on the successful collaborative work of the Action Group in protecting sources of drinking water being contaminated by hazardous substances more generally (see Section 11 – Drinking Water Source Protection). The publication of an Interim Pesticides Strategy by Irish Water (*now Uisce Éireann*) provides a risk management framework which is made up of three key pillars – (i) collaboration (ii) understanding risk and (iii) managing risk[9], and seeks to further limit the impact of pesticide use on our drinking water supplies.

The National Aquatic Environmental Chemistry Group

The National Aquatic Environmental Chemistry Group (NAECG), chaired by the EPA, was established in 2018 to bring a more strategic and forward-looking approach to the management of hazardous chemicals and to provide a forum for maintaining national expertise on hazardous chemicals in the aquatic environment. The group brings together experts in the monitoring, assessment and management of hazardous chemicals from many of the national agencies whose remits depend on having an understanding of the source, fate (including monitoring) and impact of chemicals in the water environment.

During the second RBMP the NAECG completed a review of Ireland's list of 16 River Basin Specific Pollutants (RBSPs), which were originally established in 2010, to determine if they were still appropriate in an Irish context. The review identified a number of substances, which could be considered for removal from the list and suggested that the Environmental Quality Standards (EQS) for a number of other substances should be reviewed. The group also carried out further work to identify potential new substances, which may be of concern and may need to be added to the list of RBSPs, taking account of monitoring data generated by national agencies across Ireland, available usage and importation data as well as data modelling. Over the next two years the NAECG will undertake a scoping (monitoring) study at locations across Ireland, representative of water body types and typical pressures, to determine the presence, or otherwise, of these candidate substances. Where substances are detected at levels of concern, the NAECG will undertake further work to assign EQSs to these new substances with the aim of developing a new list of RBSPs for inclusion in updated legislation in 2023.

In looking toward future work activities during the third-cycle plan, the NAECG will undertake a scoping study to investigate the establishment of a national, central data repository for all relevant water chemistry data for use as a national resource in future projects on water chemistry. Separately, the NAECG may play a greater role in contributing to the development of national strategies and policies involving water chemistry in Irish water bodies. In addition, the NAECG will contribute to a project to develop revised Environmental Quality Standards (EQS) for the protection of designated shellfish waters.

The following sets out the principal actions for the third-cycle with regard to control of hazardous chemicals in the aquatic environment:

HazChem 1: DHLGH will amend the EQS Regulations to take account of the assessment of River Basin Specific Pollutants (RBSPs) by the National Aquatic Environmental Chemistry Group (NAECG)

HazChem 2: DHLGH and EPA will input into the recently commenced EU work to revise the list of Priority Substances and Priority Hazardous Substances. This will include liaison with the EU Commission in relation to the proposed amendments to the EQS Directive.

HazChem 3: Teagasc, ASSAP and DAFM, with support from LAWPRO, will implement specific actions in high risk catchments to protect water quality from toxic impacts arising from the handling, use and disposal of sheep dip.

8 EPA 'Drinking Water Quality in Public Supplies 2020'. https://www.epa.ie/publications/compliance--enforcement/drinking-water/annual-drinking-water-reports/87838-EPA-Public-Report-2020-full-File-revised.pdf

9 'Irish Water Interim Pesticide Strategy: A collaborative approach with catchment stakeholders'. https://www.water.ie/docs/IW-AMT-STR-010-Exernal.pdf

14. Aquaculture

Aquaculture is a significant water management issue in terms of both the potential impacts from fin-fish farming on water quality and in terms of the need to protect shellfish production areas from land-based pollutant emissions.

Stakeholders raised concerns during the Significant Water Management Issues (SWMI) and draft River Basin Management Plan consultation process in relation to the potential impacts on water quality from the aquaculture industry. Concerns related to the effectiveness of the overall licensing process in assessing the impact of aquaculture activities on the water environment. Aquaculture is licensed under the Fisheries (Amendment) Act, 1997, the Foreshore Act 1933 and applicable National and EU legislation, including EU environment protection directives. While the sector is subject to authorisation, greater transparency regarding the environmental impact and performance assessments of the sector was called for.

Water quality and finfish farming

The potential impact from finfish farming includes 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. Monitoring and compliance programmes for these activities are in place with reports available on the Department of Agriculture, Food and the Marine's website. EPA and Marine Institute monitoring and assessment data suggests that aquaculture areas are having an impact on ecological status in 7 water bodies: 6 rivers and 1 transitional.

Licences are granted following consideration of the likely effects on the environment of the proposed operations. When the Minister for Agriculture, Food and the Marine grants a licence, it is subject to conditions. The licensing process also involves consultation with a wide range of scientific and technical advisers as well as various statutory consultees including the Department of Housing, Local Government and Heritage and Uisce Éireann. The legislation also provides for a period of public consultation.

A review of aquaculture licence processing including new and renewal applications commenced following the 2007 adverse ruling of the Court of Justice of the European Union against Ireland, on implementation of the Birds and Habitats Directive. This effectively stalled the licensing of aquaculture in Ireland until Appropriate Assessments could be carried out on aquaculture licence applications in Natura 2000 sites. The assessment of both cumulative and in-combination (with other activities) effects on WFD and Habitats Directive objectives forms part of the aquaculture licencing advice from the Marine Institute to the DAFM in the licencing process.

Environmental assessment reports such as Appropriate Assessments are available online alongside licence application forms and information on current licences. DAFM is continuing to improve the aquaculture licensing system including greater ease of access to information for stakeholders.

Through consultation with DHLGH, the current review of the National Strategic Plan for Sustainable Aquaculture Development and the recently published communication from the EU Commission regarding '*Strategic guidelines for a more sustainable and competitive EU aquaculture for the period 2021 to 2030'*, provides an opportunity to improve the links with the Water Framework Directive. In this regard the Aquaculture and Foreshore Management Division within DAFM will;

1. Seek to improve access to information through the launch of an online mapping viewer of licensed aquaculture sites in Ireland which will link to licence information already available online.
2. Review the opportunities to strengthen the links between the Aquaculture licensing process and the objectives of the WFD in consultation with the Department of Housing, Local Government and Heritage.
3. DAFM will consider the current aquaculture licensing guidelines update the process/ guidelines, if required.

Protecting shellfish production areas

Shellfish production areas need to be protected so that the quality of the shellfish waters adequately supports shellfish life and growth. The environment in which shellfish grow affects both their viability, and their quality as a food source for human consumption.

Shellfish areas include the areas of aquatic habitat used for bivalve and gastropod molluscs, including oysters, mussels, cockles, scallops and clams where these are harvested for human consumption.

There are 60 shellfish production areas in Ireland based on the 2023 annual review of classifications.

The Water Framework Directive (WFD) would maintain the same protection to shellfish waters as the original Shellfish Waters Directive that was repealed in 2013.

To protect shellfish water, Ireland must

1. designate waters that need protection in order to support shellfish life and growth
2. set physical, chemical and microbiological requirements that designated shellfish waters must either comply with or try to improve
3. establish pollution reduction programmes for the designated waters

The potential for contamination of shellfish arising from land-based activities was highlighted during the public consultation.

To future protect Shellfish Waters in Ireland, DHLGH will review the designation of shellfish waters in Ireland. This will include consideration of monitoring, assessment and protection measures. This process will involve:

1. A review, and where necessary an update, of the quality standards that shellfish waters must meet to ensure adequate protection of the habitat for shellfish. The review will include consideration of synergies between monitoring and assessments carried out for the WFD and Food Safety legislation in terms of physical, chemical and microbiological elements. A particular focus will be given to the numerical standards for microbial monitoring.
2. Make amendments to regulations to provide for the review and confirmation of existing shellfish waters designations and the designation of new shellfish waters by the Minister for Housing, Local Government and Heritage.

Measures to address aquaculture pressures and protect shellfish areas

Aqua 1: *Review of consents causing impacts:* DAFM will conduct a periodic review and, where necessary, update of controls contained in aquaculture consents. [Timeframe – 2024]

Aqua 2: *Enhanced integration of WFD into Aquaculture Consents***:** DAFM to enhance links between the aquaculture authorisation and the objectives of the Water Framework Directive. [Timeframe – 2024]

Aqua 3: *Online Aquaculture licensing:* To encourage the active involvement of all interested parties DAFM is to launch an online mapping viewer of licensed aquaculture sites in Ireland including access to licence and licence application information [Timeframe – 2024]

Aqua 4: *Enhanced Protection for Designated Shellfish Production Areas*: DHLGH will examine the need for amendments to legislation and whether a new management framework for shellfish waters in Ireland is needed. [Timeframe – 2026]

Aqua 5: Complete the National Strategic Plan for Sustainable Aquaculture, including water quality measures.

15. Land Use Planning

The River Basin Management Planning process recognises the need for alignment and integration with the planning system in order to ensure effective water management and compatibility between planned growth and environmental sustainability, both through plan making at a strategic level and in relation to careful consideration of individual applications for planning permission.

Among the actions identified in the second-cycle River Basin Management Plan (RBMP) was the delivery of guidelines for planning authorities on the relationship between physical planning and river basin management planning. A public consultation on the draft planning guidelines will be undertaken as soon as possible to provide stakeholders with the opportunity to comment prior to finalisation.

These guidelines will provide planning authorities with clear direction on how to consider the risk that proposed plans or developments will pose to achieving the objectives of the Water Framework Directive. They will set out how strategic level forward planning and development planning can prevent future development from inadvertently causing deterioration in water quality or impacting the physical condition of water bodies, while also supporting the delivery of improvements to our water environment, as required by the Water Framework Directive. This can be done through the River Basin Management Planning process by taking the outputs from the RBMP process and both interpreting and adapting them into policies and actions that can be implemented through the development plan and development management frameworks.

Following the public consultation process and publication of the final guidelines, a comprehensive training course on implementing the new guidelines will be designed and delivered for practitioners.

The development of guidelines and provision of training to practitioners will provide the planning authorities with a suite of tools to facilitate the determination of the potential impact of development (from development plans to individual development projects) on the WFD status of a water body. These tools will facilitate the following aims:

- Avoidance of inappropriate development in or near water bodies, which may risk the achievement of the WFD's environmental objectives or the conservation of WFD protected areas.
- Ensure the effective management of risks from new development permitted near water bodies that may risk the achievement of the WFD's environmental objectives or the conservation of WFD protected areas.
- Ensure best practice sustainable water quality management for all new development.
- Improve the understanding of the RBMP process and its objectives among planning authorities, applicants, their agents and the public.
- Ensure that the consideration of WFD requirements is proportionate to the plan level, risk, scale, nature and location of development proposed.
- Provide practical steps and methods to ensure that relevant development plans are consistent with the RBMP and the requirements of the WFD.
- Provide practical steps and methods to ensure planning decisions take account of risks and avoid or mitigate the adverse effects of inappropriate development on WFD objectives.
- Identify mitigation measures to avoid deterioration in surface and groundwater status, which can be built into the design stage of projects that are within or close to such waters.
- Outline the procedures relating to exemptions from the default environmental objectives established within the WFD [under Article 4(7)].

These guidelines will introduce a comprehensive mechanism for supporting the delivery of WFD objectives and improving our water environment as required by the RBMP, through all levels of the planning process. This will ensure a consistent approach is adopted throughout the country to give effect to the new water and planning legislative proposals. This legislation will also enable the identification and management of developments where exemptions from adherence to the Water Framework Directive [Article 4(7)] may be necessary in the case of proposed sustainable development.

These measures will facilitate the development of further guidelines, jointly by the Department of Housing, Local Government and Heritage and the City and County Management Association on a strategy for the implementation of Nature-based Solutions (Sustainable Urban Drainage Systems) on a national basis. There are clear linkages between improved surface water management using a Nature-based solution and the reversal in decline of status in

receiving water bodies. The Department of Housing, Local Government and Heritage published a best practice interim guidance document[10] in advance of further guidelines entitled, 'Nature-based Solutions to the Management of Rainwater and Surface Water Runoff in Urban Areas'.

There will be a reliance on Local Authorities and other Competent Authority resources to manage the Water Framework Directive assessments as part of the statutory planning process. The ability of these Competent Authorities to resource and manage these assessments will be considered as part of review of the wider Local Authority structures.

Land-Use 1: Finalise guidelines for the incorporation of the Water Framework Directive into the planning system and roll out of training on the new water and planning guidelines to practitioners.

Land-Use 2: Legislative provision to give effect to the new Water and Planning Guidance to be progressed.

10 https://www.gov.ie/en/publication/10d7c-nature-based-solutions-to-the-management-of-rainwater-and-surface-water-runoff-in-urban-areas-best-practice-interim-guidance-document/

www.gov.ie/RBMP

Department of Housing,
Local Government and Heritage



Rialtas na hÉireann
Government of Ireland

Rialtas na hÉireann
Government of Ireland

Water Action Plan 2024

A River Basin Management Plan for Ireland

Appendix 2: Programme of Measures - List of Measures

Prepared by the Department of Housing, Local Government and Heritage

www.gov.ie/RBMP

Contents

1. The Importance of Protecting our Natural Water . . . 3
2. Status of Ireland's Water Bodies . . . 5
3. Setting Environmental Objectives . . . 5
4. Measures Required . . . 11
5. Programme of Measures to 2027 . . . 11
Agriculture . . . 16
Physical modifications to the flow, form or function of natural surface water bodies (Pressures on Hydromorphology) . . . 25
Forestry . . . 34
Urban Wastewater . . . 43
Urban Runoff Pressures . . . 49
Domestic Wastewater Discharges (Septic Tanks) . . . 52
Unknown Pressures . . . 54
Other Pressures . . . 55
Peatlands . . . 57
Industry, Mines & Quarries . . . 62
Drinking Water Source Protection . . . 63
Invasive Alien Species . . . 65
Hazardous Chemicals in the Aquatic Environment . . . 68
Aquaculture . . . 70
Land-Use Planning . . . 71
Protecting and Restoring Estuarine and Coastal Waters . . . 72
6. Implementation and Governance . . . 73
7. Public and Stakeholder Engagement . . . 83
8. Economic Analysis . . . 84

1. The Importance of Protecting our Natural Water

Action 1.1	**Integrated catchment management approaches will be used to identify and decide on further specific measures for each water body, where they are required in addition to those set in this plan. These will be included in the 46 Catchment Management Work Plans, which will be used to locate measures within each catchment. The co-benefits of water-focused measures on climate and biodiversity will also be identified.**				
Steps Necessary for Delivery	**Proposed Output**	**Timeline**	**Lead Org**	**Stakeholder Support**	**Resources/Risks/Dependencies**
Coordination of the Sectoral Action Work Plans and subsequent CM Work Plans	Coordinated approach to the preparation of the CM Work Plans	Ongoing	LAWPRO	All Sectors / DHLGH / AFU / EPA	Engagement by all sectors. Adequate resources in place.
Each Sector to include proposed measures within the Sectoral Action Work Plan	List of proposed measures included in the sectoral action work plans and then in the specific catchment management work plan	Q4 2024	Each Sector	LAWPRO / DHLGH / AFU / EPA	Engagement by all sectors. Adequate resources in place.
Measures implemented by each sector to be reported at least at a water body scale	List of measures implemented in each water body by sector	Ongoing as implemented	Each Sector	LAWPRO / DHLGH / AFU / EPA	Engagement by all sectors. Adequate resources in place. Data management system in place to capture implemented measures.
Action 1.2	**The Catchment Management Work Plans will include the list of water bodies, their associated status, significant pressures/issues and targeted measures, along with outcomes-based targets for the third-cycle and key performance indicators to monitor progress and outcomes. Justification for water bodies not meeting their WFD objective by 2027 should also be included in catchment management plans, in line with Article 4 of the WFD.**				
Steps Necessary for Delivery	**Proposed Output**	**Timeline**	**Lead Org**	**Stakeholder Support**	**Resources/Risks/Dependencies**
Coordination of the preparation of the 46 CMWP through Regional Committees	46 Management Work Plans (CMWP) prepared	Ongoing	LAWPRO	DHLGH / EPA / LAs / An Fóram Uisce / Regional Committees / Project Delivery Office	Adequate resources in place for LAWPRO and coordination aspects of CMWP. Meaningful engagement by stakeholders
Dissemination of the Catchment Management Work Plans template to enable content provision by implementing bodies and community input over time	Template disseminated	Q4 2024	LAWPRO	EPA	Adequate resources in place for LAWPRO and coordination aspects of CMWP

Implementing bodies to provide Work Programmes / Action Plans/ Local Authority Water Action Plans (in the required format) for online reporting in the 46 Catchment Management Work Plans (CMWPs)	CMWP	Ongoing	All implementing bodies including LAs	LAWPRO / EPA / Project Delivery Office / CCMA / Regional Committees / NTIG	Data available in useable format. Data management system developed. Data sharing in place. Resourcing limitations of implementing bodies
Implementing bodies to provide Action Plan Implementation data annually (in the required format) for online reporting in the 46 Catchment Management Work Plans (CMWPs)	Implementation progress tracking	Ongoing	All implementing bodies including LAs	LAWPRO / EPA / Project Delivery Office	Data available in useable format. Data management system developed. Data sharing in place to allow effectiveness of measure to be evaluated. Resourcing limitations of implementing bodies
Action 1.3	**Sectoral Action Work Plans will be developed. They will set out the actions to be taken by the relevant authorities in line with their legally binding general duties under Article 3(1) of the 2003 Water Policy Regulations (SI 722 of 2003).**				
Steps Necessary for Delivery	**Proposed Output**	**Timeline**	**Lead Org**	**Stakeholder Support**	**Resources/Risks/Dependencies**
POMs WG re-established	Bi-lateral meetings with each sector	Q2 2024	DHLGH	EPA / LAWPRO / All Sectors	Timely engagement by all sectors. Adequate resources in place.
Template development	Template with key elements	Q3 2024	DHLGH	LAWPRO / AFU	Engagement by all sectors. Adequate resources in place.
Engagement by each Sector to prepare Sectoral Action Work Plan	Sectoral Action Work Plans	Q1 2025	Each Sector Lead	LAWPRO / DHLGH / AFU / EPA	Engagement by all sectors. Adequate resources in place.
Action 1.4	**When developing new policy, Government Departments will have regard to the OECD principles for policy coherence to consider cross-cutting issues; trade-offs and synergies with other key policy objectives.**				
Steps Necessary for Delivery	**Proposed Output**	**Timeline**	**Lead Org**	**Stakeholder Support**	**Resources/Risks/Dependencies**
Consideration of OECD principles for policy coherence during development of new policies	New policies implemented with regards to OECD principles	Ongoing	Whole of Govt.	All relevant Govt. Departments	

2. Status of Ireland's Water Bodies

Action 2.1	The DHLGH shall continue to engage with counterparts in Northern Ireland via the North/South Water Framework Directive Co-ordination Group as is necessary to ensure coordination of programmes of measures across the whole of shared river basin districts.				
Steps Necessary for Delivery	**Proposed Output**	**Timeline**	**Lead Org**	**Stakeholder Support**	**Resources/Risks/Dependencies**
Engagement with North/South Water Framework Directive Co-ordination Group	Coordination of programmes of measures to assist in delivering water quality benefits in shared river basin districts	Ongoing	DHLGH	DAERA / NIEA / EPA / North South Ministerial Council	
Action 2.2	**A collaborative 'Shared Waters' document will be published following publication of the River Basin Management Plans of the Republic of Ireland and Northern Ireland.**				
Steps Necessary for Delivery	**Proposed Output**	**Timeline**	**Lead Org**	**Stakeholder Support**	**Resources/Risks/Dependencies**
Engagment with DAERA / NIEA	Agreed template for document	Q4 2023	DHLGH (WAU)	DAERA / NIEA / EPA / LAWPRO	
Agreement of final text	Publication of document	Q3 2024	DHLGH (WAU)	DAERA / NIEA / EPA / LAWPRO	

3. Setting Environmental Objectives

Action 3.1	DHLGH will arrange for the development and application of a methodology for the screening and application of WFD Article 4(5) exemptions, extending the deadline for compliance beyond 2027, where justified in accordance with the strict criteria stipulated within the Directive.				
Steps Necessary for Delivery	**Proposed Output**	**Timeline**	**Lead Org**	**Stakeholder Support**	**Resources/Risks/Dependencies**
DHLGH will commission the development and application of a methodology for the screening and application of WFD Article 4(5) exemptions	Methods document. Recommendations for exemptions based on the application of the methodology	Q4 2024 - Q4 2025	DHLGH	Other relevant government departments and state bodies	Access to appropriate expertise, availability of best practice methods and support from competent state body expertise
Action 3.2	**DHLGH will review and update the Climate Adaptation Plan for the Water Quality and Water Infrastructure Sectors.**				
Steps Necessary for Delivery	**Proposed Output**	**Timeline**	**Lead Org**	**Stakeholder Support**	**Resources/Risks/Dependencies**
Consultation with stakeholders on suggested changes required to strengthen the plan	Suggested amendments to the current plan	Q1 2024	DHLGH (WAU)		

Drafting of updated plan based on review of current Adaptation Plan for the water sectors with input from key stakeholders	Updated Sectoral Adaptation Plan for the Water Quality and Water Services Infrastructure sectors for Ministerial Approval	Q3 2024	DHLGH (WAU)		
Publication of Updated Sectoral Adaptation Plan for the Water Quality and Water Services Infrastructure sectors	Adaptation Plan for the Water Quality and Water Services Infrastructure sectors published	Q4 2024	DHLGH (WAU)		
Action 3.3	**LAWPRO will co-ordinate a simplified climate change sensitivity analysis or "climate check" which will be undertaken in line with EU Guidance during the third RBMP cycle at the level of the Catchment Management Work Plans. The check will also inform the setting of RBMP environmental objectives for the following fourth-cycle.**				
Steps Necessary for Delivery	**Proposed Output**	**Timeline**	**Lead Org**	**Stakeholder Support**	**Resources/Risks/Dependencies**
LAWPRO to engage with implementing bodies on the development of an agreed process for carrying out a 'Climate Check'	Agreed process for carrying out a 'Climate Check'	Q2 2025	LAWPRO	Relevant Bodies / EPA	
Measures to be climate checked as part of SEA/AA process for capital projects	Recommendations from SEA/AA to be implemented	Ongoing	LAWPRO	Relevant Bodies	
Carry out climate checks on measures	Confirmation that measures will be resilient to the effects of climate change	Ongoing	LAWPRO	Relevant Bodies	
LAWPRO to report to Programme Delivery Office on climate checks conducted on measures	Monitoring and reporting on outcome of climate checks	Ongoing	LAWPRO	Relevant Bodies / EPA	
Action 3.4	**The EPA will review the national monitoring programme and integrate climate change considerations such as identifying water bodies likely to be most vulnerable to climate change and detecting the direct impacts of climate change.**				
Steps Necessary for Delivery	**Proposed Output**	**Timeline**	**Lead Org**	**Stakeholder Support**	**Resources/Risks/Dependencies**
EPA to examine parameters for inclusion in WFD monitoring programme	Appropriate parameters identified and included in WFD monitoring programme	Q2 2026	EPA		

Action 3.5	Support additional research and pilot projects in the area of climate change in Ireland (impacts and adaptation).				
Steps Necessary for Delivery	**Proposed Output**	**Timeline**	**Lead Org**	**Stakeholder Support**	**Resources/Risks/Dependencies**
Support NFGWS pilot project to enable rural communities combat climate change and enhance biodiversity through community owned drinking water supplies	Pilot scheme to run in a minimum of 30 GWS, and enable the schemes to introduce climate change and biodiversity initiatives	2021-2024	DHLGH (WAU) / NFGWS		
Support the Nature-based surface water management implementation strategy	Implementation of publicly funded projects for public realm enhancement and active travel with a view to bring learning across every relevant sector to provide greater climate resilience in terms of water management, greener urban environments, addressing heat island effects, place making as well as other multiple benefits including protecting and improving water quality	2022 - 2027	DHLGH / LAWPRO / CCMA	Local Authorities / EPA / IFI / NPWS / OPW	
Action 3.6	**The National Bathing Water Expert Group to undertake a research project to determine the most suitable approach to protecting bathers' health outside of the current bathing season.**				
Steps Necessary for Delivery	**Proposed Output**	**Timeline**	**Lead Org**	**Stakeholder Support**	**Resources/Risks/Dependencies**
Completion of research to support policy development for 'out of season' bathing in Ireland	Report on the research to include: (i) summary of study findings in terms of monitoring and communication and management 'out of season'. (ii) Recommendations to inform policy development for 'out of season' bathing in Ireland (iii) guidance document for bathers	Q1 2024	DHLGH (WAU)	Members of the BWEG. Irish Water Safety / HSE / Uisce Éireann / EPA / Coast Watch / Local Authorities / CCMA	Consultant support for DHLGH to deliver research outputs
Publication of guidance for bathers, including a simple risk assessment tool on what to consider before bathing	Guidance note for bathers	Q1 2024	DHLGH (WAU)	EPA	As above

Action 3.7	**DHLGH will amend the existing Bathing Water Regulations (S.I. No. 79 of 2008) to facilitate local authorities defining the length of the "bathing season" on determining the bathing season for individual bathing waters in respect of the "bathing waters" within their jurisdiction. DHLGH will also consider the research outcomes and recommendations from the National Bathing Water Expert Group. The outcome of the EU regulatory fitness and performance programme (REFIT) review of the Bathing Water Directive will be assessed in due course.**				
Steps Necessary for Delivery	**Proposed Output**	**Timeline**	**Lead Org**	**Stakeholder Support**	**Resources/Risks/Dependencies**
Amendment to the existing Bathing Water Regulations (S.I. No. 79 of 2008)	Amended Regulations	Q4 2024	DHLGH	National Bathing Water Expert Group	
Assessment of the impact of amending the existing Bathing Water Regulations (S.I. No. 79 of 2008), taking account of: the outcomes and recommendations of the National Bathing Water Expert Group, and (2) the EU regulatory fitness and performance programme (REFIT) review of the Bathing Waters Directive	Proposed follow up action	Q4 2024	DHLGH	National Bathing Water Expert Group	Such a change in regulations may have a detrimental impact on the BW classification of WFD protected areas
Further actions	Depends on the above assessment	TBC	TBC	TBC	TBC
Assessment of the outcome of the EU regulatory fitness and performance programme (REFIT) review of the Bathing Water Directive	TBC	TBC	TBC	TBC	TBC
Action 3.8	**The water-related requirements of water-dependant habitats and species will be reviewed by the Water Division, the National Parks and Wildlife Service and the EPA during the third RBMP cycle, taking account of the most recent scientific evidence. If necessary, proposals for updating the related water standards will be made and this will be integrated into the catchment management process.**				
Steps Necessary for Delivery	**Proposed Output**	**Timeline**	**Lead Org**	**Stakeholder Support**	**Resources/Risks/Dependencies**
Review of the water-related requirements of water-dependant habitats and species will be undertaken based on the most up to date scientific evidence	Completed review. If and where appropriate, recommendations for updating supporting water related water standards	Q1-Q4 2025	DHLGH (NPWS & Water Division) and EPA	Other relevant state bodies and research institutions	Availability of relevant and robust state-of-the art research evidence and outputs

Action 3.9	**The National Parks and Wildlife Service and the Water Division, both of this Department, and other relevant stakeholders will continue to engage closely in the catchment management planning process as it relates to Freshwater Pearl Mussel to ensure conformity with the requirements of the Habitats Directive and the Water Framework Directive.**				
Steps Necessary for Delivery	**Proposed Output**	**Timeline**	**Lead Org**	**Stakeholder Support**	**Resources/Risks/Dependencies**
Engage with LAWPRO in the catchment management planning process to ensure that requirements of the Habitats Directive and the Water Framework Directive are included	Catchment management plans that include provision for the protection of the Freshwater Pearl Mussel where needed	Ongoing	DHLGH / NPWS	LAWPRO	
Action 3.10 (also relevant to hydromorphology section)	**The Minister for Housing, Local Government and Heritage will undertake a short public consultation before deciding whether to designate or de-designate water bodies as HMWBs. There were 466 water bodies, which the EPA has found to meet the criteria for designation. The Minister will take into account the recommendations of the EPA and the key concerns raised in the submissions to the consultation process.**				
Steps Necessary for Delivery	**Proposed Output**	**Timeline**	**Lead Org**	**Stakeholder Support**	**Resources/Risks/Dependencies**
Finalise the list of water bodies that have been proposed for HMWB designation on the basis of information supplied by stakeholders	Draft list of water bodies proposed for HMWB designation	Q3 2024	DHLGH	Uisce Éireann / OPW / EPA	Capacity within DHLGH to progress
Public consultation on proposed list of water bodies for HMWB designation	Public consultation process	Q3 2024	DHLGH	EPA	Capacity within DHLGH to progress
Post-consultation, the list of HMWBs for designation will be finalised, taking into account the recommendations of the EPA and any key concerns raised during the public consultation process	Final list of HMWBs for designation	Q4 2024	DHLGH	EPA	Capacity within DHLGH to progress

Action 3.11 (also relevant to hydromorphology section)	**A review of arterial drainage requirements and the underpinning Arterial Drainage Act will be undertaken in order to inform future land use policy decisions arising out of the Land Use Review and to support the preparations for the implementation of the new Nature Restoration Law and the Heavily Modified Water Body review process.**				
Steps Necessary for Delivery	**Proposed Output**	**Timeline**	**Lead Org**	**Stakeholder Support**	**Resources/Risks/Dependencies**
Assess and advise on the implications of different land use policy options in the future arising out of the Land Use Review on arterial drainage requirements and the consequential impacts (both positive and negative) on social, economic, climate, biodiversity and water status objectives and outcomes	Report and recommendations	TBC	DECC / DHLGH (Water Policy & WAU) / DAFM / OPW	Members of the National Hydromorphology Expert Group	Complexities and the capacity within DHLGH and across relevant public bodies to progress
Assessing and advising on the legislative changes to the Arterial Drainage Act necessary to (1) support the national land use policy objectives arising out of the Land Use Review, and (2) ensure that future arterial drainage practices are sustainable and support the environmental objectives set out in the 2021 Climate Action Plan, the WFD River Basin Management Plan, the National Biodiversity Action Plan and the related Nature Restoration Law, as well as flood risk management objectives		TBC	DECC / DHLGH (Water Policy & WAU) / DAFM / OPW	Members of the National Hydromorphology Expert Group	Complexities and the capacity within DHLGH and across relevant public bodies to progress

4. Measures Required

Action 4.1	The EPA and LAWPRO, with the support of the implementing bodies and other stakeholders, will continue to assess the impacts of pressures on waters to inform the measures that are needed.				
Steps Necessary for Delivery	**Proposed Output**	**Timeline**	**Lead Org**	**Stakeholder Support**	**Resources/Risks/Dependencies**
Undertake initial catchment characterisation assessment	Assessment of pressures impacting on waters	Ongoing	EPA	LAWPRO / Local Authorities	
Undertake further characterisation in water bodies that are At Risk of not achieving their objectives	Assessment of actions needed to restore water quality and referrals to implementing bodies to carry out appropriate actions	Ongoing	LAWPRO	Local Authorities / implementing bodies & stakeholders / EPA	

5. Programme of Measures to 2027

Action 5.1	The Department of Housing, Local Government and Heritage will oversee an independent review of progress with the implementation of the Programme of Measures.				
Steps Necessary for Delivery	**Proposed Output**	**Timeline**	**Lead Org**	**Stakeholder Support**	**Resources/Risks/Dependencies**
Programme Delivery Office	Staffing and resources provided	Q2 2024	DHLGH (WAU)		
Oversight and coordination of the implementation of the programme of measures	Programme Delivery Office to engage with relevant stakeholders	Ongoing	DHLGH (WAU)	EPA / LAWPRO / LAs / Implementation bodies	
Report from Programme Delivery Office to NCMC on implementation of high level measures	Progress report as standing item on NCMC meeting agenda	Ongoing	DHLGH (WAU)	EPA	
Report from Regional Management Committees to NCMC on implementation of water body level measures	Progress report as standing item on NCMC meeting agenda	Ongoing	Regional Management Committees	DHLGH (WAU) / LAWPRO / EPA	
NTIG to forward issues/matters to NCMC for clarification/further advice	Issues/matters from NTIG as standing item on NCMC agenda	Ongoing	NTIG	EPA / LAWPRO	

Report from NCMC to WPAC on implementation of measures	Progress report as standing item on WPAC meeting agenda	Ongoing	NCMC	DHLGH (WAU)	
Catchment Forum meetings held in the 46 catchments	Updates on implementation of measures to the public. Seek agreement and recommendations for consideration by implementing bodies	Ongoing	LAWPRO	Implementing Bodies / EPA	
WPAC, NCMC and Regional Management Committees to continually review the progress in the implementation of measures	Progress reports on implementation	Ongoing	DHLGH (WAU)	EPA / LAWPRO / WPAC / NCMC / Regional Committees	
Mid-term progress review	Identification of additional, evidence based measures to address identified gaps	Q2 2025	DHLGH (WAU)	EPA / LAWPRO / WPAC / NCMC / Regional Committees	
Action 5.2	**The National Technical Implementation Group will identify the issues preventing water quality objectives from being achieved and will identify any further evidence, legislative, policy or implementation gaps that need to be addressed.**				
Steps Necessary for Delivery	**Proposed Output**	**Timeline**	**Lead Org**	**Stakeholder Support**	**Resources/Risks/Dependencies**
Establishment of topic based working groups as necessary	Identification of any evidence, legislative, policy or implementation gaps which need to be addressed with the aim of enhancing the protection of water quality and preventing declines	Ongoing	EPA	NTIG members	
Action 5.3	**LAWPRO will confirm significant pressures and work with implementing bodies and stakeholders to promote the implementation of appropriate restoration measures in each Area for Action (restoration) where environmental objectives are not being met.**				
Steps Necessary for Delivery	**Proposed Output**	**Timeline**	**Lead Org**	**Stakeholder Support**	**Resources/Risks/Dependencies**
LAWPRO carries out local catchment assessment in each priority area for action (PAA)	Referrals for implementation of measures to ASSAP and implementing bodies. Provision of the scientific evidence base uploaded to the WFD app	2023-2027		Regional Committee members	Adequate resources in place for LAWPRO
ASSAP and implementing bodies action the referrals for implementation of measures	Implementation of measures to improve WQ	2023-2027		LAWPRO / ASSAP Oversight Committee	Risk of inaction by responsible body/pressure owner
Local Authorities carry out local catchment assessment/inspections in Areas for Action (AfAs)	Identification of local pressures on water quality. Provision of the scientific evidence base uploaded to the WFD app	2023-2027		LAWPRO / CCMA	Adequate resources in place for LAs

Local Authorities work with relevant agencies to action the local measures required to address the pressures identified	Implementation of measures to improve WQ	2023-2027		Regional Committees	Adequate resources in place for LAs Risk of inaction by responsible body/pressure owner Effective enforcement where necessary
NFGWS prepares a drinking water source protection plan for public health areas for restoration	Identification of risks to DW source	2023-2027		Regional Committees	
NFGWS actions the restoration measures identified in the source protection plan	Implementation of measures to protect the DW source	2023-2027		Regional Committees	
LAWPRO carries out local catchment assessment in Priority Blue Dot Areas for Restoration	Referrals for implementation of measures to ASSAP and implementing bodies. Provision of the scientific evidence base uploaded to the WFD app	2023-2027		Regional Committees	Adequate resources in place for LAWPRO
ASSAP and implementing bodies action the referrals for implementation of measures in Priority Blue Dot Areas for Restoration	Implementation of measures to improve WQ	2023-2027		LAWPRO / ASSAP Oversight Committee	Risk of inaction by responsible body/pressure owner
Commencement of Catchment Management and Catchment Sectoral Plans	Implementation of Catchment Management and Catchment Sectoral Plans	Q2 2024 and every year thereafter		LAWPRO / EPA / Regional Committees	Adequate resources in place for LAWPRO and coordination aspects of CMWP
Action 5.4	**LAWPRO will confirm significant pressures and work with implementing bodies and stakeholders to progress the implementation of appropriate protection measures in areas that are meeting their environmental objectives but require protection to ensure that water quality does not deteriorate.**				
Steps Necessary for Delivery	**Proposed Output**	**Timeline**	**Lead Org**	**Stakeholder Support**	**Resources/Risks/Dependencies**
Local Authorities carry out local catchment assessment/inspections and implement planning and regulatory controls in Areas for Action (AfAs) with a Protect objective	Protection Plans for AFAs	Q4 2025	LAWPRO	Local Authorities/ Regional Committees/ CCMA	Adequate LA resources to be provided

NFGWS prepares a drinking water source protection plan for public health areas for protection	DW source protection plan with protect measures to be actioned	Q4 2027	NFGWS	Regional Committees	
LAWPRO to prepare a template Protection Plan for Blue Dot Areas and roll out to all Blue Dots that are meeting their environmental objectives	Protection Plan for Blue Dots	Q4 2027	LAWPRO	LAs and Regional Committees / Blue Dot Steering Committee	Adequate resources for LAWPRO
Action 5.5	**LAWPRO, in cooperation with the EU LIFE IP Waters of LIFE project team, will publish a new Blue Dot Programme work plan for waters with a High Status Objective.**				
Steps Necessary for Delivery	**Proposed Output**	**Timeline**	**Lead Org**	**Stakeholder Support**	**Resources/Risks/Dependencies**
Blue Dots specific section in the template designed for the catchment management plans, to include work programmes/ action plans from implementing bodies with the greatest significant pressures on Blue Dots	Agreed template for Pilot Catchment Management Work Plans	Q4 2022	LAWPRO	EPA / All implementing bodies / Blue Dot Catchments Programme Steering Group	Long term resourcing of Blue Dot Programme. LAWPRO resource to deliver the template and coordination aspects of CMWP. Resourcing limitations of implementing bodies
Blue Dot section in each of the 46 Catchment Management Work Plans	46 Management Work Plans prepared	Q4 2024	LAWPRO	DHLGH / EPA / LA's / An Fóram Uisce / Regional Committees/ DHLGH Project Delivery Office / Blue Dot Catchments Programme Steering Group	Adequate resources in place for LAWPRO and coordination aspects of CMWP
Pilot community fora to inform the development and supports needed for local level initiatives specifically for Blue Dot waters	Recommendations on developments and supports required	Q4 2023	LAWPRO	Community Fora	Adequate resources in place for LAWPRO

Restoration and protection measures advanced in all Areas for Action with Blue Dots	Implementation of measures to improve WQ. Protection Plan which may include LCA assessment, inspection activities, enforcement action and planning controls	Q4 2027	Regional Committees / Local authorities	LAWPRO / Blue Dot Catchments Programme Steering Group.	Risk of inaction by responsible body/pressure owner. LA resource to be provided
Waters of LIFE Integrated Project to support the implementation of measures to protect and enhance High-Status Waters and thus to support the work of the Blue Dot Catchments Programme	Building technical understanding and capacity in relation to the design and implementation of measures. Promoting community and landowner ownership of the actions. Making recommendations that will inform the development of future agri-environment and forestry policies and provide for the long-term sustainable management of high-status areas	Q2 2028	DHLGH	LAWPRO / EPA / DAFM / Teagasc / Coillte / OPW / Forest Service / Local Development Companies. Waters of LIFE Steering Group. Blue Dot Catchments Programme Steering Group	Risk of inaction by responsible body/pressure owner. Technical learnings and innovations are developed. Poor integration of learnings from the project into mainstream policies and interventions including capacity, training, resources and enforcement.
Blue Dot Catchments Programme Communications and Engagement Plan implementation	Generate awareness amongst key audiences regarding the quality of our Blue Dot waters, focusing firstly on the key sectoral stakeholders who have the most impact on Blue Dots and on communities within Blue Dot catchments. Turn awareness into engagement and action, in the form of stewardship of Blue Dot waters	Ongoing	LAWPRO	Blue Dot Steering Group / Waters of LIFE IP / All relevant implementing bodies	Long term resourcing of Blue Dot Programme for measures, animation and activation of communities and implementing bodies
Action 5.6	**Catchment projects aimed at improving water quality to be advanced in 15 areas (including community initiatives, Rivers Trusts, EIPs, PEACE+)**				
Steps Necessary for Delivery	**Proposed Output**	**Timeline**	**Lead Org**	**Stakeholder Support**	**Resources/Risks/Dependencies**
Current Catchment Projects that will contribute to WFD water quality objectives	Include work programme for the project in the CMWP with appropriate reporting on implementation	Q1 2023	Catchment Project lead organisation	LAWPRO / Regional Committees	Meaningful engagement by Catchment Project
Addition of Catchment Projects during the lifetime of the RBMP	Revision of list	Ongoing	Project Delivery Office	LAWPRO	Meaningful engagement by Catchment Project

Agriculture

Agri 1	**DHLGH and DAFM will oversee the implementation of the stronger and more targeted Nitrates Action Programme. The Fifth Nitrates Action Programme (2022-2025) retains and strengthens the existing controls from agricultural nutrient impacts on water and will implement tighter controls on nitrogen and phosphorus inputs by:** **1) Stipulating tighter controls on the timing and methods of application of chemical nitrogen fertilisers and slurry.** **2) Reducing the annual maximum fertilisation rate of nitrogen on grassland by 10% in 2022 with potential for a further reduction of, at least, 5% in 2024 following the Interim Review in 2023.** **3) Reduction in the maximum derogation stocking rate on farms in water bodies where there is, or a risk of, declining water quality.** **4) Implementing a livestock excretion banding system from Q1 2023 to more accurately reflect the different rates of organic nitrogen loading from different sized animals in the maximum stocking rate calculations.** **5) Establishing a national fertiliser sales database for farmers.**				
Steps Necessary for Delivery	**Proposed Output**	**Timeline**	**Lead Org**	**Stakeholder Support**	**Resources/Risks/Dependencies**
Undertake Interim Review of the Fifth Nitrates Action Programme and implement any required additional measures	Report on water quality assessment (2020-2022) and new measures if required put into effect through an amendment to the Good Agricultural Practice Regulations	Q3 2024	DHLGH (WAU)	DAFM / EPA / Teagasc	Administration support
Fifth Nitrates Action Programme Implementation Review	Review of the implementation of the Fifth Nitrates Action Programme and recommendation on new measures	Q4 2024	EPA	DHLGH / DAFM / LAWPRO / Teagasc including ASSAP / local authorities	Administration support
Publication of draft Sixth Nitrates Action Programme for consultation	Draft Nitrates Action Programme	Q2 2025	DHLGH (WAU)	DAFM / EPA / Teagasc	Administration support
Publication of Sixth Nitrates Action Programme	Nitrates Action Programme	Q4 2025	DHLGH (WAU)	DAFM / EPA / Teagasc	Administration support
Introduce new Good Agricultural Practice Regulations to put the 6th NAP into effect	New Good Agricultural Practices (GAP) Regulations	Q4 2025	DHLGH (WAU)	DAFM	Administration support

Scope out policy on a national fertiliser sales database to include legal advice and consultation with a wide variety of stakeholders	Consultation on national fertiliser sales database policy concluded	Q4 2022	DAFM	Fertiliser manufacturers/ importers / retailers / agricultural contractors / farm advisors service and the farm organisations are all involved in Stakeholder Consultative Committee. Cross-departmental and Government support will be required to enact primary legislation	Primary legislation required Functioning IT system required
Introduce a National Fertiliser Sales Database	Introduce a National Fertiliser Sales Database	Q1 2023	DAFM	All fertiliser traders and end users as well as farm advisory service	Primary legislation required Functioning IT system required
Develop an industry-led initiative to reduce agricultural impacts on water quality. Working group to look at options for driving nitrogen reductions at both national and catchment scales.	Proposals to address: • improvements in slurry management, • compliance with GAP Regs requirements, • N reductions, • improved Communications / knowledge transfer programme, and • behavioural change around slurry storage.	Q3 2023	DSI	Industry	

Agri 2	**Local Authorities will strengthen the inspection and enforcement relating to agricultural diffuse pollution.** **A total of 57 new Inspectors in local authorities have been allocated for the National Agricultural Inspection Programme (NAIP) and five new staff have been allocated to the EPA to oversee the programme. An additional four staff have been allocated to LAWPRO to help in co-ordinating the activity and avoiding duplication where possible. Inspections will be targeted and risk-based using all the available evidence, including water quality data, the EPA's PIP Maps and the Targeting Agricultural Measures Map on up to 4,500 farms per annum during the lifetime of the Nitrate Action Programme.** **DAFM will undertake 500-1,000 inspections per year under the GAP Regulations focused in Q1 where risk of nutrient impact on water quality is high. DAFM has increased their derogation inspections from 5% to 10% of all derogation farms per year and will undertake approximately 700 inspections per annum.**				
Steps Necessary for Delivery	**Proposed Output**	**Timeline**	**Lead Org**	**Stakeholder Support**	**Resources/Risks/Dependencies**
Develop initial risk based plan for local authority agricultural inspections and enforcement using water quality information including EPA PIP maps to target action	An initial plan for the National Agricultural Inspection Programme covering 2023 to include strengthened enforcement activity and recording/ tracking of inspection and enforcement activity	Q1 2023	EPA/NIECE	DHLGH / LAs / DAFM / LAWPRO / ASSAP	Administration support
Develop a risk based National Agricultural Inspection Programme for local authorities using water quality information including EPA PIP maps to target action, and build on the learning from 2023	Plan for National Agricultural Inspection Programme covering 2024 with emphasis on follow-up and enforcement, annual reporting and tracking of activity undertaken by the Programme	Q4 2023	EPA/NIECE	DHLGH / LAs / DAFM / LAWPRO / ASSAP	Administration support
For the Sixth Nitrates Action Programme develop a National Agricultural Inspection Programme for 2026-2029 following review of the Fifth NAP and public consultation on the draft sixth NAP	Plan for National Agricultural Inspection Programme (2026-2029)	Q4 2025	EPA/NIECE	DHLGH / LAs / DAFM / LAWPRO / ASSAP	
Develop a risk based National Agricultural Inspection Programme for local authorities using water quality information including EPA PIP maps to target action, and build on the learning from 2024	Plan for National Agricultural Inspection Programme covering 2025 with emphasis on follow-up and enforcement, annual reporting and tracking of activity undertaken by the Programme	Q4 2024	EPA/NIECE	DHLGH / LAs / DAFM / LAWPRO / ASSAP	Administration support

Local authorities to undertake inspections, enforcement and reporting as outlined in the National Agricultural Inspection Programme and cross report to DAFM where non compliances are identified	To undertake inspections on approximately 4,500 farms per annum and follow up inspection/enforcement/ cross reporting/reporting targets as specified by the EPA in each iteration of the National Agricultural Inspection Programme	Annual	Local Authorities	EPA / NIECE / DHLGH / DAFM / LAWPRO / ASSAP	Administration support Functioning data management system required Guidance and training required
A data management system will be developed in an incremental and phased manner to capture and track the National Agricultural Inspections Programme. This system will be designed to be integrated with other WFD data systems	Initial phase of data management system	Q4 2024	EPA/NIECE	Local Authorities / CCMA / DHLGH	Administration support
Guidance will be developed for local authority staff undertaking inspections as part of the National Agricultural Inspection Programme	Guidance document	Q2 2023	EPA/NIECE	DHLGH / LAs / DAFM / LAWPRO / ASSAP	Administration support
Training will be developed for the National Agricultural Inspection Programme	Training course material developed	Q3 2023	EPA/NIECE	DHLGH / LAs / DAFM / LAWPRO / ASSAP	Administration support
Training will be provided for local authority staff and others undertaking inspections under the GAP Regulations including DAFM and Inland Fisheries Ireland personnel undertaking inspections	Training courses will be delivered	Q4 2023	EPA/NIECE Local Authorities / LANTG / LAWPRO	DHLGH / DAFM / ASSAP	Administration support
Agri 3	**DAFM will implement Ireland's CAP Strategic Plan with a strong emphasis on the achievement of a higher level of environmental ambition. This includes implementing the new Green Architecture of (1) Conditionality, (2) Pillar I Eco-Schemes and (3) the Pillar II Interventions such as ACRES and the new Water EIP.**				
Steps Necessary for Delivery	**Proposed Output**	**Timeline**	**Lead Org**	**Stakeholder Support**	**Resources/Risks/Dependencies**
Develop and finalise appropriate interventions under Ireland's CAP Strategic Plan	CAP Strategic Plan to be published with policies and interventions to support water quality	Q1 2023	DAFM	DHLGH and other government departments	Impact achieved under voluntary schemes will depend on farmer uptake and the implementation of suitable measures in appropriate locations

Delivery of the CSP Eco-scheme which aims to reward farmers for undertaking actions beneficial to climate, environment, biodiversity and water quality	Implementation of suitable measures to support the protection of water quality as well as climate, environment and biodiversity	Timeline for all measures / schemes under CSP will run for the duration (i.e. up to 2027)	DAFM	DHLGH and other government departments	Impact achieved under the eco-scheme is voluntary and hence will depend on farmer uptake and the implementation of suitable measures in appropriate locations
Delivery of the CSP ACRES Cooperation Projects in pre-defined high-priority geographical areas, including high status objective water bodies	Implementation of targeted and bespoke farm and landscape measures, identified through results based assessments/ scorecards, and aimed at improving biodiversity and water	Timeline for all measures / schemes under CSP will run for the duration (i.e. up to 2027)	DAFM	DHLGH and other government departments	Impact achieved will depend on farmer uptake and the implementation of suitable measures in the most effective locations
Delivery of the CSP ACRES General through priority access, e.g. Tier 1 includes farms in high status catchments Tier 2 includes farms located near vulnerable water bodies	Implementation of suitable measures to support the protection of water quality as well as climate, environment and biodiversity	Timeline for all measures / schemes under CSP will run for the duration (i.e. up to 2027)	DAFM	DHLGH and other government departments	Impact achieved will depend on farmer uptake and the implementation of suitable measures in the most effective locations
Agri 4	**Eco-scheme measures will contribute to the protection of water quality. DAFM will promote and target the uptake of these measures in locations at farm level where they will maximise water protection. This will be achieved through training and farm advisory services and by using the Pollution Impact Potential (PIP) maps generated by the EPA.**				
Steps Necessary for Delivery	**Proposed Output**	**Timeline**	**Lead Org**	**Stakeholder Support**	**Resources/Risks/Dependencies**
Delivery of advisor training and promotion and use of EPA PIP maps	Advisors trained to target the right measure in the right place	Timeline for all measures / schemes under CSP will run for the duration (i.e. up to 2027)	DAFM	DHLGH and other government departments	Impact achieved will depend on advice given, farmer uptake and the implementation of suitable measures in appropriate locations

Agri 5	**The Water EIP project led by LAWPRO, in partnership with Teagasc and Dairy Industries Ireland will focus on reducing losses of phosphorus, nitrogen, sediment and, where relevant, pesticides to water from agricultural lands by promoting the adoption of innovative best practice in nutrient management, the application of Nature-based Solutions and other suitable measures. The project will aim to support up to 15,000 farmers in implementing on-farm water protection and mitigation measures.**				
Steps Necessary for Delivery	**Proposed Output**	**Timeline**	**Lead Org**	**Stakeholder Support**	**Resources/Risks/Dependencies**
Development and delivery of a European Innovation Partnership (EIP) for water	The establishment of a national scale EIP project specifically focussed on water protection and restoration	Timeline for all measures / schemes under CSP will run for the duration (i.e. up to 2027)	LAWPRO	DAFM / DHLGH and other government departments	Impact achieved will depend on farmer uptake and the implementation of suitable measures in appropriate locations
Delivery of the 'Farming for Water' EIP which aims to support farmers in implementing on-farm water protection and mitigation measures	Implementation of suitable measures to support the protection of water quality as well as climate, environment and biodiversity	Timeline for all measures / schemes under CSP will run for the duration (i.e. up to 2027)	LAWPRO / ASSAP / DII	DAFM / DHLGH and other government departments	Impact achieved will depend on farmer uptake and the implementation of suitable measures in appropriate locations
Agri 6	**DHLGH and DAFM will put arrangements in place to ensure independent assessments and reviews of the efficacy of the Nitrates Action Programme (NAP), the CAP Strategic Plan and the Water EIP (and other relevant measures) to bring the 1,000 water bodies impacted by agriculture up to good status and to prevent deterioration. They will identify additional measures, where necessary, which will be implemented during the lifetime of the plan or beyond, where justified under Article 4 of the WFD.** **Mechanisms for review will include; DHLGH monitoring & assessment of progress with the programme of measures, EPA's statutory role in assessing the NAP, EPA research projects and the CAP Strategic Plan Performance Monitoring and Evaluation Framework (PMEF).**				
Steps Necessary for Delivery	**Proposed Output**	**Timeline**	**Lead Org**	**Stakeholder Support**	**Resources/Risks/Dependencies**
Review and assessments to be completed	Additional measures identified where necessary	2025	DHLGH	DAFM / EPA / LAWPRO	
Agri 7	**In support of the Catchment Management Work Plans, the Department of Agriculture, Food and the Marine will publish an Agricultural Sectoral Action Work Plan to reduce nitrogen losses to waters in areas where levels are increasing or are too high, and to bring nitrogen, phosphorous and sediment losses to water from agricultural sources within sustainable levels by 2027.**				
Steps Necessary for Delivery	**Proposed Output**	**Timeline**	**Lead Org**	**Stakeholder Support**	**Resources/Risks/Dependencies**
Engagement with POMs WG	Agreement on the development of template for Sectoral Action Work Plans and the CM Work Plans	Q2 2024	DAFM	LAWPRO / DHLGH / EPA	Engagement by POMs WG members. Adequate resources available.

Plan Development: Review of 2024 Agricultural Work Plans including water body scale actions for the development of the Sectoral Action Work Plan template and for use in the pilot Catchment Management Work Plans	To inform the Sectoral Action Work Plan template and CM Work Plan template and data for input into the pilot CM Work Plan	Q2-Q3 2024	DAFM	LAWPRO / DHLGH / EPA	Agreement on the relevant data to be collated. Full participation by different implementing bodies and projects in Agriculture sector. Data available in useable format. Data management system developed. Data sharing arrangements in place.
Plan Development: Data collation of relevant work plan items and proposed measures on national basis including targets (annual or multi-annual data 2025-2027)	Sectoral Action Work Plan and data for input into the CM Work Plans	Q1 2025	DAFM	LAWPRO / DHLGH / EPA	Agreement on the relevant data to be collated. Full participation by different implementing bodies and projects in Agriculture sector. Data available in useable format. Data management system developed. Data sharing arrangements in place.
Implementation Tracking: Annual reporting of implementation of measures per catchment	Catchment implementation recorded and accessible via data management system to the public	Q1-Q2 2026 (interim assessment)	DAFM	LAWPRO / DHLGH / EPA	Implementation data available in a timely manner and at catchment scale. Data management system in place.
Implementation Tracking: Annual reporting of implementation of measures per catchment	Catchment implementation recorded and accessible via data management system to the public	Q1-Q2 2027 (3rd Cycle outcomes)	DAFM	LAWPRO / DHLGH / EPA	Implementation data available in a timely manner and at catchment scale. Data management system in place.

Agri 8	**Online Farm Sustainability Planning: Teagasc will develop an online Farm Sustainability Plan for farmers complementing existing Nutrient Management Planning online tool to support the wider Agricultural Knowledge and Information Systems (AKIS) programme.**				
Steps Necessary for Delivery	**Proposed Output**	**Timeline**	**Lead Org**	**Stakeholder Support**	**Resources/Risks/Dependencies**
Tool design and development	User ready farm sustainability tool	Q3 2023	Teagasc	DAFM / Software developers	Team of 4 Programmers assigned to project and Approved for development. Require some input from LAWPRO / EPA to integrate components e.g. Referral process / reporting
Pilot tool with advisors/farmers	Refine tool based on feedback	Q4 2023	Teagasc	DAFM / DII	ASSAP team – Current resource allocation should mean low risk
Launch	Final version of farm sustainability tool ready for widespread use	Q1 2024	Teagasc		Approach will involve continual ongoing development.
Agri 9	**Extend and expand the local authorities' water protection office. LAWPRO will be extended for the full duration of Cycle 3 up to 2027. The CCMA will identify the appropriate level of resources and involvement of LAWPRO to meet WFD objectives up to 2027 and beyond in future RBMPs.**				
Steps Necessary for Delivery	**Proposed Output**	**Timeline**	**Lead Org**	**Stakeholder Support**	**Resources/Risks/Dependencies**
Internal review of LAWPRO	Report and recommendations	Q4 2021	LAWPRO	DHLGH	
Agri 10	**Provide free on-farm advice to farmers. The sustainability advisory service (ASSAP) will be extended for the full duration of Cycle 3. The dairy industry has increased the number of advisors involved in ASSAP by six for the period 2022 to 2027.**				
Steps Necessary for Delivery	**Proposed Output**	**Timeline**	**Lead Org**	**Stakeholder Support**	**Resources/Risks/Dependencies**
Consideration of the ASSAP Review Report Recommendations	Proposals for expansion of ASSAP Programme and associated outputs	Q3 2023	DHLGH / DAFM/ Dairy Industry	Teagasc / LAWPRO	Administration Support
Agri 11	**To support the goal of targeting the right measure in the right place all farm advisers involved in the 'Farming for Water' Agri-EIP, will be provided with ongoing professional development, including an appropriate level of catchment science training to ensure that measures are sufficiently targeted.**				
Steps Necessary for Delivery	**Proposed Output**	**Timeline**	**Lead Org**	**Stakeholder Support**	**Resources/Risks/Dependencies**
Delivery of relevant training to advisors in support of the "Farming for Water" Agri-EIP	Provision of training courses	Ongoing	LAWPRO / Teagasc	DII	Administration support and availability of trainers

Agri 12	Upskill farmers and advisors to ensure they have the knowledge and tools to implement appropriate measures to reduce the impact on water quality and freshwater biodiversity from farming practices.				
Steps Necessary for Delivery	**Proposed Output**	**Timeline**	**Lead Org**	**Stakeholder Support**	**Resources/Risks/Dependencies**
Delivery of derogation courses to farmers	Provision of training courses	On-going	Teagasc / ACA / Farm Advisors	DAFM	Farmers are required to have completed training courses, without which they will be rejected from nitrates derogation. Any new derogation applicant must complete training course and will require resources from advisors to provide the course – list of those farmers who have completed courses is sent to DAFM and DAFM must maintain a record
Delivery of relevant training to advisors and farmers in support of future environmental schemes & programmes e.g. ACRES CP and ACRES general	Provision of training courses. Training courses have been provided in 2022, 2023 & 2024 on ACRES for all advisors and only those advisors that have completed training can develop ACRES plans. Each ACRES participant must complete 1 compulsory training course with the option of additional voluntary courses	As per scheme / programme requirements	DAFM	Teagasc and ACA	Training courses have been provided in 2022, 2023 & 2024 on ACRES for all advisors and only those advisors that have completed training can develop ACRES plans

Physical modifications to the flow, form and/or function of natural surface water bodies (Pressures on Hydromorphology)

Hymo 1	A Hydromorphology Expert Group will be established to support the new National Hydromorphology Programme. This Expert Group will identify interim measures which will be readily implemented during the third RBMP cycle to assist in removing pressures on hydromorphology.				
Steps Necessary for Delivery	**Proposed Output**	**Timeline**	**Lead Org**	**Stakeholder Support**	**Resources/Risks/Dependencies**
Establishment of a national Hydromorphology Expert Group Advise the Minister on the structure of an appropriate regulatory framework/regime	Established Expert Group Work Programme New regulatory regime	End of Q2 2024 End of Q3 2024 Dependent on the scoping	DHLGH (WAU)	Hydromorphology Expert Group: DECC / IFI / OPW / DAFM / EPA / Uisce Éireann / Waterways Ireland / CCMA / LAWPRO / Teagasc / ESB Internal: NPWS / WAU / Water Policy Unit / EUIPR	Complexities and the capacity within DHLGH and across relevant public bodies to progress
Hymo 2	**DHLGH will lead the development of a new enhanced and consolidated legislative regime to address pressures on the physical condition of waters.**				
Steps Necessary for Delivery	**Proposed Output**	**Timeline**	**Lead Org**	**Stakeholder Support**	**Resources/Risks/Dependencies**
Draft a framework for controlling pressures on hydromorphology and engage/consult with the public and stakeholders on it	Publish framework Public consultation	TBC	DHLGH (WAU)	Hydromorphology Expert Group: DECC / IFI / OPW / DAFM / EPA / Uisce Éireann / Waterways Ireland / CCMA / LAWPRO / Teagasc / ESB Internal: NPWS / WAU / Water Policy Unit / EUIPR	Complexities and the capacity within DHLGH and across relevant public bodies to progress
Legislate and implement	New bill/amendments to existing legislation	Q4 2026	DHLGH (WAU) and other departments with responsibility for relevant legislation		

Hymo 3	IFI will establish a restoration programme to mitigate the negative impact of past construction in or near water bodies.				
Steps Necessary for Delivery	**Proposed Output**	**Timeline**	**Lead Org**	**Stakeholder Support**	**Resources/Risks/Dependencies**
Agreement across government (principally DECC and DHLGH) to develop a single restoration/ mitigation programme designed to meet Water Framework Directive, Habitats Directive and Biodiversity Strategy objectives	A single restoration / mitigation programme to be led and managed by IFI	Q1 2024	DHLGH / DECC / IFI	Hydromorphology Expert Group: DECC / IFI / OPW / DAFM / EPA / Uisce Éireann / Waterways Ireland / CCMA / LAWPRO / Teagasc / ESB Internal: NPWS / WAU / Water Policy Unit / EUIPR	Administrative support from DHLGH (WAU) Financial: DHLGH to co-fund IFI resources (with DECC) for 2023 Joint application to be made by DHLGH and DECC to the new Infrastructure, Climate and Nature Fund (2026 – 2030), once established, for additional funding.
Development of a long-term Plan for mitigation of all problem barriers identified as part of IFI's Barrier Assessment	Prioritisation plan for barriers to be mitigated during the period of the 3rd Cycle RBMP	Q4 2024	IFI		Funding: co-funding arrangement between DHLGH and DECC for additional resources to facilitate IFI's barrier mitigation plan (for the 3rd Cycle
IFI to establish new Barriers Mitigation Division	New IFI division	2023 / 2024 (in progress)	IFI	DECC & DHLGH	Financial: DHLGH to co-fund IFI resources (with DECC) for 2023 Subject to the provision of further resources will augment this division in 2024 and beyond to manage the barriers works programme. Initial Target Capital Budget to be secured at minimum of €50m through the new Infrastructure, Climate and Nature Fund (2026-2030)

Remove/modify approximately 10% of problem barriers	Barrier removal/modification	2022-2027	IFI	DECC & DHLGH	Financial: DHLGH to co-fund IFI resources (with DECC) for 2024/2025. Thereafter, funding through the new Infrastructure, Climate and Nature Fund (2026-2030) is anticipated. Risk: Delays within the planning system
Hymo 4	**A Sectoral Action Work Plan for Hydromorphology will be developed, which will include measures and plans to address the 448 water bodies at risk from pressures on hydromorphology, including barriers, channelization, drainage, sediment and flood protection. It will be led and coordinated by DHLGH with supporting bodies IFI, DAFM, Forestry, OPW and DECC.**				
Steps Necessary for Delivery	**Proposed Output**	**Timeline**	**Lead Org**	**Stakeholder Support**	**Resources/Risks/Dependencies**
Engagement with POMs WG	Agreement on the development of the template for Sectoral Action Work Plans and the CM Work Plans	Q2 2024	DHLGH	IFI / DAFM / Forestry / OPW / DECC / LAWPRO / LA / EPA	Engagement by POMs WG members. Adequate resources available.
Plan Development: Review of 2024 Hydromorphology Work Plans including water body scale actions for the development of the Sectoral Action Work Plan template and for use in the pilot Catchment Management Work Plans	To inform the Sectoral Action Work Plan template and CM Work Plan template and data for input into the pilot CM Work Plan	Q3 2024	DHLGH	IFI / DAFM / Forestry / OPW / DECC / LAWPRO / LA / EPA / ESB	Agreement on the relevant data to be collated. Full participation by different implementing bodies and projects in pressures on hydromorphology. Data available in useable format. Data management system developed. Data sharing arrangements in place

Plan Development: Data collation of relevant work plan items and proposed measures on national basis including targets (annual or multi-annual data 2025-2027)	Sectoral Action Work Plan and data for input into the CM Work Plans	Q1 2025	DHLGH	IFI / DAFM / Forestry / OPW / DECC / LAWPRO / LA / EPA	Agreement on the relevant data to be collated. Full participation by different implementing bodies and projects in hydromorphology sector. Data available in useable format. Data management system developed. Data sharing arrangements in place
Implementation Tracking: Annual reporting of implementation of measures per catchment	Catchment implementation recorded and accessible via data management system to the public	Q1-Q2 2026 (interim assessment)	DHLGH	IFI / DAFM / Forestry / OPW / DECC / LAWPRO / LA / EPA	Implementation data available in a timely manner and at catchment scale. Data management system in place.
Implementation Tracking: Annual reporting of implementation of measures per catchment	Catchment implementation recorded and accessible via data management system to the public	Q1-Q2 2027 (3rd Cycle outcomes)	DHLGH	IFI / DAFM / Forestry / OPW / DECC / LAWPRO / LA / EPA	Implementation data available in a timely manner and at catchment scale. Data management system in place.
Hymo 5	**It is proposed that IFI will lead a multi-agency whole of catchment pilot project on the River Dodder from source to sea with the aim of examining the feasibility of opening up this heavily urbanised catchment to migratory fish species by mitigating the five most significant barriers in the lower reaches and progressing to the next stage, as appropriate.**				
Steps Necessary for Delivery	**Proposed Output**	**Timeline**	**Lead Org**	**Stakeholder Support**	**Resources/Risks/Dependencies**
Stakeholder engagement, feasibility studies, tendering for consultant support/physical works, completion of barrier mitigation works	Mitigation of barriers on the River Dodder	2024 – 2027	IFI	DHLGH / DECC	Recruitment of IFI's new Barrier Mitigation team. Risk: Delays within the planning system

Hymo 6	**IFI will lead a pilot project to be undertaken for the Annacotty Weir in County Limerick. The project will provide an opportunity to test a collaborative and ecology focussed design approach. It will also test enhanced community engagement opportunities that go beyond the standard consultation practices involved in the planning process, thereby assisting with the design and implementation of the national restoration programme. The pilot project is initially examining the feasibility of mitigation and will progress to the next stages, as appropriate.**				
Steps Necessary for Delivery	**Proposed Output**	**Timeline**	**Lead Org**	**Stakeholder Support**	**Resources/Risks/Dependencies**
Deliver the feasibility study to outline the preferred option for the mitigation of the barrier at Annacotty	A documented national process for the establishment of the most appropriate Barrier Mitigation Measure	2022 – 2024	IFI	OPW / ESB / LAWPRO / LC&CC / Local stakeholders	Stakeholder acceptance, consent from Local Authority
Design generic tender documents and processes for the specification of consultancy services to deliver consent and contract documents for similar type barrier mitigation projects	Development of generic tender documents and processes to support barrier mitigation projects	2024	IFI	Interagency working group	Finance: dependent on outcome of National Barrier Mitigation Funding Plan (2024 – 2027) Dependent on new barriers team input
Design standard survey and monitoring protocols to determine the metrics necessary to assess the success of barrier mitigation projects	Pilot project to be used to develop, evaluate and document measures of success (KPI) for barrier mitigation projects	2024	IFI	Interagency working group	Dependent on new barriers team and IFI research collaboration
Completion of barrier mitigation works at Annacotty	Establishment of measures for the documentation of improved hydromorphology outcomes	2025	IFI	OPW / ESB / LC&CC	Funding required

Hymo 7	**Implementation of the roadmap of actions, including the use of state-of-the-art technical solutions, to improve fish migration in the lower Shannon at the Hydroelectric scheme located around Parteen and Ardnacrusha. The pilot project will initially examine the feasibility of mitigation and will progress to the next stages, as appropriate.**				
Steps Necessary for Delivery	**Proposed Output**	**Timeline**	**Lead Org**	**Stakeholder Support**	**Resources/Risks/Dependencies**
New fish pass at Parteen Weir	New fish pass at Parteen Weir	2027	DHLGH (WAU)	External: IFI / EPA / OPW / Waterways Ireland / LAWPRO / Uisce Éireann / Shannon Fisheries Partnership / Salmon Watch Ireland / ESB Internal: NPWS / WAU	Administrative support by DHLGH (WAU). Consultant support to be tendered for. Co-funding agreement with ESB to be finalised. Partial funding through the new Infrastructure, Climate and Nature Fund (2026-2030) is anticipated.
Eflow study programme	Determination of Eflows	2024 - 2026	DHLGH (WAU)	External: IFI / EPA / OPW / Waterways Ireland / LAWPRO / Uisce Éireann / Shannon Fisheries Partnership / Salmon Watch Ireland / ESB Internal: NPWS / WAU	Administrative support by WAU. Consultant support to be tendered for. Co-funding agreement with ESB to be finalised.
Feasibility study for tailrace barrier	Tailrace barrier recommendations	End 2025	DHLGH (WAU)	External: IFI / EPA / OPW / Waterways Ireland / LAWPRO / Uisce Éireann / Shannon Fisheries Partnership / Salmon Watch Ireland / ESB Internal: NPWS / WAU	Administrative support by WAU. Consultant support to be tendered for. Co-funding agreement with ESB to be finalised.

Downstream fish pass feasibility study	Downstream fish passage recommendations	End 2025	DHLGH (WAU)	External: IFI / EPA / OPW / Waterways Ireland / LAWPRO / Uisce Éireann / Shannon Fisheries Partnership / Salmon Watch Ireland / ESB Internal: NPWS / WAU	Administrative support by WAU. Consultant support to be tendered for. Co-funding agreement with ESB to be finalised.
New fish pass feasibility study at Ardnacrusha	Recommendations for fish pass feasibility at Ardnacrusha	End 2025	DHLGH (WAU)	External: IFI / EPA / OPW / Waterways Ireland / LAWPRO / Uisce Éireann / Shannon Fisheries Partnership / Salmon Watch Ireland / ESB Internal: NPWS / WAU	Administrative support by WAU. Consultant support to be tendered for. Co-funding agreement with ESB to be finalised.
Lower Shannon Management Plan agreed subject to public consultation	Lower Shannon Management Plan	End 2025	DHLGH (WAU)	External: IFI / EPA / OPW / Waterways Ireland / LAWPRO / Uisce Éireann / Shannon Fisheries Partnership / Salmon Watch Ireland / ESB Internal: NPWS / WAU	Administrative support by WAU. Consultant support to be tendered for. Co-funding agreement with ESB to be finalised.
Continuation of project Steering Group to oversee implementation of the roadmap	Oversight of implementation of roadmap	Ongoing to project end	DHLGH (WAU)	External: IFI / EPA / OPW / Waterways Ireland / LAWPRO / Uisce Éireann / Shannon Fisheries Partnership / Salmon Watch Ireland / ESB Internal: NPWS / WAU	Administrative support by WAU.

Procurement of expert consultancy support to manage the implementation of the roadmap under the Steering Group	Implementation of roadmap	Ongoing until completion of roadmap	DHLGH (WAU)	External: IFI / EPA / OPW / Waterways Ireland / LAWPRO / Uisce Éireann / Shannon Fisheries Partnership / Salmon Watch Ireland / ESB Internal: NPWS / WAU	Administrative support by WAU. Co-funding agreement with ESB to be finalised
Hymo 8	**A proposed pilot project on the Slaney River at Clohamon will aim to improve fish passage at a medium scale hydroelectric scheme through a state and community collaborative initiative. The pilot project will initially examine the feasibility of mitigation and will progress to the next stages, as appropriate.**				
Steps Necessary for Delivery	**Proposed Output**	**Timeline**	**Lead Org**	**Stakeholder Support**	**Resources/Risks/Dependencies**
Stakeholder engagement, feasibility studies, tendering for consultant support/physical works, completion of barrier mitigation works.	Mitigation of the barriers at Clohamon on the River Slaney	2024 – 2027	IFI	Slaney Rivers Trust and DHLGH / DECC	Co-funding agreement with the Slaney Rivers Trust to be finalised. Partial funding through the new Infrastructure, Climate and Nature Fund (2026-2030) is anticipated. Recruitment of IFI's new Barrier Mitigation team. Risk: Delays within the planning system
Hymo 9	**In addition to river barrier removal and mitigation other restoration and mitigation work will be developed. This will be partly guided by the framework for prioritising measures for both river restoration and Nature-based Catchment Management prepared by the EPA.**				
Steps Necessary for Delivery	**Proposed Output**	**Timeline**	**Lead Org**	**Stakeholder Support**	**Resources/Risks/Dependencies**
Initial scoping and identification of other pressures on hydromorphology on water status	Report with recommendations	2024-2025	DHLGH (WAU)	External: IFI / EPA / OPW / Waterways Ireland / LAWPRO / Uisce Éireann / Shannon Fisheries Partnership / Salmon Watch Ireland / ESB Internal: NPWS / WAU	Complexities and the capacity within DHLGH and across relevant public bodies to progress

Action 3.10 repeat (as above)	**The Minister for Housing, Local Government and Heritage will undertake a short public consultation before deciding whether to designate or de-designate water bodies as HMWBs. There were 466 water bodies, which the EPA has found to meet the criteria for designation. The Minister will take into account the recommendations of the EPA and the key concerns raised in the submissions to the consultation process.**				
Steps Necessary for Delivery	**Proposed Output**	**Timeline**	**Lead Org**	**Stakeholder Support**	**Resources/Risks/Dependencies**
Finalise the list of water bodies that have been proposed for HMWB designation on the basis of information supplied by stakeholders	Draft list of water bodies proposed for HMWB designation	Q3 2024	DHLGH	Uisce Éireann / OPW / EPA	Capacity within DHLGH to progress
Public consultation on proposed list of water bodies for HMWB designation	Public consultation process	Q3 2024	DHLGH	EPA	Capacity within DHLGH to progress
Post-consultation, the list of HMWBs for designation will be finalised, taking into account the recommendations of the EPA and any key concerns raised during the public consultation process	Final list of HMWBs for designation	Q4 2024	DHLGH	EPA	Capacity within DHLGH to progress
Action 3.11 repeat (as above)	**A review of arterial drainage requirements and the underpinning Arterial Drainage Act will be undertaken in order to inform future land use policy decisions arising out of the Land Use Review and to support the preparations for the implementation of the new Nature Restoration Law and the Heavily Modified Water Body review process.**				
Steps Necessary for Delivery	**Proposed Output**	**Timeline**	**Lead Org**	**Stakeholder Support**	**Resources/Risks/Dependencies**
Assess and advise on the implications of different land use policy options in the future arising out of the Land Use Review on arterial drainage requirements and the consequential impacts (both positive and negative) on social, economic, climate, biodiversity and water status objectives and outcomes	Report and recommendations	TBC	DECC / DHLGH (Water Policy & WAU) / DAFM / OPW	Members of the National Hydromorphology Expert Group	Complexities and the capacity within DHLGH and across relevant public bodies to progress

Assessing and advising on the legislative changes to the Arterial Drainage Act necessary to (1) support the national land use policy objectives arising out of the Land Use Review, and (2) ensure that future arterial drainage practices are sustainable and support the environmental objectives set out in the 2021 Climate Action Plan, the WFD River Basin Management Plan, the National Biodiversity Action Plan and the related Nature Restoration Law, as well as flood risk management objectives		TBC	DECC / DHLGH (Water Policy & WAU) / DAFM / OPW	Members of the National Hydromorphology Expert Group	Complexities and the capacity within DHLGH and across relevant public bodies to progress

Forestry

Forestry 1	**In support of the Catchment Management Work Plans, the Department of Agriculture, Food and the Marine will publish a Sectoral Action Work Plan. DAFM will update the 2018 document "Forests and Water: Achieving Objectives under Ireland's River Basin Management Plan 2018-2021" as the Forestry Sectoral Action Work Plan supporting the third RBMP.**				
Steps Necessary for Delivery	**Proposed Output**	**Timeline**	**Lead Org**	**Stakeholder Support**	**Resources/Risks/Dependencies**
Appropriate staff resources to allow for the drafting of revisions	New or updated standards, requirements, protocols and procedures.	Q3 2023	DAFM - Forestry Inspectorate	IFI / NPWS / LAWPRO / ASSAP / Local Authorities / Uisce Éireann / NFGWS / EPA / GSI	Availability of staffing resources
Training of relevant parties (DAFM Forestry Inspectors and Ecologists, Registered Foresters and private Ecologists) on new or updated standards, requirements, protocols and procedures	All relevant professionals working in the sector updated and upskilled	Q4 2023	DAFM - Forestry Inspectorate	IFI / NPWS / LAWPRO / ASSAP / Local Authorities / Uisce Éireann / NFGWS / EPA / GSI	Availability of staffing resources
Engagement with POMs WG	Agreement on the development of the template for sectoral action work plans and the CM Work Plans	Q2 2024	DAFM - Forestry Inspectorate	DHLGH / LAWPRO / EPA	Engagement by POMs WG members. Adequate resources available

Plan Development: Review of 2024 Forestry Sectors Work Plans including water body scale actions for the development of the Sectoral Action Work Plan template and for use in the pilot Catchment Management Work Plans	To inform the Sectoral Action Work Plan template and CM Work Plan template and data for input into the pilot CM Work Plan	Q2-Q3 2024	DAFM - Forestry Inspectorate	DHLGH / LAWPRO / EPA	Agreement on the relevant data to be collated. Full participation by different implementing bodies and projects in forestry sector. Data available in useable format. Data management system developed. Data sharing arrangements in place
Plan Development: Data collation of relevant work plan items and proposed measures on national basis including targets (annual or multi-annual data 2025-2027	Sectoral Action Work Plan and data for input into the CM Work Plan	Q1 2025	DAFM - Forestry Inspectorate	DHLGH / LAWPRO / EPA	Agreement on the relevant data to be collated. Full participation by different implementing bodies and projects in forestry sector. Data available in useable format. Data management system developed. Data sharing arrangements in place
Implementation Tracking: Annual reporting of implementation of measures per catchment	Catchment implementation recorded and accessible via data management system to the public	Q1-Q2 2026 (interim assessment)	DAFM - Forestry Inspectorate	DHLGH / LAWPRO / EPA	Implementation data available in a timely manner and at catchment scale. Data management system in place
Implementation Tracking: Annual reporting of implementation of measures per catchment	Catchment implementation recorded and accessible via data management system to the public	Q1-Q2 2027 (3rd Cycle outcomes)	DAFM - Forestry Inspectorate	DHLGH / LAWPRO / EPA	Implementation data available in a timely manner and at catchment scale. Data management system in place

Forestry 2	**DAFM recognises the key recommendation from the HYDROFOR Project (2016) to "cease afforestation on peat soils in acid-sensitive headwater catchments", and is applying various water and non-water related policies, procedures and protocols that combine to rule out afforestation on such sites, or to limit it to appropriate multi-benefit native woodland.**				
Steps Necessary for Delivery	Proposed Output	Timeline	Lead Org	Stakeholder Support	Resources/Risks/Dependencies
Application of various State Aid rules underpinning the Forestry Programme (e.g. new soil type and fertility requirements, the exclusion of afforestation from undesignated Annex 1 habitats, SPAs and wetland habitats) and existing procedures and protocols (e.g. appropriate assessment and the protocol for acid sensitive areas)	Sites on peat soils in acid sensitive headwater catchments not approved for afforestation. Where afforestation does occur, limited to native woodland establishment and aimed at delivering eco-system services, including the protection of water	Forestry Programme 2023-2027	DAFM - Forestry	Water agencies and eNGOs / forestry sector	Forestry sector; adequate number of suitably qualified and experienced staff working to appropriate SOPs
Forestry 3	**DAFM to increase the area of forests with appropriate water setbacks through the ongoing restructuring of existing forest stands at clearfell / reforestation stage.**				
Steps Necessary for Delivery	**Proposed Output**	**Timeline**	**Lead Org**	**Stakeholder Support**	**Resources/Risks/Dependencies**
Assessment of applications for tree felling licences for projects involving clearfelling and reforestation, including the constituent elements (such as referrals to other agencies, public consultation and Appropriate Assessment, and relevant protocols)	Applications complete the process and constituent elements within a reasonable timeframe, and a final robust decision is reached to license or not to license. If licensed, any conditions attached adhere to the criteria set out in DEHLG Development Management Guidelines 2007. Chapter 7, Section 7.3 (i.e. necessary; relevant to planning; relevant to the development to be permitted; enforceable; precise; and reasonable)	Forestry Programme 2023 - 2027	DAFM - (Forestry Inspectorate and Forestry Division)	NPWS / IFI / LAWPRO / Local Authorities / Uisce Éireann / other consultation bodies and the general public	Adequate number of suitably qualified and experienced staff working to appropriate SOPs

Continue to bring about the restructuring of forests and to undertake selected forest removal, where required, through the felling licence system and in accordance with the Felling and Reforestation Policy (and also through the availability of support for forest owners, under various support schemes under the current Forestry Programme, including the Continuous Cover Forestry Scheme and the Reforestation for Climate Resilience Scheme)	Continual engagement with relevant stakeholders (including forest owners and Registered Foresters), to underline the necessity for such restructuring in various subbasins, and to flag the availability of possible supports under the Forestry Programme, using relevant schemes	Forestry Programme 2023 - 2027	DAFM - Forestry	Forestry sector (private and public (Coillte)) / NPWS / IFI / LAWPRO / Local Authorities / Uisce Éireann / other consultation bodies / and the general public	Adequate number of suitably qualified and experienced staff working to appropriate SOPs
Continued engagement with stakeholders to ensure the most current and accurate data are used in the assessment process	Data incorporated into the information systems used by Registered Foresters (i.e. iNET) and Inspectorate staff (iFORIS, Ecology QGIS), as soon as possible after it is issued by the parent agency	Forestry Programme 2023 - 2027	DAFM - Forestry	Forestry sector (private and public (Coillte)) / NPWS / IFI / LAWPRO / Local Authorities / EPA / Uisce Éireann / GSI / OPW / NFGWS	Compatible datasets; ongoing maintenance and upgrading of the GIS based platforms IFORIS and Ecology QGIS (as used by the Forestry Inspectorate), and iNET (as used by Registered Foresters)
Number of field inspections	Field inspections undertaken by Forestry Inspectorate (including Forestry Inspectors and Ecologists); different types of inspections (pre-approval, operation, post-operation, ad hoc, incident-related)	Forestry Programme 2023 - 2027	DAFM - (Forestry Inspectorate and Forestry Division)	Forestry sector (private and public (Coillte)) / NPWS / IFI / LAWPRO / Local Authorities / EPA / Uisce Éireann / GSI / OPW / NFGWS	Adequate number of suitably qualified and experienced staff working to appropriate SOPs
Forestry 4	**DAFM to ensure the application of water setbacks and other water-based protection during the creation of new forests, principally realised with support under the 2023 – 2027 Afforestation Scheme.**				
Steps Necessary for Delivery	**Proposed Output**	**Timeline**	**Lead Org**	**Stakeholder Support**	**Resources/Risks/Dependencies**
Continued engagement with stakeholders to ensure the most current and accurate data are used in the assessment process	Data incorporated into the information systems used by Registered Foresters (i.e. iNET) and Inspectorate staff (i.e. iFORIS, Ecology QGIS), as soon as possible after it is issued by the parent agency	Forestry Programme 2023 - 2027	DAFM - Forestry	Forestry sector (private and public (Coillte)) / NPWS / IFI / LAWPRO / Local Authorities / EPA / Uisce Éireann / GSI / OPW / NFGWS	Compatible datasets; ongoing maintenance and upgrading of the GIS based platforms IFORIS and Ecology QGIS (as used by the Forestry Inspectorate), and iNET (as used by Registered Foresters)

Assessment of the application for afforestation (with or without grant aid), including the constituent elements (such as referrals to other agencies, public consultation, Appropriate Assessment and EIA procedures, and relevant protocols, such as that for acid sensitive areas)	Applications complete the assessment process and constituent elements within a reasonable timeframe, and a final robust decision is reached to license or not to license. If licensed, any conditions attached adhere to the criteria set out in DEHLG Development Management Guidelines 2007. Chapter 7, Section 7.3 (i.e. necessary; relevant to planning; relevant to the development to be permitted; enforceable; precise; and reasonable)	Forestry Programme 2023 - 2027	DAFM - (Forestry Inspectorate and Forestry Division)	Forestry sector (private and public (Coillte)) / NPWS / IFI / LAWPRO / Local Authorities / EPA / Uisce Éireann / GSI / OPW / NFGWS	Adequate number of suitably qualified and experienced staff working to appropriate SOPs
Forestry 5	**DAFM to manage the application of support measures that have a clear role in relation to the protection of water, including: the Continuous Cover Forestry Scheme; the various native woodland and agro-forestry options under the Afforestation Scheme, the Native Woodland Conservation Scheme, and the Reforestation for Climate Resilience Scheme.**				
Steps Necessary for Delivery	**Proposed Output**	**Timeline**	**Lead Org**	**Stakeholder Support**	**Resources/Risks/Dependencies**
New schemes with a particular relevance to the delivery of water-related ecosystem services to be introduced in the Forestry Programme 2023 - 2027	The roll-out and subsequent uptake of new schemes included in the Forestry Programme and relating to native woodland and agro-forestry establishment, continuous cover forestry, the restoration of existing native woodland, conversion of conifer stands to native woodland, the environmental enhancement of existing forests, and also, support measures such as temporary bridging programme	Forestry Programme 2023 - 2027	DAFM - Forestry	NPWS / EPA / IFI / Local Authorities / Woodlands of Ireland	Ongoing availability of funding through the period; availability of suitable planting material
Forestry 6	**DAFM to encourage the uptake of Forest Type 3 under the Afforestation Scheme, aimed at funding native woodland creation on public land, specifically to deliver woodland-based solutions for the protection of drinking water sources and water in general.**				
Steps Necessary for Delivery	**Proposed Output**	**Timeline**	**Lead Org**	**Stakeholder Support**	**Resources/Risks/Dependencies**
Direct engagement with public bodies eligible under FT3	Number of projects approved under FT3, and subsequently implemented	Forestry Programme 2023 -2027	DAFM - Forestry	Climate Action Regional Office (CARO) / Woodlands of Ireland / and all public bodies with land ownership	Adequate number of suitably qualified and experienced staff

Training for relevant parties in making applications under the scheme and assessing applications	Training targeted at Registered Foresters involved in developing applications under FT3, and at members of the Inspectorate involved in assessing applications under FT3	Forestry Programme 2023 - 2027	DAFM - Forestry	Climate Action Regional Office (CARO) / Woodlands of Ireland / and all public bodies with land ownership	Adequate number of suitably qualified and experienced staff; availability of stakeholders to co-develop and deliver training
Awareness-raising targeted at potential applicants and also at personnel of water-related stakeholders, who may direct potential applicants towards the scheme	Awareness-raising through normal promotional means and also via articles and presentations at various water-related forums and to specific water agencies	Forestry Programme 2023 - 2027	DAFM - Forestry	Climate Action Regional Office (CARO) / Woodlands of Ireland / all public bodies with land ownership / the forestry sector (private and public (Coillte)) / NPWS / IFI / LAWPRO / Local Authorities / EPA / Uisce Éireann / GSI / OPW / NFGWS / ENGOs	Adequate number of suitably qualified staff; availability of stakeholders to engage and promote the scheme
Monitor uptake of the scheme	Through in-house records, monitor the uptake of FT3 and the subsequent realisation of approved projects. Identify and address problems identified, exploit new opportunities as they arise	Forestry Programme 2023 - 2027	DAFM - Forestry	Climate Action Regional Office (CARO) / Woodlands of Ireland / all public bodies with land ownership / the forestry sector (private and public (Coillte)) / NPWS / IFI / LAWPRO / Local Authorities / EPA / Uisce Éireann / GSI / OPW / NFGWS / ENGOs	Ongoing maintenance and upgrading of the GIS based platforms IFORIS and Ecology QGIS (as used by the Forestry Inspectorate), and iNET (as used by Registered Foresters); availability of suitable planting material

Forestry 7	DAFM to launch the new Forests for Water option (Forest Type 2) under the Afforestation Scheme, which offers added incentives to farmers and other landowners to promote the creation of new native forests specifically to provide water services, including improvements to water quality, drinking water source protection, natural water retention, the improvement of aquatic and riparian habitats, and the expansion of alluvial woodland.				
Steps Necessary for Delivery	**Proposed Output**	**Timeline**	**Lead Org**	**Stakeholder Support**	**Resources/Risks/Dependencies**
Implementation of a new Forests for Water Scheme (represented by FT2 under the Afforestation Scheme)	Number of projects approved under FT2, and subsequently implemented	Forestry Programme 2023 - 2027	DAFM - Forestry	Woodlands of Ireland / IFI / NPWS / LAWPRO / ASSAP / Local Authorities / Uisce Éireann / NFGWS / EPA	Ongoing availability of funding through the period Availability of suitable planting material.
Training for relevant parties in making applications under the scheme and assessing applications	Training targeted at Registered Foresters involved in developing applications under FT3, and at members of the Inspectorate involved in assessing applications under FT3	Forestry Programme 2023 - 2027	DAFM - Forestry	Woodlands of Ireland / IFI / NPWS / LAWPRO / ASSAP / Local Authorities / Uisce Éireann / NFGWS / EPA	Adequate number of suitably qualified and experienced staff; availability of stakeholders to co-develop and deliver training
Awareness-raising targeted at potential applicants and also at personnel of water-related stakeholders, who may direct potential applicants towards the scheme	Awareness-raising through normal promotional means and also via articles and presentations at various water-related forums and to specific water agencies	Forestry Programme 2023 - 2027	DAFM - Forestry	Woodlands of Ireland / IFI / NPWS / LAWPRO / ASSAP / Local Authorities / Uisce Éireann / NFGWS / EPA	Adequate number of suitably qualified staff; availability of stakeholders to engage and promote the scheme
Monitor uptake of the scheme	Through in-house records, monitor the uptake of the scheme and the subsequent realisation of approved projects. Identify and address problems identified, exploit new opportunities as they arise	Forestry Programme 2023 - 2027	DAFM - Forestry	Woodlands of Ireland / IFI / NPWS / LAWPRO / ASSAP / Local Authorities / Uisce Éireann / NFGWS / EPA	Ongoing maintenance and upgrading of the GIS based platforms IFORIS and Ecology QGIS (as used by the Forestry Inspectorate), and iNET (as used by Registered Foresters); availability of suitable planting material

Forestry 8	**DAFM to continue to address all forestry-related water incidents, as identified by DAFM Inspectors and LAWPRO or reported to DAFM Forestry by foresters, water agencies, environmental NGOs and members of the public.**				
Steps Necessary for Delivery	**Proposed Output**	**Timeline**	**Lead Org**	**Stakeholder Support**	**Resources/Risks/Dependencies**
Effective Standard Operating Procedures for inspecting live sites	Kept up-to-date and available to Inspectorate staff	Forestry Programme 2023 - 2027	DAFM - Forestry Inspectorate	IFI / NPWS / LAWPRO / ASSAP / Local Authorities / Uisce Éireann / NFGWS / EPA	Adequate number of suitably qualified and experienced staff
Effective Standard Operating Procedures for responding to, assess and resolve incidents	SOP updated as new issues necessitate it; also, periodic review of SOP	Forestry Programme 2023 - 2027	DAFM - (Forestry Inspectorate and Forestry Division)	IFI / NPWS / LAWPRO / ASSAP / Local Authorities / Uisce Éireann / NFGWS / EPA	Adequate number of suitably qualified staff
Continued active engagement with relevant stakeholders	Effective resolution of forestry-related water incidents, following engagement with forest owner and his / her agents (incl. Registered Forester and Operator) and with relevant water-related stakeholders	Forestry Programme 2023 - 2027	DAFM - (Forestry Inspectorate and Forestry Division)	IFI / NPWS / LAWPRO / ASSAP / Local Authorities / Uisce Éireann / NFGWS / EPA	Adequate number of suitably qualified and experienced staff; availability of stakeholders to engage
Training provided to Registered Foresters and Contractors	Engagement through Circular(s) to the Trade with the forestry sector, information notes and direct engagement via training events	Forestry Programme 2023 - 2027	DAFM - (Forestry Inspectorate and Forestry Division)	IFI / NPWS / LAWPRO / ASSAP / Local Authorities / Uisce Éireann / NFGWS / EPA / forestry representative bodies	Adequate number of suitably qualified and experienced staff
Forestry 9	**DAFM to train Registered Foresters, Consultant Ecologists and machine operators, in relation to the design, and implementation of forestry projects, from the perspective of protecting and enhancing receiving waterways.**				
Steps Necessary for Delivery	**Proposed Output**	**Timeline**	**Lead Org**	**Stakeholder Support**	**Resources/Risks/Dependencies**
Training of forest owners	No. of owners trained	Forestry Programme 2023 - 2027	DAFM - Forestry	Forest owner representative bodies (e.g. ITGA, IFA) / Teagasc / EPA / IFI and other water agencies, to input into training content	Adequate number of suitably qualified and experienced staff; availability of stakeholders to engage; availability of water agencies to input

Training of Registered Foresters	No. of foresters trained	Forestry Programme 2023 - 2027	DAFM - Forestry	Registered Foresters / EPA / IFI and other water agencies, to input into training content	Adequate number of suitably qualified and experienced staff; availability of stakeholders to engage; availability of water agencies to input
Training of forestry contractors	No. of contractors trained	Forestry Programme 2023 - 2027	DAFM - Forestry	Forestry contractors / EPA / IFI and other water agencies, to input into training content	Adequate number of suitably qualified and experienced staff; availability of stakeholders to engage; availability of water agencies to input
Training of DAFM Forestry staff involved in licence assessments	Number of staff trained	Forestry Programme 2023 - 2027	DAFM - Forestry	DAFM Forestry staff / EPA / IFI and other water agencies, to input into training content, relevant agencies in the development of training materials	Adequate number of suitably qualified and experienced staff; availability of stakeholders to engage; availability of water agencies to input
Forestry 10	**Continue to seek improvements to the licence applications process for key forestry activities.**				
Steps Necessary for Delivery	**Proposed Output**	**Timeline**	**Lead Org**	**Stakeholder Support**	**Resources/Risks/Dependencies**
Appropriate numbers of suitably qualified staff to access applications for forestry licences (with or without grant approval)	Number of applications processes and final decisions issued	Forestry Programme 2023 - 2027	DAFM - (Forestry Inspectorate and Forestry Division)	Forestry sector (private and public (Coillte)) / NPWS / IFI / LAWPRO / Local Authorities / An Taisce / EPA and Uisce Éireann (via referral process and bilateral engagement); other 3rd parties and the public, through consultation processes	Approval and availability of funding for recruitment
Continued engagement with stakeholders	Number of bilateral meetings; development of bespoke solutions and protocols	3rd cycle River Basin Management Plan	DAFM - Forestry	Forestry sector (private and public (Coillte)) / NPWS / IFI / LAWPRO / Local Authorities / An Taisce / EPA / Uisce Éireann / GSI / OPW NFGWS / ENGOs	Availability and capacity of stakeholders

Continued engagement with stakeholders to ensure the most current and accurate data are used in the assessment process	Engagement at various WFD forums and also, bilaterals with specific bodies with data, including EPA, LAWPRO, IFI and NPWS	Forestry Programme 2023 - 2027	DAFM - Forestry	Forestry sector (private and public (Coillte)) / NPWS / IFI / LAWPRO / Local Authorities / An Taisce / EPA / Uisce Éireann / GSI / OPW / NFGWS / ENGOs	Compatible datasets; ongoing maintenance and upgrading of the GIS based platforms IFORIS and Ecology QGIS (as used by the Forestry Inspectorate), and iNET (as used by Registered Foresters)
Review and update policy and procedures in line with new legislation, judgements, research and policy decisions	Engagement at various WFD forums and with specific bodies directly involved, including research institutes, EPA, LAWPRO, IFI, NPWS, and DAFM Research Division	Forestry Programme 2023 - 2027	DAFM - Forestry	Forestry sector (private and public (Coillte)) / NPWS / IFI / LAWPRO / Local Authorities / An Taisce / EPA / Uisce Éireann / GSI / OPW / NFGWS / ENGOs	Adequate number of suitably qualified and experienced staff working to appropriate SOPs
Number of field inspections	Field inspections undertaken by Forestry Inspectorate (including Forestry Inspectors, Ecologists and Engineers); different types of inspections (pre-approval, operation, post-operation, ad hoc, incident-related)	Forestry Programme 2023 - 2027	DAFM - (Forestry Inspectorate and Forestry Division)	Forestry sector (private and public (Coillte)) / NPWS / IFI / LAWPRO / Local Authorities / EPA / Uisce Éireann / GSI / OPW / NFGWS	Adequate number of suitably qualified and experienced staff working to appropriate SOPs

Urban Wastewater

UWW 1	**Uisce Éireann will continue investment in wastewater infrastructure investing over €2.3bn over the period 2020 – 2024. This includes 108 wastewater treatment plants and 77 collection networks at an estimated cost of €1.542bn and 92 national programmes at an estimated cost of €780m.**				
Steps Necessary for Delivery	**Proposed Output**	**Timeline**	**Lead Org**	**Stakeholder Support**	**Resources/Risks/Dependencies**
Compile list of RC3 projects	List of projects that have been completed in RC3*	Q4 2024	Uisce Éireann	DHLGH / CRU	Capacity, funding, supply chain, statutory consent process

*See Appendix 9 for more information on RC3 Project List. This list includes projects that are complete and also some that are underway. Figures correct as of 19th March 2024.

UWW 2	Uisce Éireann will deliver infrastructure projects as set out in the Appendices for the next RBMP third-cycle (2022-2027).				
Steps Necessary for Delivery	**Proposed Output**	**Timeline**	**Lead Org**	**Stakeholder Support**	**Resources/Risks/Dependencies**
Compile list of proposed projects between 2022-2027	List of projects to be completed between 2022-2027 compiled*	Q4 2027	Uisce Éireann	DHLGH (WAU)	Capacity, funding, supply chain, statutory consent process

*See 'Appendix 6 – Urban Wastewater Project List – Uisce Éireann' for further information. Uisce Éireann have complied a list (Appendix 6 - List 1) of projects that will be completed within the 3rd cycle of the RBMP. Uisce Éireann have also compiled a list (Appendix 6 - List 2a) of projects which will have started and will be complete in the three years following the 3rd cycle of the RBMP. Figures correct as of 19th March 2024. Subject to approval of RC4 funding.

UWW 3	Uisce Éireann will assess urban wastewater requirements for the 197 Water Bodies where Urban Wastewater has been identified as a significant pressure by 2027, including any new significant pressure water bodies identified by LAWPRO.				
Steps Necessary for Delivery	**Proposed Output**	**Timeline**	**Lead Org**	**Stakeholder Support**	**Resources/Risks/Dependencies**
Assess the 197 Water Bodies where urban wastewater is identified as a significant pressure	List compiling the actions on all 197 WB where urban wastewater is identified as a significant pressure*	Q4 2022 and reviewed every 2 years	Uisce Éireann	EPA / DHLGH	Supply chain constraints, any further issues or constraints identified during the feasibility study process

*See Appendix 7 for further information. Uisce Éireann have complied a list which addresses the 197 water bodies where urban wastewater has been identified as a significant pressure. Figures correct as of 19th March 2024.

UWW 4	Uisce Éireann will apply for reviews of Wastewater Discharge Authorisations, where required. The applications shall be in a timeframe that is appropriate to the delivery programme and agreed with the EPA.				
Steps Necessary for Delivery	**Proposed Output**	**Timeline**	**Lead Org**	**Stakeholder Support**	**Resources/Risks/Dependencies**
Review of the licences initiated by the Agency Review licences where Uisce Éireann propose to increase wastewater capacity in support of social and economic growth	Licence applications prepared by Uisce Éireann	Ongoing	Uisce Éireann	EPA	Timeframes for submission of WWDA review applications, should have regard for: Lead time to collect, prepare the relevant environmental studies necessary to support review application e.g. EIAR, NIS, Marine Modelling Studies. Should be aligned to the timeframes set in UÉ Investment Plan/Revenue Cycle, where the proposal involves infrastructural development for which a grant of permission is required

UWW 5	**DHLGH will deliver a multi-annual investment programme to provide wastewater infrastructure for villages not served by public wastewater collection systems.**				
Steps Necessary for Delivery	**Proposed Output**	**Timeline**	**Lead Org**	**Stakeholder Support**	**Resources/Risks/Dependencies**
Prepare Framework document for new funding measure under the Multi-annual Rural Water Programme (MARWP)	Funding under MARWP	Q2 2022 (Framework completed)	DHLGH (Rural Water)	Local Authorities / Uisce Éireann / EPA / LAs / communities	
Launch funding measure under the MARWP	Demonstration projects in medium term (4-6 years)	Q2 2022 (Launch completed)	DHLGH (Rural Water)	Uisce Éireann / EPA / LAs / communities	Land acquisition, planning issues
UWW 6	**Uisce Éireann's River Basin Management Plan – Enhanced Ambition Programme will deliver at least 10 new wastewater treatment plant upgrades not funded under the current investment plan where discharges have been identified as being significant pressures on water bodies and impacting on WFD objectives.**				
Steps Necessary for Delivery	**Proposed Output**	**Timeline**	**Lead Org**	**Stakeholder Support**	**Resources/Risks/Dependencies**
Works identification	Works identified for inclusion on the programme	Q3 2022	Uisce Éireann	Project funded by the European Union under the National Recovery and Resilience Plan	Supply chain constraints. Any further issues or constraints identified during the feasibility study process
Works completion	Completion of the upgrades to the selected small waste water treatment plants	Q3 2025	Uisce Éireann	Project funded by the European Union under the National Recovery and Resilience Plan	Supply chain, planning and technical constraints, inflationary pressures. Successful navigation of the statutory processes
UWW 7	**Uisce Éireann will continue investment in storm water overflows with a minimum of 139 upgrades over the period 2022-2027.**				
Steps Necessary for Delivery	**Proposed Output**	**Timeline**	**Lead Org**	**Stakeholder Support**	**Resources/Risks/Dependencies**
Investment in 139 Storm Water Overflows	Upgrade work to 139 Storm Water Overflows*	2027	Uisce Éireann	DHLGH / CRU	Capacity, funding, supply chain, statutory consent process

*Subject to approval of RC4 funding

UWW 8	**Following the completion of negotiations, DHLGH will undertake transposition into Irish law of the recast Urban Wastewater Treatment Directive.**				
Steps Necessary for Delivery	**Proposed Output**	**Timeline**	**Lead Org**	**Stakeholder Support**	**Resources/Risks/Dependencies**
Engage with the EU Commission and Member States on the negotiation of a recast of the Directive	Recast Urban Wastewater Directive	Q3 2022 to Q2 2027 (estimated)	DHLGH (WAU)	EPA / Uisce Éireann / Other national experts as required	Resources will be drawn from the Stakeholders. Risks: - recast Directive sets undeliverable targets environmentally and / or financially - delays in the negotiation process
UWW 9	**Following the expected recast Urban Wastewater Treatment Directive the DHLGH will update the criteria for the performance of Combined Storm Water Overflows.**				
Steps Necessary for Delivery	**Proposed Output**	**Timeline**	**Lead Org**	**Stakeholder Support**	**Resources/Risks/Dependencies**
Convene stakeholder group to develop proposed new national policy	National Storm Water Overflow Policy to replace the Department of the Environment document: Procedures and Criteria in relation to Storm water Overflows	Q2 2028 depending on revision of UWWTD	DHLGH (WAU)	Uisce Éireann / EPA / CRU	Following the adoption of the revised UWWTD (estimated date Nov 2024), the Directive will then be transposed into National Law and following this transposition the Guidance on SWOs will be completed
UWW 10	**Uisce Éireann will put in place a Research and Innovation Programme on nature-based solutions for small wastewater treatment plants**				
Steps Necessary for Delivery	**Proposed Output**	**Timeline**	**Lead Org**	**Stakeholder Support**	**Resources/Risks/Dependencies**
Stage 1, Literature Review and Monitoring, including: Review international practice to identify appropriate NBS Enhanced monitoring and data collection at existing sites	Report on appropriate NBS including monitoring at selected sites. Data on process and ecosystem performance	Q3 2025	Uisce Éireann	EPA /CRU	Funding / Recruitment procurement

Stage 2, Ecosystems approach, including: Develop methodology for seasonal ELV approach to achieve environmental objectives using ecosystems design approach Design manual and updated NBS selection tool	Design approach that optimises NBS design having regard for ecosystems approach and seasonal/variable licensing. Design standards and process selection tool.	Q4 2027	Uisce Éireann	EPA / CRU	Funding / Recruitment procurement
UWW 11	**As part of the distance to target analysis process led by the EPA, the impact of Sectoral Action Work Plans, including that for urban wastewater discharges, will be assessed as part of the preparation of the 46 Catchment Management Work Plans. Uisce Éireann will publish a Sectoral Action Work Plan. The Sectoral Action Work Plan for urban wastewater discharges will include further detailed information on the targeting of measures to address the 197 water bodies at risk from urban wastewater discharges during the third-cycle.**				
Steps Necessary for Delivery	**Proposed Output**	**Timeline**	**Lead Org**	**Stakeholder Support**	**Resources/Risks/Dependencies**
Engagement with POMs WG	Agreement on the development of the template for Sectoral Action Work Plans and the CM Work Plans	Q2 2024	Uisce Éireann	LAWPRO / DHLGH / EPA	Engagement by POMs WG members. Adequate resources available
Plan Development: Review of 2024 Wastewater Sector Work Plans including water body scale actions for the development of the Sectoral Action Work Plan template and for use in the pilot Catchment Management Work Plans	To inform the Sectoral Action Work Plan template and CM Work Plan template and data for input into the pilot CM Work Plan	Q3 2024	Uisce Éireann	LAWPRO / DHLGH / EPA	Agreement on the relevant data to be collated. Full participation by different implementing bodies and projects in Urban Wastewater sector. Data available in useable format. Data management system scoped – system development initiated. Data sharing arrangements in place

Plan Development: Data collation of relevant work plan items and proposed measures on national basis including targets (annual or multi-annual data 2025-2027)	Sectoral Action Work Plan and data for input into the CM Work Plans	Q1 2025	Uisce Éireann	LAWPRO / DHLGH / EPA	Agreement on the relevant data to be collated. Full participation by different implementing bodies and projects in Urban Wastewater sector. Data available in useable format. Data management system at advanced development stage. Data sharing arrangements in place
Implementation Tracking: Annual reporting of implementation of measures per catchment	Catchment implementation recorded and accessible via data management system to the public	Q2 2026 (interim assessment)	Uisce Éireann	LAWPRO / DHLGH / EPA	Implementation data available in a timely manner and at catchment scale. Data management system in place
Implementation Tracking: Annual reporting of implementation of measures per catchment	Catchment implementation recorded and accessible via data management system to the public	Q2 2027 (3rd Cycle outcomes)	Uisce Éireann	LAWPRO / DHLGH / EPA	Implementation data available in a timely manner and at catchment scale. Data management system in place
UWW 12	**Uisce Éireann will engage with LAWPRO with the data required for their work in compiling the 46 catchment work plans and also trialling the Catchment Management Work Plans template in the 5 pilot catchments.**				
Steps Necessary for Delivery	**Proposed Output**	**Timeline**	**Lead Org**	**Stakeholder Support**	**Resources/Risks/Dependencies**
Engage with LAWPRO in the developement of 46 Catchment Work Plans also trialling the Catchment Management Work Plans template in the 5 pilot catchments	Provide information as required for catchment work plans and pilot catchment areas	2027	LAWPRO	UÉ	Resources capacity
UWW 13	**Continue to develop and update the distance to target/Gap Analysis as a tool to reflect Uisce Éireann's understanding of future needs, and consequent investment requirements.**				
Steps Necessary for Delivery	**Proposed Output**	**Timeline**	**Lead Org**	**Stakeholder Support**	**Resources/Risks/Dependencies**
Refresh of data and re-run of analysis	Updated UÉ gap analysis	Q4 2024 with regular subsequent updates, typically every 2 years	Uisce Éireann	DHLGH / EPA	

UWW 14	Update the Nutrient Sensitive Areas designations under the Urban Wastewater Treatment Directive.				
Steps Necessary for Delivery	**Proposed Output**	**Timeline**	**Lead Org**	**Stakeholder Support**	**Resources/Risks/Dependencies**
Review of Trophic Status	Technical Report	4 year cycle	DHLGH (WAU)	EPA	
For selected NSAs carry out review of impact of WWTPs on level of eutrophication to determine whether Article 5 Standards should apply	Technical Reports for each NSA including Source Apportionment Analyses and/or simple/complex modelling as required	1-2 years for simple analyses 3-4 years for complex cases	Uisce Éireann (as Sanitary Authority as per UWWTD)	DHLGH / EPA / UÉ	Risks: Requires resourcing/funding and continued buy-in from stakeholders for evidenced-based solutions.

Urban Runoff Pressures

Urban Runoff 1	LAWPRO in conjunction with DHLGH to develop recommendations for an implementation strategy for nature-based Sustainable Urban Drainage Systems on a national scale.				
Steps Necessary for Delivery	**Proposed Output**	**Timeline**	**Lead Org**	**Stakeholder Support**	**Resources/Risks/Dependencies**
Drafting of scoping document based on views of stakeholders obtained and detailed research	Draft scoping document submitted for approval	Q4 2021	DHLGH (WAU)	LAWPRO	
Publication of the scope for the delivery of a National Implementation Strategy through the River Basin Management Plan making process	Scoping document for the delivery of a National Implementation Strategy	Q4 2021	DHLGH (WAU)	LAWPRO	
Urban Runoff 2	**DHLGH to provide interim guidance documentation to the Local and Planning Authorities on measures to be implemented to support the delivery of a greater focus on nature-based solutions in advance of a national implementation strategy.**				
Steps Necessary for Delivery	**Proposed Output**	**Timeline**	**Lead Org**	**Stakeholder Support**	**Resources/Risks/Dependencies**
Drafting of interim guidance based on views of key stakeholders obtained and further research undertaken	Draft interim guidance document submitted for approval	Q4 2021	DHLGH (WAU)	LAWPRO	
Publication of interim guidance on best practice for Nature-based Solutions to the Management of Rainwater and Surface Water Runoff in Urban Areas	Interim guidance on the best practice for utilising Nature-Based Solutions	Q4 2021	DHLGH (WAU)	LAWPRO	

Urban Runoff 3	**Develop a National Implementation Strategy for Nature-based Sustainable Urban Drainage Systems on a national scale.**				
Steps Necessary for Delivery	**Proposed Output**	**Timeline**	**Lead Org**	**Stakeholder Support**	**Resources/Risks/Dependencies**
Draft a National Implementation Strategy based on views of key stakeholders	Draft National Implementation Strategy document submitted for approval	Q4 2025	DHLGH (WAU)	LAWPRO	
Roll out of implementation strategy	NBS Advice note for Design Manual for Urban Roads and Streets Rainwater Management Plan guidance Training across sectors and disciplines Integration into LA, national and local projects, planning and settlement plans Set up NBS inter agency visibility group to encourage NBS uptake across publicly funded projects Public engagement and participation in NBS	2027	DHLGH (WAU & Planning)	LAWPRO / DOT / TII / DRCD (funded projects) / DHLGH (funded projects) / NTA (funded projects)	
Urban Runoff 4	**DHLGH to establish a pilot project to investigate solutions to urban runoff using Nature-based Solutions.**				
Steps Necessary for Delivery	**Proposed Output**	**Timeline**	**Lead Org**	**Stakeholder Support**	**Resources/Risks/Dependencies**
1. Study impact of urban runoff on water quality over 2 years 2. Develop and construct a Nature-based solution to mitigate impacts of urban runoff on water quality 3. Monitor performance of Nature-based Solution for 2 years	Final report on performance of Nature-based Solution to mitigate urban runoff	5 years	Dublin City Council & Cork County Council	DHLGH (WAU)	Resource capacity, tight timeline of projects
Urban Runoff 5	**Additional resources will be provided to LAWPRO to provide specialist support to local authorities in adopting international best practice on nature-based surface water management within planning and infrastructure project delivery.**				
Steps Necessary for Delivery	**Proposed Output**	**Timeline**	**Lead Org**	**Stakeholder Support**	**Resources/Risks/Dependencies**
Complete review of Local Authority and agree resources required	Report to DHLGH	Q4 2023	CCMA	DHLGH / EPA / Local Authorities	Intermediate approval of Public Service Reform and Oversight Group required

Urban Runoff 6	**The DHLGH will work with NIEA to seek Peace Plus funding projects, which will trial Nature-based Solution measures and sustainable technologies.**				
Steps Necessary for Delivery	**Proposed Output**	**Timeline**	**Lead Org**	**Stakeholder Support**	**Resources/Risks/Dependencies**
DHLGH and NIEA, with the support of the EPA, to coordinate the technical aspects of a proposal for inclusion in the next call of Peace Plus	Proposal to trial Nature-based Solution measures and sustainable technologies under Peace Plus	Q3 2022	DHLGH and NIEA		
DHLGH to administer the funding arrangements should there be successful projects awarded	Catchment based project to trial nature-based solution and sustainable technology measures	2027	DHLGH		
Urban Runoff 7	**Review of outcomes of the Dublin Urban Rivers Life project.**				
Steps Necessary for Delivery	**Proposed Output**	**Timeline**	**Lead Org**	**Stakeholder Support**	**Resources/Risks/Dependencies**
Review Final Report in Dublin Urban Rivers Life Project (project end date Q2 2024)	Review of Life project outcomes	2026	DHLGH (WAU)	South Dublin County Council / Dun Laoghaire Rathdown County Council	Resource capacity, LIFE Project overrun
Urban Runoff 8	**Oversee the preparation of integrated urban drainage management plans.**				
Steps Necessary for Delivery	**Proposed Output**	**Timeline**	**Lead Org**	**Stakeholder Support**	**Resources/Risks/Dependencies**
Engagement between DHLGH, some LAs, Uisce Éireann and CRU to agree in principle a collaborative approach to development of integrated urban drainage management plans and thereafter develop a roadmap for same	Roadmap and guidance documents for integrated drainage planning based on undertaking integrated urban drainage management plans across six drainage sub-catchments: • 3 No. within the Dublin Region • 1 No. within the Eastern Region • 1 No. within the Midlands Region • 1 No. within the Southern Region	2027	Uisce Éireann	LA's / DHLGH (WAU) / CRU	Resource capacity for LA and Uisce Éireann. Note the revised UWWTD includes requirements for integrated drainage planning for larger agglomerations

Domestic Wastewater Discharges (Septic Tanks)

Domestic WW 1	**DHLGH will continue to promote and monitor the uptake of the new grant schemes to ensure adequate numbers of people are availing of this measure. A research project will be initiated under the ESRI Research Programme on behaviours and attitudes to assess the level of uptake, impediments to uptake and to make recommendations for improving uptake.**				
Steps Necessary for Delivery	**Proposed Output**	**Timeline**	**Lead Org**	**Stakeholder Support**	**Resources/Risks/Dependencies**
Monitor uptake of DWWTS grant schemes	Numbers of DWWTS grants claimed annually	Ongoing	DHLGH (Rural Water)	LAs	Sufficient availability of funding
ESRI to undertake research	Research paper outlining recommendations for improving the uptake in domestic wastewater treatment system upgrade grants	Q4 2023	DHLGH (WAU)		
Domestic WW 2	**A review of the National Inspection Plan (NIP) 2018-2021 was completed, with the outcome informing the next NIP for the period 2022-2027. An objective of these plans is to prioritise inspections to areas of greatest environmental and public health risk and secure upgrading works where required.**				
Steps Necessary for Delivery	**Proposed Output**	**Timeline**	**Lead Org**	**Stakeholder Support**	**Resources/Risks/Dependencies**
Review of National Inspection Plan (NIP) 2018-2021	Review of National Inspection Plan (NIP) 2018-2021	Q4 2021	EPA		
Domestic WW 3	**Local Authorities to engage with householders to improve general awareness of septic tank maintenance requirements, and to address any failing septic tanks.**				
Steps Necessary for Delivery	**Proposed Output**	**Timeline**	**Lead Org**	**Stakeholder Support**	**Resources/Risks/Dependencies**
Local Authorities shall establish a clearly ringfenced resource for this action	Assigned personnel and time		EPA and LA	DHLGH (WAU)	
Local Authorities shall put a written plan in place to complete the engagement activates as set out in the NIP	Engagement activities at level appropriate to the scale of reliance on DWWTS in the Local Authority functional area		EPA and LA	NIECE Septic Tank Inspectors Network / EPA	
Document and report activities	Annual report to DHLGH and EPA		LA	DHLGH / NIECE Septic Tank Inspectors Network / EPA	

Domestic WW 4	**Local Authorities to complete 5,800 inspections between 2022 and 2026 under the National Inspection Programme.**				
Steps Necessary for Delivery	**Proposed Output**	**Timeline**	**Lead Org**	**Stakeholder Support**	**Resources/Risks/Dependencies**
Local Authorities shall establish a clearly ringfenced resource for this action	Assigned personnel and time		EPA and LA	DHLGH (WAU)	
Inspections planned and completed each year as set out in the NIP	All inspections completed per the NIP		EPA and LA	NIECE Septic Tank Inspectors Network / EPA	
Domestic WW 5	**The Department of Housing, Local Government and Heritage to issue a policy direction to Local Authorities regarding Advisory Notices and Local Authorities to enforce advisory notices under the National Inspection Plan.**				
Steps Necessary for Delivery	**Proposed Output**	**Timeline**	**Lead Org**	**Stakeholder Support**	**Resources/Risks/Dependencies**
DHLGH to issue Advisory Notice to LAs	Advisory Notice issued		DHLGH (Rural Water)	Inspectors Network / EPA	
Local Authorities shall establish a clearly ringfenced resource for this action	Assigned personnel and time		EPA and LA	DHLGH (Rural Water)	
Enforcement progressed in line with the Water Services Act and NIP	All advisory notices followed through on in line with the Water Services Act and NIP		EPA and LA	DHLGH (Rural Water) / NIECE Septic Tank	
Document and report activities	Annual report to DHLGH and EPA		EPA and LA	DHLGH (Rural Water) / NIECE Septic Tank Inspectors Network, EPA	
Domestic WW 6	**DHLGH to consider the outcomes of the research project into the application of zero discharge nature-based solutions and their applicability or not within Ireland's climatic conditions.**				
Steps Necessary for Delivery	**Proposed Output**	**Timeline**	**Lead Org**	**Stakeholder Support**	**Resources/Risks/Dependencies**
Complete research project on: What are the feasible and sustainable nature-based options that can be developed further to achieve zero discharge and minimise the adverse impacts on water quality from domestic wastewater discharges	The research output aims to advance the management practices for domestic wastewater discharges in areas of low permeability soils where there are higher risks to groundwater and surface water quality	Q2 2025	TCD / Leitrim County Council	DHLGH (WAU)	This research project is ongoing and funded by the EPA. As with all research there is a possibility that the envisaged outcomes will not be attained. However robust research provides learning outcomes that will inform future practical applications and or further research

Domestic WW 7	Review the outcomes of the pilot projects under the first multi-annual Developer-Provided Water Services Infrastructure Resolution Programme to inform future policy considerations on resolving sub-standard developer provided infrastructure with sustainable solutions.				
Steps Necessary for Delivery	**Proposed Output**	**Timeline**	**Lead Org**	**Stakeholder Support**	**Resources/Risks/Dependencies**
Provide funding under the multi-annual DPI programme	Demonstration projects in medium term (2-4 years)	Q3 2022 (funding)	DHLGH (Rural Water)	LAs / Uisce Éireann / Local Authorities	Land acquisition, planning issues

Unknown Pressures

Unknown 1	The Local Authority Waters Programme (LAWPRO) will conduct assessments of water bodies in Priority Areas for Action where the pressures are unknown to identify the specific issues and actions that are required to protect or restore water quality as necessary.				
Steps Necessary for Delivery	**Proposed Output**	**Timeline**	**Lead Org**	**Stakeholder Support**	**Resources/Risks/Dependencies**
Assess unassigned WBs as part of PAA work and make referrals for implementation of measures	Identification of significant pressures. Implementation of measures	Q4 2027	LAWPRO	Regional Committees	Adequate resources in place for LAWPRO
Unknown 2	**Each local authority supported by LAWPRO will conduct assessments of other water bodies where the pressures are unknown (which are not within priority areas for action) to identify the specific issues and actions that are required to protect or restore water quality as necessary.**				
Steps Necessary for Delivery	**Proposed Output**	**Timeline**	**Lead Org**	**Stakeholder Support**	**Resources/Risks/Dependencies**
Assess unassigned WBs	Identification of significant pressures, where previously unknown	Q4 2027	Local Authorities	LAWPRO / Regional Committees	Adequate resources for local authorities
Unknown 3	**The Local Authority Services National Training Group (LASNTG) will provide appropriate training programmes including on Catchment assessment, Integrated Catchment Management, and farm inspections for the staff of local authorities and all implementing bodies.**				
Steps Necessary for Delivery	**Proposed Output**	**Timeline**	**Lead Org**	**Stakeholder Support**	**Resources/Risks/Dependencies**
Review training programme necessary for the LA natural water sector	Competency framework of training courses for LA environment section staff	Q1 2024	LAWPRO	LASNTG	Adequate resources for LAWPRO. CCMA Business case review report
Coordination of development of training materials	Training materials. Update of the Agricultural Pollution Inspection Programme to be prioritised for training development	Ongoing	LAWPRO	LASNTG / NIECE WG	Adequate resources for LAWPRO and LASNTG. NIECE WG on Agriculture Inspections recommendations on training. Sustainable funding available for training programmes

Roll out of training programme	Delivery of training to all implementing body staff. The Catchment Science course will now also be made available to members of the ACRES Cooperation Project Teams, which are responsible for delivering the ACRES CP under the CAP Strategic Plan	Ongoing	LASNTG	LAWPRO / NIECE WG / Implementing Bodies	Adequate resources for LAWPRO and LASNTG. Sustainable funding available for training programmes

Other Pressures

Other 1	**DHLGH will prepare a proposal for enacting abstraction regulations.**				
Steps Necessary for Delivery	**Proposed Output**	**Timeline**	**Lead Org**	**Stakeholder Support**	**Resources/Risks/Dependencies**
Draft legislation to be settled	Regulations published	Q2 2024	DHLGH		Drafter availability/approval granted/timetabling issues
Licensing fees regulations to be settled	Regulations published	02 2024	DHLGH		Drafter availability/approval granted/timetabling issues
Other 2	**The EPA, as competent authority will work with stakeholders to identify mitigation measures for abstractions determined to be significant pressures, and through the abstraction licensing process, require the implementation of relevant mitigation measures.**				
Steps Necessary for Delivery	**Proposed Output**	**Timeline**	**Lead Org**	**Stakeholder Support**	**Resources/Risks/Dependencies**
Site based monitoring to determine what migitation measures are required	Monitoring results	Ongoing	Uisce Éireann and/or Asset Owner where appropriate e.g. ESB for abstractions from ESB dams	Stakeholders include but are not limited to EPA/WI/ESB/OPW/ IFI/ Riparian Owners and impacted members of the public where appropriate	Resources will be required across multiple agencies for large scale monitoring, data collection, implementation of mitigation measures, applications for and processing of consents, etc. Stakeholder engagement is likely to be a key factor in the agreement and implementation of mitigation measures

Agreement of mitigation measures in consultation with the EPA	Mitigation measures		EPA (Regulator) and Uisce Éireann and/or Asset Owner where appropriate		Resources will be required across multiple agencies for large scale monitoring, data collection, implementation of mitigation measures, applications for and processing of consents, etc. Stakeholder engagement is likely to be a key factor in the agreement and implementation of mitigation measures
Implementation of mitigation measures and provision of site-based monitoring			Uisce Éireann and/or Asset Owner where appropriate		Resources will be required across multiple agencies for large scale monitoring, data collection, implementation of mitigation measures, applications for and processing of consents, etc. Stakeholder engagement is likely to be a key factor in the agreement and implementation of mitigation measures
Determination of effectiveness of measures based on ongoing monitoring			EPA (Regulator) and Uisce Éireann and/or Asset Owner where appropriate		Resources will be required across multiple agencies for large scale monitoring, data collection, implementation of mitigation measures, applications for and processing of consents, etc. Stakeholder engagement is likely to be a key factor in the agreement and implementation of mitigation measures
Other 3	**The need for exemptions will be reviewed as the abstraction licensing process is rolled out.**				
Steps Necessary for Delivery	**Proposed Output**	**Timeline**	**Lead Org**	**Stakeholder Support**	**Resources/Risks/Dependencies**
Ongoing monitoring of implementation of the abstraction licensing process	Identification of exemptions which may be required for specific abstractions	Ongoing	DHLGH (WAU)	Uisce Éireann / EPA	

Peatlands

Peat 1	**Measures set out in the National Peatlands Strategy to be updated into a new Implementation Plan by NPWS.**				
Steps Necessary for Delivery	**Proposed Output**	**Timeline**	**Lead Org**	**Stakeholder Support**	**Resources/Risks/Dependencies**
The Peatlands Strategy Implementation Group will report on progress in the implementation of actions regarding peatlands additional to those set out in the National Peatlands Strategy 2015	Progress reports on the implementation of the National Peatlands Strategy	Annually	NPWS	Peatlands Strategy Implementation Group	Reliant on the involvement of key stakeholders to the Strategy
Updating of measures in the National Peatlands Strategy	Publication of new Implementation plan for the National Peatlands Strategy	Q1 2023	NPWS	Peatlands Strategy Implementation Group	Reliant on the involvement of key stakeholders to the Strategy
Peat 2	**In support of the Catchment Management Work Plans, the NPWS will publish a Sectoral Action Work Plan. Measures set out in the National Peatlands Strategy to be updated into the Sectoral Action Work Plan by NPWS.**				
Steps Necessary for Delivery	**Proposed Output**	**Timeline**	**Lead Org**	**Stakeholder Support**	**Resources/Risks/Dependencies**
Engagement with POMs WG	Agreement on the development of the template for Sectoral Action Work Plans and the CM Work Plans	Q2 2024	NPWS	LAWPRO / DHLGH / EPA	Engagement by POMs WG members. Adequate resources available
Plan Development: Review of 2024 Peatlands Sector Work Plans including water body scale actions for the development of the Sectoral Action Work Plan template and for use in the pilot Catchment Management Work Plans	To inform the Sectoral Action Work Plan template and CM Work Plan template and data for input into the pilot CM Work plan	Q3 2024	NPWS	BnM / LAWPRO / DHLGH / EPA	Agreement on the relevant data to be collated. Full participation by different implementing bodies and projects in Peatlands sector. Data available in useable format. Data management system developed. Data sharing arrangements in place

Plan Development: Data collation of relevant work plan items and proposed measures on national basis including targets (annual or multi-annual data 2025-2027)	Sectoral Action Work Plan and data for input into the CM Work Plans	Q1 2025	NPWS	BnM / LAWPRO / DHLGH / EPA	Agreement on the relevant data to be collated. Full participation by different implementing bodies and projects in Peatlands sector. Data available in useable format. Data management system developed. Data sharing arrangements in place
Implementation Tracking: Annual reporting of implementation of measures per catchment	Catchment implementation recorded and accessible via data management system to the public	Q2 2026 (interim assessment)	NPWS	BnM / LAWPRO / DHLGH / EPA	Implementation data available in a timely manner and at catchment scale. Data management system in place
Implementation Tracking: Annual reporting of implementation of measures per catchment	Catchment implementation recorded and accessible via data management system to the public	Q2 2027 (3rd Cycle outcomes)	NPWS	BnM / LAWPRO / DHLGH / EPA	Implementation data available in a timely manner and at catchment scale. Data management system in place
Peat 3	**Continuation and expansion of NPWS national programme of peatland restoration on SAC and NHA raised bogs, blanket bogs and fens.**				
Steps Necessary for Delivery	**Proposed Output**	**Timeline**	**Lead Org**	**Stakeholder Support**	**Resources/Risks/Dependencies**
Continue implementation of the various programmes to restore the raised bog Special Area of Conservation and Natural Heritage Area network	Restoration measures commenced/ undertake on protected raised bogs	On-going during lifetime of plan	NPWS	External contractors and service providers/ Landowners / local communities & other stakeholders	Non-agreement by landowners. Ground conditions. Reliant on adequate resources and market availability of external providers. Necessary funding available

Peat 4	**Bord na Móna to oversee the EU LIFE Integrated Project "Peatlands and People".**				
Steps Necessary for Delivery	Proposed Output	Timeline	Lead Org	Stakeholder Support	Resources/Risks/Dependencies
Implementation of actions under the three pillars of the project	Restoration and rehabilitation of areas of peatlands in the midlands region. Implementation of actions under Climate Action Plan	2021-2028	Bord na Móna	Project partners (NPWS , EPA, NUIG, Erinn Innovation, DAFM (co-financer) / landowners / local communities & other stakeholders	Non-agreement by landowners. Ground conditions. Reliant on adequate resources. Necessary funding available
Delivery of Pillar 1, the Peatlands catalyst, to support climate action and carbon benefits	Rehabilitation across 7000 ha of BnM cutaway bog. Restoration of raised bog habitats across 15 SAC, NHA and other sites (2900 ha). Develop best practise and enhanced measures in peatlands restoration. Monitor climate action benefits. Rehabilitation and restoration of 9900 ha pf peatlands is expected to support improving water quality in the receiving catchments	2021-2028	Bord na Móna / NPWS	EPA / Local communities	
Delivery of Pillar 2, the economic catalyst, a Just Transition accelerator programme to support climate action and carbon benefits	Develop an Accelerator Hub for systemic innovation and incubator for low-carbon and circular economies. Adaptation technologies will be provided with incubator infrastructures to allow businesses to test and adopt ideas and technologies for a Just Transition, and for new SMEs to incubate ideas (and investment and funding opportunities) for application by businesses and local Councils. In addition, these will lead to job creation in a 'carbon region of transition'	2021-2028	Bord na Móna NUIG Erinn Innovation	Local authorities / Local enterprise boards / SMEs Local communities	

Delivery of Pillar 3, "the People's Attraction" the social and cultural catalyst, to support climate action and carbon benefits	Delivery of programme of actions. Develop an immersive, inspiring and magical attraction introducing visitors to the importance of climate action, peatlands, carbon, biodiversity and behaviour change. Screen potential sites, select a site and achieve planning permission for the development. Co-create behaviour and social change with communities and stakeholders through a financially sustainable, highly immersive and accessible tourist attraction of importance to climate action, peatlands, carbon and biodiversity (IP)	2021-2028	Bord na Móna NUIG Erinn Innovation	Eden International / Local authorities / Local communities	
Peat 5	**NPWS and Geological Survey Ireland to fund an investigation into the causes of blanket bog landslides that occurred across Ireland in 2020, and the vulnerability of other at-risk areas to future failures.**				
Steps Necessary for Delivery	**Proposed Output**	**Timeline**	**Lead Org**	**Stakeholder Support**	**Resources/Risks/Dependencies**
Investigate environmental factors of peatland failure; investigate potential to update National Landslide Susceptibility Map; prepare technical advisory note	Reports on main environmental factors that contributed to 3 major 2020 peatland failures in Ireland; potential to update National Landslide Susceptibility Map; technical advisory note to assist LAs in appraisal of failure susceptibility of developments proposed in peatlands	By Q3 2022	NPWS & GSI		Landowner co-operation for site access; quality of contractor outputs

Peat 6	DAFM to oversee the implementation of sustainable management practices developed through the Blackstairs Mountains and Wicklow Mountains EIP projects within the ACRES East/South East Cooperation Project zone.				
Steps Necessary for Delivery	**Proposed Output**	**Timeline**	**Lead Org**	**Stakeholder Support**	**Resources/Risks/Dependencies**
For Blackstairs EIP agreement of shareholders to burning moratorium and establishing firewatch programmes	Reduction of wildfires/peat erosion will reduce sediment load entering watercourses	2018 - 2023	DAFM	Yes – established project at start and developed and organised by individual commonage community groups	Communication upkeep with wider community and non-project commonages not covered. Heavy time investment for landowners and unlikely to continue past project end. Located partially within ACRES Cooperation Project Area, which will continue actions when EIP is finished
For Wicklow Mountains EIP there are a number of steps including implementation of measures such as fencing off areas, establishing vegetation on bare or eroding peat, tree planting, peatland rewetting, development of sustainable grazing plans, establishment of buffer zones	Implementation of these measures will help to stabilise stream banks and prevent erosion and prevent peat/ silt entering streams, provide filtering water flow, provide shading for water, improving biodiversity, raising water table to restore peatland, addressing overgrazing issues and ensuring good quality habitats to deliver for good quality water into the future	Benefits from implementation of measures will take effect immediately such as buffer zones preventing losses and some can take years – recovery of peatland could take 5 to 10 years	DAFM	Yes including NPWS, LAWPRO, farmers	Sourcing native trees and this may need a lead time to ensure sufficient stocks, peat measures can be very labour intensive if areas are hard to access and lack of machinery can be an issue, grazing management can be slow to change. Located partially within ACRES Cooperation Project Area, which will continue actions when EIP is finished
Peat 7	**Continuation of the Bord na Móna operated Enhanced Decommissioning, Rehabilitation and Restoration Scheme (EDRRS) to H2 2026.**				
Steps Necessary for Delivery	**Proposed Output**	**Timeline**	**Lead Org**	**Stakeholder Support**	**Resources/Risks/Dependencies**
Implementation of EDRRS on 33,000ha of peatlands where turf harvesting has ceased	Rehabilitation of 33,000ha of peatlands	By end of Q4 2026	DECC / Bord na Móna	NPWS (sponsor of EDRRS) / Bord na Móna (operator of EDRRS)	Necessary funds continue to be available from NRRF

Peat 8	Continuation of NPWS-led EU LIFE IP Wild Atlantic Nature programme, including the development of complementary projects such as enhancing restoration capacity through building projects such as Natura Communities, retrofitting programmes to reduce turf cutting in the Natura 2000 network of sites and development of a nature restoration programme compatible with Ireland's CAP Strategic Plan.				
Steps Necessary for Delivery	**Proposed Output**	**Timeline**	**Lead Org**	**Stakeholder Support**	**Resources/Risks/Dependencies**
DHLGH to oversee the coordination of the Wild Atlantic Nature LIFE Integrated Project (IP), bringing together the experience and knowledge of the associated partners, including implementation of preparatory and concrete actions	Actions implemented. Updates provided to PSG and LIFE monitors on progress of project actions	2021-2029	NPWS	Associated Beneficiaries – DAFM / Teagasc / Fáilte Ireland / Coillte / RTÉ / NWRA / The Heritage Council / Bord na Móna / USC	Resources for implementation

Industry, Mines & Quarries

IMQ 1	DHLGH will examine opportunities to further support businesses in taking on a water stewardship approach in their operations.				
Steps Necessary for Delivery	**Proposed Output**	**Timeline**	**Lead Org**	**Stakeholder Support**	**Resources/Risks/Dependencies**
Draft a National Water Stewardship policy	National Water Stewardship policy document drafted	Q4 2023	DHLGH (WAU)	DAFM / DETE / EPA / Uisce Éireann / CRU / Enterprise Ireland / IDA / Teagasc / Bord Bia / Bord Iascaigh Mhara	
Develop water stewardship standards	Delivery of water stewardship standards	Q1 2024	DHLGH (WAU)	National Standards Authority of Ireland (NSAI) / EPA / Enterprise Ireland / SEAI / Uisce Éireann	
Develop industry support structures and systems	Development of programmes and supports for water stewardship	Ongoing	DHLGH (WAU)	EPA	
Develop water stewardship standards for agriculture	Development of water stewardship standards for agriculture	Ongoing	DHLGH (WAU)	EPA / DAFM / Bord Bia	

Action 5.2 repeat (as above)	The National Technical Implementation Group will identify the issues preventing water quality objectives from being achieved and will identify any further evidence, legislative, policy or implementation gaps that need to be addressed.				
Steps Necessary for Delivery	**Proposed Output**	**Timeline**	**Lead Org**	**Stakeholder Support**	**Resources/Risks/Dependencies**
Establishment of topic based working groups as necessary	Identification of any evidence, legislative, policy or implementation gaps which need to be addressed with the aim of enhancing the protection of water quality and preventing declines	Ongoing	EPA	NTIG members	

Drinking Water Source Protection

Drinking Water 1	Development of Drinking Water Source Protection Framework and Guidelines to meet the requirements of the recast Drinking Water Directive, and incorporating the application of abstraction controls under the implementing regulations for the Water Environment (Abstractions and Associated Impoundments) Act 2022.				
Steps Necessary for Delivery	**Proposed Output**	**Timeline**	**Lead Org**	**Stakeholder Support**	**Resources/Risks/Dependencies**
Engagement with stakeholders (underway at present) Publish Guidance Review of National Framework and Guidance	Drinking Water Source Protection National Framework and Guidance Drinking Water Source Protection Guidance Review of implementation of Framework and Guidance	Q2 2023 Q2 2024 Q2 2026 (commence review)	DHLGH (WAU)	EPA / GSI / Uisce Éireann / LAWPRO / NFGWS	This output will be based on the recommendation from the Drinking Water Expert Group. Effective Drinking Water Source Protection requires: - Allocation of responsibilities in the Drinking Water Regulations 2023. - Provision of resources and funding for implementation of Drinking Water Source Protection
Regulations for the implementation of Water Environment (Abstractions and Associated Impoundments) Act 2022	Framework for the implementation of abstraction controls on large and environmentally significant abstractions	2024	DHLGH (Water Policy)	EPA / GSI / Uisce Éireann / LAWPRO / NFGWS	Effective abstraction control may impact of volumes of water currently being abstracted for Drinking Water supply. Alternative sources and more efficient resource management including leakage reductions will be needed

Drinking Water 2	A Sectoral Action Work Plan for Drinking Water will include measures and plans to address the source protection actions proposed under the Drinking Water Regulations. It will be coordinated by the DW Expert Group with support from Uisce Éireann, NFGWS and LAs.				
Steps Necessary for Delivery	**Proposed Output**	**Timeline**	**Lead Org**	**Stakeholder Support**	**Resources/Risks/Dependencies**
Engagement with POMs WG	Agreement on the development of the template for Sectoral Action Work Plans and the CM Work Plans	Q2 2024	DW Expert Group (DHLGH)	Uisce Éireann / NFGWS / LA / LAWPRO / GSI / HSE / EPA	Engagement by POMs WG members. Adequate resources available
Plan Development: Review of 2024 Drinking Water Work Plans including water body scale actions for the development of the Sectoral Action Work Plan template and for use in the pilot Catchment Management Work Plans	To inform the Sectoral Action Work Plan template and CM Work Plan template and data for input into the pilot CM Work Plan	Q3 2024	DW Expert Group (DHLGH)	Uisce Éireann / NFGWS / LA / LAWPRO / GSI / HSE / EPA	Agreement on the relevant data to be collated. Full participation by different implementing bodies and projects in Drinking Water sector. Data available in useable format. Data management system developed. Data sharing arrangements in place
Implementation Tracking: Data collation of relevant work plan items and proposed measures on national basis including targets (annual or multi-annual data 2025-2027)	Sectoral Action Work Plan and data for input into the CM Work Plans	Q1 2025	DW Expert Group (DHLGH)	Uisce Éireann / NFGWS / LA / LAWPRO / GSI / HSE / EPA	Agreement on the relevant data to be collated. Full participation by different implementing bodies and projects in Drinking water sector. Data available in useable format. Data management system developed. Data sharing arrangements in place
Implementation Tracking: Annual reporting of implementation of measures per catchment	Catchment implementation recorded and accessible via data management system to the public	Q2 2026 (interim assessment)	DW Expert Group (DHLGH)	Uisce Éireann / NFGWS / LA / LAWPRO / GSI / HSE / EPA	Implementation data available in a timely manner and at catchment scale. Data management system in place

Implementation Tracking: Annual reporting of implementation of measures per catchment	Catchment implementation recorded and accessible via data management system to the public	Q2 2027 (3rd Cycle outcomes)	DW Expert Group (DHLGH)	Uisce Éireann / NFGWS / LA / LAWPRO / GSI / HSE / EPA	Implementation data available in a timely manner and at catchment scale. Data management system in place

Invasive Alien Species

Invasive 1	**Finalise legislation for the implementation of the EU Invasive Alien Species (IAS) Regulation.**				
Steps Necessary for Delivery	**Proposed Output**	**Timeline**	**Lead Org**	**Stakeholder Support**	**Resources/Risks/Dependencies**
Resolve outstanding drafting issues	Draft legislation finalised	Q4 2024	NPWS	DHLGH	Allocation of resources
Bring new Statutory Instrument to Government	Memo for Government	Q4 2024	NPWS	IFI	Allocation of resources/funding
Invasive 2	**Implementation of existing management plans and Priority Pathway Action Plans (PPAP) for priority invasive species, and drafting of a new PPAP for Soils and Spoil.**				
Steps Necessary for Delivery	**Proposed Output**	**Timeline**	**Lead Org**	**Stakeholder Support**	**Resources/Risks/Dependencies**
Implement PPAP for water and boat users	PPAP for water and boat users to be published and implemented	Q4 2022	NPWS	NBDC / representative groups	Allocation of resources/funding
Implement PPAP for angling	PPAP for angling to be published and implemented	Q4 2022	NPWS	NBDC / representative groups	Allocation of resources/funding
Draft PPAP for Soils and Spoil	PPAP for Soils and Spoil	Q2 2023	NPWS	NBDC / representative groups	Allocation of resources/funding
Implement PPAP for Soils and Spoil	PPAP for Soils and Spoil to be implemented	Q2 2023	NPWS	NBDC / representative groups	Allocation of resources/funding
Invasive 3	**In support of the Catchment Management Work Plans, the NPWS will publish a Sectoral Action Work Plan, which will include for the implementation of existing management plans and Priority Pathway Action Plans (PPAP) for priority invasive species, and drafting of a new PPAP for Soils and Spoil.**				
Steps Necessary for Delivery	**Proposed Output**	**Timeline**	**Lead Org**	**Stakeholder Support**	**Resources/Risks/Dependencies**
Engagement with POMs WG	Agreement on the development of the template for Sectoral Action Work Plans and the CM Work Plans	Q2 2024	NPWS	LAWPRO / DHLGH / LA / EPA	Engagement by POMs WG members. Adequate resources available

Plan Development: Review of Invasive Species Work Plans including water body scale actions for the development of the Sectoral Action Work Plan template and for use in the pilot Catchment Management Work Plans	To inform the Sectoral Action Work Plan template and CM Work Plan template and data for input into the pilot CM Work Plan	Q3 2024	NPWS	LAWPRO / DHLGH / LA / NBDC / EPA	Agreement on the relevant data to be collated. Full participation by different implementing bodies and projects in Invasive Species sector. Data available in useable format. Data management system developed. Data sharing arrangements in place
Plan Development: Data collation of relevant work plan items and proposed measures on national basis including targets (annual or multi-annual data 2025-2027	Sectoral Action Work Plan and data for input into the CM Work Plans	Q1 2025	NPWS	LAWPRO / DHLGH / LA / NBDC / EPA	Agreement on the relevant data to be collated. Full participation by different implementing bodies and projects in Invasive Species sector. Data available in useable format. Data management system developed. Data sharing arrangements in place
Implementation Tracking: Annual reporting of implementation of measures per catchment	Catchment implementation recorded and accessible via data management system to the public	Q2 2026 (interim assessment)	NPWS	LAWPRO / DHLGH / LA / NBDC / EPA	Implementation data available in a timely manner and at catchment scale. Data management system in place
Implementation Tracking: Annual reporting of implementation of measures per catchment	Catchment implementation recorded and accessible via data management system to the public	Q2 2027 (3rd Cycle outcomes)	NPWS	LAWPRO / DHLGH / LA / NBDC / EPA	Implementation data available in a timely manner and at catchment scale. Data management system in place

Invasive 4	**Complete negotiations on the recruitment of additional Biodiversity Officers.**				
Steps Necessary for Delivery	**Proposed Output**	**Timeline**	**Lead Org**	**Stakeholder Support**	**Resources/Risks/Dependencies**
Conclude negotiations on the recruitment of additional Biodiversity Officers (10 new positions)	Agreement to roll out of a Biodiversity Officer Programme in local authorities	Q2 2022	The Heritage Council	NPWS / CCMA / LGMA / DHLGH	Availability of qualified personnel / budgetary provisions
Recruitment of additional Biodiversity Officers (11 new positions, approved February 2023)	Bring national total of Biodiversity Officers to 25 no.	Q3 2023	The Heritage Council	NPWS / CCMA / LGMA / DHLGH	Availability of qualified personnel / budgetary provisions
Invasive 5	**Include action on Invasive Alien Species (IAS) as a priority under Local Authority Biodiversity Grant Scheme. The Local Biodiversity Action Fund provides Local Authorities with funding to target actions in the National Biodiversity Action Plan. Projects that include the mapping and appropriate treatment of IAS are listed as priorities within this funding stream.**				
Steps Necessary for Delivery	**Proposed Output**	**Timeline**	**Lead Org**	**Stakeholder Support**	**Resources/Risks/Dependencies**
Call for proposals announced to Local Authorities to include IAS projects	Inclusion of IAS actions in funding proposals	Annually	NPWS	Local Authorities	Allocation of resources / funding
Invasive 6	**Develop a National Management Plan for Invasive Species, and bring to public consultation in early 2024.**				
Steps Necessary for Delivery	**Proposed Output**	**Timeline**	**Lead Org**	**Stakeholder Support**	**Resources/Risks/Dependencies**
Convene Steering Group to finalise the draft Plan	Advanced draft of Plan	Q2 2023	NPWS	NBDC / IFI / DHLGH / LAWPRO / Marine Institute / BIM / OPW	Allocation of resources
Public consultation and stakeholder engagement	Ensure wide engagement and important input from relevant stakeholders	Q2 2024	NPWS	NBDC / IFI / DHLGH / LAWPRO / Marine Institute / BIM / OPW / NIEA	Allocation of resources / funding
Progress to publication of the National Management Plan for Invasive Species	Agreed plan to be launched	Q4 2024	NPWS	NBDC / IFI / DHLGH / LAWPRO / Marine Institute / BIM / OPW	Allocation of resources / funding

Hazardous Chemicals in the Aquatic Environment

HazChem 1	DHLGH will amend the EQS Regulations to take account of the assessment of River Basin Specific Pollutants (RBSPs) by the National Aquatic Environmental Chemistry Group (NAECG).				
Steps Necessary for Delivery	**Proposed Output**	**Timeline**	**Lead Org**	**Stakeholder Support**	**Resources/Risks/Dependencies**
The NAECG is co-ordinated a review of the River Basin Specific Pollutants (RBSPs), which involves: Review of the current RBSP list. • Indentification of potential substances of concern for Ireland. • Determine the presence or otherwise of potential substances of concern in Irish surface waters. • Set EQSs for new specific pollutants (and review existing if required)	Report of monitoring results from the 24 no. sites monitored to determine the presence or otherwise of potential substances of concern in Irish surface waters. Revised Surface Water Regulations to take account of any new RBSP, deselection of existing SPs, and the revision of existing EQSs, if required	Q4 2024 for removal/addition of SPs. Following this, selection of suitable EQSs and review of existing EQSs will be completed	DHLGH (WAU) & EPA	Marine Institute / Uisce Éireann / GSI / DAFM / Waterways Ireland	The review of existing EQSs and selection of suitable EQSs may require contractor support, resulting in timeline of Q4 2023
HazChem 2	**DHLGH and EPA will input into the recently commenced EU work to revise the list of Priority Substances and Priority Hazardous Substances. This will include liaison with the EU Commission in relation to the proposed amendments to the EQS Directive.**				
Steps Necessary for Delivery	**Proposed Output**	**Timeline**	**Lead Org**	**Stakeholder Support**	**Resources/Risks/Dependencies**
DHLGH and EPA attend meetings of WFD Common Implementation Strategy Working Group Chemicals, and participate in discussions on changes to the priority substances list, and participation in the sub-group on revision of the priority substances list Adoption of the revised list, and transposition into Irish legislation	Production of draft substance dossiers and subsequent legislative proposals for update of the surface water priority substance list by the European Commission	Legislative proposals for the revised list to be put forward on 26/10/2022	DHLGH & EPA	Marine Institute	
	Adoption and transposition periods will follow legislative proposal	DHLGH & EPA	Marine Institute		

Liaise with the European Commission in relation to the proposed amendments to the EQS Directive, to include amendments to the list of priority substances	Changed list of priority substances (monitor for possible inclusion of antimicrobial resistance and microplastics)	Draft proposal received Q4 2022, negotiations to continue in 2023 & 2024	DHLGH	EPA / NAECG / Marine Institute	Currently a draft proposal with ongoing negotiations occurring at EU level. Outcome unknown
HazChem 3	**Teagasc, ASSAP and DAFM, with support from LAWPRO, will implement specific actions in high risk catchments to protect water quality from toxic impacts arising from the handling, use and disposal of sheep dip.**				
Steps Necessary for Delivery	**Proposed Output**	**Timeline**	**Lead Org**	**Stakeholder Support**	**Resources/Risks/Dependencies**
Assess the feasibility of introducing a register to record sales, use and disposal of chemicals associated with sheep dip	Register to track sales and disposal of (cypermethrin, diazinon and amitraz)	TBC	DAFM / LAWPRO	DHLGH / National Aquatic Environment Chemicals Group (NAECG)	Resources for implementation / funding
NTIG will work with the National Hazardous Waste Management Plan 2021 – 2027 Working Group in relation to preventing toxic impacts from the handling, use and disposal of sheep dip causing water quality deteriorations	Draft recommendations for the management of sheep dip	Throughout third-cycle	NTIG	DAFM / DHLGH	Resources for implementation / funding

Aquaculture

Aqua 1	***Review of consents causing impacts:* DAFM will conduct a periodic review, and where necessary, update of controls contained in aquaculture consents.**				
Steps Necessary for Delivery	**Proposed Output**	**Timeline**	**Lead Org**	**Stakeholder Support**	**Resources/Risks/Dependencies**
Discussions between DAFM and DHLGH	Revised licences as appropriate	Q4 2024	DAFM	DHLGH / Marine Institute / EPA	
Aqua 2	*Enhanced integration of WFD into Aquaculture Consents*: **DAFM to enhance links between the aquaculture authorisation and the objectives of the Water Framework Directive.**				
Steps Necessary for Delivery	**Proposed Output**	**Timeline**	**Lead Org**	**Stakeholder Support**	**Resources/Risks/Dependencies**
DAFM and the DHLGH will engage to review how the WFD assessment process is provided for within the aquaculture licensing system	DAFM, DHLGH and MI, will work collaboratively to update aquaculture licensing guidelines/process, if required, to ensure that the WFD assessment process is provided for. DHLGH and MI will assist with guidance pertaining to the WFD assessment process, where needed	End Q4 2024	DAFM / DHLGH	Marine Institute	
Aqua 3	*Online Aquaculture licensing*: **To encourage the active involvement of all interested parties DAFM is to launch an online mapping viewer of licensed aquaculture sites in Ireland including access to licence and licence application information.**				
Steps Necessary for Delivery	**Proposed Output**	**Timeline**	**Lead Org**	**Stakeholder Support**	**Resources/Risks/Dependencies**
Development of the public aquaculture online viewer	Launch of the public aquaculture online viewer to enable access to mapping of licensed sites	Launch of public viewer in Q2 2022. Phase 2 delivery in 2024	DAFM	Marine Institute	Administrative support
Aqua 4	*Enhanced Protection for Designated Shellfish Production Areas*: **DHLGH will examine the need for amendments to legislation and whether a new management framework for shellfish waters in Ireland is needed.**				
Steps Necessary for Delivery	**Proposed Output**	**Timeline**	**Lead Org**	**Stakeholder Support**	**Resources/Risks/Dependencies**
Creation of Expert Group who will identify the technical requirements for assessing shellfish waters	Identify the technical requirements for assessing shellfish waters including agreed assessment methods and metrics	Q4 2024	DHLGH (WAU)	DAFM / Marine Institute / Uisce Éireann / EPA / SFPA / BIM	Administrative support

Draft new primary legislation for shellfish waters	New draft primary legislation to include, amongst other updates, provision for revision of existing Designated Shellfish Waters and, where appropriate, the introduction of exclusion zones around rivers/outfalls		DHLGH (WAU)	DAFM / Marine Institute / Uisce Éireann / EPA / SFPA / BIM	Administrative support
New regulations to outline shellfish areas and the specific monitoring requirements and standards	New draft regulations		DHLGH (WAU)		Administrative support
Enactment of legislation	Full enactment of the legislation developed	Q4 2026	DHLGH (WAU)		Administrative support
Aqua 5	**Complete the National Strategic Plan for Sustainable Aquaculture, including water quality measures.**				
Steps Necessary for Delivery	**Proposed Output**	**Timeline**	**Lead Org**	**Stakeholder Support**	**Resources/Risks/Dependencies**
Complete SEA, AA and Draft Plan following public consultation	Report	Q1 2022	BIM	DAFM	
Publish SEA, AA and final NSPA and submit to the EU	Strategy	Q1 2022	BIM	DAFM	

Land-Use Planning

Land-Use 1	**Finalise guidelines for the incorporation of the Water Framework Directive into the planning system and rollout of training on the new water and planning guidelines to practitioners.**				
Steps Necessary for Delivery	**Proposed Output**	**Timeline**	**Lead Org**	**Stakeholder Support**	**Resources/Risks/Dependencies**
Public Consultation to be carried out on the Water and Planning Guidance	Public Consultation on draft guidance and Strategic Environmental Assessment	Q2 2024	DHLGH (WAU/ EUIPR)		Capacity with DHLGH. Consultant support
Finalised Guidelines following public consultation	Guidance document	Q1 2025	DHLGH (WAU/ EUIPR)	Steering Group: CCMA / Local Authorities / OPR / IFI / OPW / NPWS / Southern Regional Assembly / LAWPRO / Uisce Éireann / An Bord Pleanála / EPA	

Procure appropriate resource for the development and delivery of training	Appointment of appropriate consultancy support & deliver of training course to public sector employees	Q2 2025	DHLGH (WAU/ EUIPR)	n/a	Capacity within DHLGH. Consultant support
Recurring training for new practitioners / refresher courses for existing practitioners	Full and refresher courses in line with demand	Annually	DHLGH (WAU/ EUIPR)	n/a	Capacity within DHLGH. Consultant support
Land-Use 2	**Legislative provision to give effect to the new Water and Planning Guidance to be progressed.**				
Steps Necessary for Delivery	**Proposed Output**	**Timeline**	**Lead Org**	**Stakeholder Support**	**Resources/Risks/Dependencies**
Develop legislative proposal/ Government Approval to proceed with legislative amendments / enactment of legislation	Full enactment of the legislation developed	(TBC)	DHLGH (EUIPR)	AGO	Capacity within DHLGH

Protecting and Restoring Estuarine and Coastal Waters

Coastal Action 1	**Marine Protected Areas (MPAs) which are within the areas covered by the WFD (up to one nautical mile off shore) will be incorporated into the register of protected areas under the WFD, once the legislation is enacted.**				
Steps Necessary for Delivery	**Proposed Output**	**Timeline**	**Lead Org**	**Stakeholder Support**	**Resources/Risks/Dependencies**
The enactment of stand-alone legislation to enable the identification, designation, and management of MPAs in accordance with our national ambitions and international commitments	Enactment of legislation	Q3 2024	DHLGH		
The designation of MPAs using best available science and a participatory, ecosystem-based approach	Designation of MPAs	2024-2030 ongoing	DHLGH		
The development of management plans for designated MPAs	The achievement of 30% MPA coverage by 2030	2024-2030 ongoing	DHLGH		

6. Implementation and Governance

Action 6.1	LAWPRO will oversee the development of the template for the 46 Catchment Management Work Plans by Q2 2024.				
Steps Necessary for Delivery	**Proposed Output**	**Timeline**	**Lead Org**	**Stakeholder Support**	**Resources/Risks/Dependencies**
Engagement with POMs WG	Feedback	Q2 2024 Ongoing	LAWPRO	DHLGH / EPA	
Engagement with LAWPRO on the information required for inclusion in the CMWPs		Q3 2024	All implementing bodies	LAWPRO / EPA/ DHLGH/ An Fóram Uisce / Regional Committees	LAWPRO resource to deliver the template and coordination aspects of CMWP. Resourcing limitations of implementing bodies
Implementation bodies to provide 2024 Work Programmes / Action Plans with actions at a water body scale to be trialled as part of the development of the CMWP template in the pilot catchment areas	Trial of existing work programmes/ plans as part of development of CMWP template	Q3 2024	All implementing bodies	LAWPRO / EPA / DHLGH / Regional Committees / NTIG	Meaningful engagement by stakeholders. LAWPRO resource to deliver the template and coordination aspects of CMWP. Full participation by all Implementing bodies. Resourcing limitations of implementing bodies.
Outline of template for Catchment Management Work Plans communicated	Feedback	Q3 2024	LAWPRO	EPA / DHLGH / All implementing bodies	Meaningful engagement by stakeholders. Adequate resources in place for LAWPRO
Finalise Catchment Management Work Plans for pilot catchments	Report on the trialling of template in pilot catchments	Q4 2024	LAWPRO	EPA / DHLGH / All implementing bodies	Adequate resources in place for LAWPRO
Finalise CMWP Templates and Processes	Agreed Templates and final report produced	Q4 2024	LAWPRO	EPA / DHLGH / All implementing bodies	Adequate resources in place for LAWPRO

Action 6.2	Implementing Bodies to engage with LAWPRO with the data required for their work in compiling the 46 Catchment Work Plans and also trialling the CMWP template in the 5 pilot catchments.				
Steps Necessary for Delivery	**Proposed Output**	**Timeline**	**Lead Org**	**Stakeholder Support**	**Resources/Risks/Dependencies**
Engage with LAWPRO in the development of 46 Catchment Work Plans also trialling the CMWP template in the 5 pilot catchments	Provide information as required for catchment plans and pilot catchment areas	Q3 2024	LAWPRO	IFI / OPW / Bord na Móna / DAFM / Forest Service / NPWS / LAs / Marine Institute / EPA / ASSAP / relevant implementing bodies	Resources capacity
Action 6.3	**DHLGH will establish a Programme Delivery Office to oversee and co-ordinate the many relevant bodies that manage, implement and enforce legislation and policies relevant to the Water Framework Directive.**				
Steps Necessary for Delivery	**Proposed Output**	**Timeline**	**Lead Org**	**Stakeholder Support**	**Resources/Risks/Dependencies**
Submission of business case	Business case submitted	Q1 2024	DHLGH (WAU)		
Agree structure and functions of the Delivery Office	Project delivery team structure and functions established	Q2 2024	DHLGH (WAU)		
Engagement with stakeholders on measures for implementation	Engagement structures	Q3 2024	DHLGH (WAU)		
Submission of progress reports on implementation of high level measures to NCMC	Submission of progress reports as standing item on NCMC meeting agenda	Ongoing	DHLGH (WAU)	EPA	
Coordination and publication of progress reports on implementation of programme of measures	Publication of progress reports on implementation of programme of measures	Ongoing	DHLGH (WAU)		
Action 6.4	**DHLGH will review the roles and responsibilities of implementation bodies, shifting emphasis from the sharing of information and the provision of updates to a more focused provision of high-level policy direction, monitoring implementation of the Plan, and project management.**				
Steps Necessary for Delivery	**Proposed Output**	**Timeline**	**Lead Org**	**Stakeholder Support**	**Resources/Risks/Dependencies**
Engagment with implementation bodies	Review and agree new Terms of Reference, as necessary, of the relevant implementation committees within the WFD Governance structures	Q3 2023	DHLGH (WAU)	WPAC / NCMC / Regional Committees / LAWPRO	
If necessary, issue a circular setting out the responsibilities of implementation bodies	Issuing of circular setting out the responsibilities of implementation bodies, if considered necessary	Q3 2023	DHLGH (WAU)	WPAC / NCMC / Regional Committees / LAWPRO	

Action 6.5	An enhanced programme of formal and scheduled monitoring and reporting of progress in respect of the implementation of the RBMP will be put in place.				
Steps Necessary for Delivery	**Proposed Output**	**Timeline**	**Lead Org**	**Stakeholder Support**	**Resources/Risks/Dependencies**
Engagement with EPA and implementation bodies	New monitoring and reporting arrangements for inclusion in the third RBMP. This will be assisted with the implementation of 46 catchments work plans as sub-plans to the national Plan. These will provide a basis against which to assess implementation of measures	Q3 2024	DHLGH (WAU)	EPA / LAWPRO / NCMC / Regional Committees	
Action 6.6	**National Oversight and Audit Commission (NOAC) will include appropriate water quality metrics in Key Performance Indicators for local authorities during the next review of indicators.**				
Steps Necessary for Delivery	**Proposed Output**	**Timeline**	**Lead Org**	**Stakeholder Support**	**Resources/Risks/Dependencies**
Engagement with NOAC on the inclusion of Key Performance Indicators on water quality for local authorities	Agreement on inclusion of Key Performance Indicators	Q4 2023	DHLGH (WAU)	NOAC	
Action 6.7	**Provide a continued emphasis on the full range of the regulatory mix, from awareness and education, through to norms and enforcement, with a review undertaken to ensure there is an appropriate balance in the third-cycle to ensure a greater emphasis on compliance assurance activity.**				
Steps Necessary for Delivery	Proposed Output	Timeline	Lead Org	Stakeholder Support	Resources/Risks/Dependencies
Coordinated delivery of measures through WPAC and participation in various interdepartmental / interagency working groups and committees	Implementation of measures to benefit water quality	Ongoing	DHLGH (WAU)	Other relevant Government Departments	
WPAC, NCMC and Regional Management Committees to continually review the progress in the implementation of measures	Progress Reports on Implementation	Ongoing	DHLGH (WAU)	EPA / LAWPRO / WPAC / NCMC / Regional Committees	
Mid cycle review of compliance assurance activity with particular emphasis on developments in water quality	Recommendations for improved compliance assurance activity	Q1 2025	DHLGH (WAU)	WPAC / NTIG / EPA	

Action 6.8	Specific capacity building programmes of work to be put in place to encourage the transfer of learning and knowledge.				
Steps Necessary for Delivery	**Proposed Output**	**Timeline**	**Lead Org**	**Stakeholder Support**	**Resources/Risks/Dependencies**
Review training programme necessary for the LA natural water sector	Competency framework of training courses for LA environment section staff	Q4 2023	LAWPRO	LASNTG	Adequate resources for LAWPRO. CCMA Business case review report
Roll out of LASNTG training programme	Delivery of training to all implementing body staff	Ongoing	LASNTG	LAWPRO / NIECE WG / Implementing Bodies	Adequate resources for LAWPRO and LASNTG. Sustainable funding available for training programmes
Knowledge transfer from local initiatives and projects through the different governance tiers	Learnings from development and implementation of local initiatives and projects circulated through NTIG/ NCMC/WPAC meetings	Ongoing	LAWPRO	DHLGH (WAU)	
Action 6.9	**Ensure further activation, development, and support of local level initiatives (rivers trusts, catchment partnerships) in support of the delivery of the RBMP.**				
Steps Necessary for Delivery	**Proposed Output**	**Timeline**	**Lead Org**	**Stakeholder Support**	**Resources/Risks/Dependencies**
Consideration of Resilience Project review report findings	Recommendations on developments and supports required to inform the pilot community fora	Q1 2023	LAWPRO	DHLGH	Adequate resources in place for LAWPRO
Workshops as part of the framework for the delivery of the Catchment Community Fora in 5 pilot catchments	Recommendations on developments and supports required	Q4 2023	LAWPRO	Community Fora	Adequate resources in place for LAWPRO. Meaningful engagement by stakeholders
Review of Funding models and supports to groups	Recommendations on new Funding model Framework for community engagement	Q4 2023	LAWPRO	DHLGH / Catchment partnerships / Rivers Trusts / Department of Rural and Community Development e.g. LEADER Programme	Adequate resources in place for LAWPRO. Meaningful engagement by stakeholders. Synergies and match funding including with industry

Action 6.10	The Water Forum to identify and advise the Water Policy Advisory Committee (WPAC) and Minister on the optimum level of engagement with the implementation bodies, agencies and structures for the WFD to support implementation of the third-cycle, in accordance with its functions under Article 26 of the 2017 Water Services Act (Number 29).				
Steps Necessary for Delivery	**Proposed Output**	**Timeline**	**Lead Org**	**Stakeholder Support**	**Resources/Risks/Dependencies**
Invitation of the Chairperson An Fóram Uisce to WPAC	Inclusion of Chairperson An Fóram Uisce in WPAC meetings	Q4 2023	DHLGH (WAU)		
Development of Memorandum of Understanding between An Fóram Uisce and DHLGH/WPAC	Memorandum of Understanding agreed	Q1 2024	DHLGH (WAU)	WPAC	
An Fóram Uisce to engage with Regional Structures through the Regional Management Committees	Engagement between An Fóram Uisce and Regional Structures	Ongoing	LAWPRO	Regional Management Committees / An Fóram Uisce	
Report from WPAC to An Fóram Uisce on implementation of measures	Progress Reports on Implementation	Ongoing	DHLGH (WAU)	An Fóram Uisce	
Action 6.11	**Building on the excellent work already undertaken by the EPA, LAWPRO and various other bodies, DHLGH will provide further supports for the development of a National Water focused Citizen Science Strategy for the monitoring of water quality.**				
Steps Necessary for Delivery	**Proposed Output**	**Timeline**	**Lead Org**	**Stakeholder Support**	**Resources/Risks/Dependencies**
Development of a National Water focused Citizen Science Strategy	A 5-year strategy for the 3rd Cycle RBMP	Q4 2023	Citizen Science Coordination Committee / LAWPRO	DHLGH / EPA / IFI / National Biodiversity Data Centre / second & third level institutes / other stakeholders / Education bodies	Adequate LAWPRO resources for rollout and animation. Continuous support from citizen science coordination committee. Engagement by relevant stakeholder bodies. Recommendations of National Freshwater Macroinvertebrate Citizen science working group
Rollout of the national macroinvertebrate citizen science process developed in Cycle 2	Finalisation of records database repository and IT requirements (app). Animation of the scheme. Training. Supports for community groups	Ongoing	LAWPRO	National Biodiversity Data Centre / EPA / Education bodies / Leader Programme / DRCD	Adequate LAWPRO resources for rollout and animation. Funding for animation. Engagement by community groups.

Development and production of training and citizen science support materials	Compilation of training programmes and materials including, community focused CSSI, SSIS, macroalgal citizen science handbooks and other materials	Q2 2024	LAWPRO	National Biodiversity Data Centre / EPA / Education bodies / Leader Programme / DRCD	Adequate LAWPRO resources for rollout and animation. Funding for animation.
Action 6.12	**LAWPRO to evaluate the outcome of the Resilience Project for Rivers Trusts to inform future community engagement initiatives, including on citizen science.**				
Steps Necessary for Delivery	**Proposed Output**	**Timeline**	**Lead Org**	**Stakeholder Support**	**Resources/Risks/Dependencies**
Undertake a review of the effectiveness of the resilience pilot project	Report on the outcomes of the pilot project	Q1 2023	LAWPRO	Rivers Trusts	
Consideration of the Project review report	Recommendation(s) on the level of future support to be provided to River Trust Organisations	Q2 2023	DHLGH (WAU)	LAWPRO	
Action 6.13	**LAWPRO to examine ways in which further support can be provided for the formation and capacity building of local forums to help identify and implement measures.**				
Steps Necessary for Delivery	**Proposed Output**	**Timeline**	**Lead Org**	**Stakeholder Support**	**Resources/Risks/Dependencies**
Establish a committee to design the format of a Community Forum based on Stakeholder feedback and Pilot findings	Proposed framework for establishment of Community Fora	Q2 2024	LAWPRO	DHLGH (WAU) / Programme Delivery Office / An Fóram Uisce	Adequate resources in place for LAWPRO. Appropriate delivery mechanism available. Meaningful engagement by stakeholders

Scoping exercise for the development of a framework on how to establish the Catchment Community Fora in five pilot catchments	Workshops to inform recommendations for pilot CCF in 2024: CCF Terms of Reference Supports required Delivery mechanism Relationship with existing and proposed local government, community development and public participation structures How CCF could influence the CMWP Proposals for a framework for future rollout of CCF	Q1 2024	LAWPRO	An Fóram Uisce / Rivers Trusts / Leader / PPNs / Others	Adequate resources in place for LAWPRO. Appropriate delivery mechanism available. Meaningful engagement by stakeholders
Trial different engagement methodologies in 5 pilot catchments	Evaluation of the different engagement methodologies Recommendations for the establishment of CCF during the lifetime of the third-cycle.	Q1 – Q3 2024	LAWPRO / An Fóram Uisce		
Action 6.14	**LAWPRO and DHLGH to review the operation of the Community Water Development Fund with a view to strengthening it.**				
Steps Necessary for Delivery	**Proposed Output**	**Timeline**	**Lead Org**	**Stakeholder Support**	**Resources/Risks/Dependencies**
Continue to review the operation and effectiveness of the current programme to identify learnings from the second cycle and areas for improvement	Recommendations of review implemented, including additional funding if required	Ongoing	DHLGH (WAU)	LAWPRO	
Action 6.15	**LAWPRO will facilitate public participation in the development of the Catchment Management Work Plans through workshops for the 5 pilot catchments. This will inform the development and implementation of a national approach to public participation to deliver outcomes for water, climate and nature.**				
Steps Necessary for Delivery	**Proposed Output**	**Timeline**	**Lead Org**	**Stakeholder Support**	**Resources/Risks/Dependencies**
Scoping workshops in 5 pilot catchments	Report on the findings and recommendations of the 5 pilot consultation workshops	Q2 2024	LAWPRO	All implementing bodies / AFU / Local Authorities	Meaningful engagement by stakeholders

Action 6.16	**The public participation pilots will provide learnings (which will then be implemented) on how agencies, local authorities, communities and landowners can work together to support action planning and project co-creation for a combined top-down bottom-up approach to the development and implementation of the 46 Catchment Management Work Plans.**				
Steps Necessary for Delivery	**Proposed Output**	**Timeline**	**Lead Org**	**Stakeholder Support**	**Resources/Risks/Dependencies**
Pilots to include learnings and recommendations on the public participation aspects in the development of the CMWPs	Pilot findings and recommendation report	Q3 2024	LAWPRO	DHLGH / AFU	Successful rollout of the pilots. Engagement by stakeholders. Adequate resources in place for LAWPRO
Establish a committee to design the format of a Community Forum based on Stakeholder feedback and Pilot findings	Proposed framework for public participation	Q4 2024	LAWPRO	DHLGH (WAU) / Project Delivery Office / An Fóram Uisce	Adequate resources in place for LAWPRO. Appropriate delivery mechanism available. Meaningful engagement by stakeholders
Action 6.17	**A review of the wider local authority structures will be progressed to inform future needs in the water area and to identify the appropriate level of resources and involvement required from the sector to meet WFD objectives.**				
Steps Necessary for Delivery	**Proposed Output**	**Timeline**	**Lead Org**	**Stakeholder Support**	**Resources/Risks/Dependencies**
Establish steering and oversight group	Project Board appointed	Q4 2021	CCMA	DHLGH (WAU)	
Appoint resources to carry out review	Project Team appointed	Q1 2022	CCMA	DHLGH (WAU)	Funding provided by DHLGH
Devise and agree work plan with stakeholders	Agreed work programme and timelines for review	Q1 2022	CCMA	DHLGH / EPA / Local Authorities	
Carry out quantitative and qualitative appraisal of existing local authority resources	Publish report	Q3 2022	CCMA	Local Authorities	
Carry out initial phase of the review and estimate resources required	Report to DHLGH	Q1 2023	CCMA	DHLGH / EPA / Local Authorities	Intermediate approval of Public Service Reform and Oversight Group required
Complete review and agree resources required	Report to DHLGH	Q4 2023	CCMA	DHLGH / EPA / Local Authorities	Intermediate approval of Public Service Reform and Oversight Group required

Action 6.18	**The Research Programme on Water will be continued into the third-cycle with an emphasis on water governance, economics and behavioural aspects of water protection.**				
Steps Necessary for Delivery	**Proposed Output**	**Timeline**	**Lead Org**	**Stakeholder Support**	**Resources/Risks/Dependencies**
Establish research steering group with relevant stakeholders	Stakeholders identified and research steering group established	Q1 2025	DHLGH (WAU)	LAWPRO / EPA	
Terms of Reference established and initial projects areas identified	Terms of Reference agreed and research programme established	Q2 2025	DHLGH (WAU)	LAWPRO / EPA	
Research programme launched	Publication of research papers and material	Ongoing	DHLGH (WAU)	LAWPRO / EPA	
Action 6.19	**Review to be undertaken of the Local Authority Waters Programme to identify necessary resources for the third-cycle and beyond to deliver the commitments under the WFD and future RBMPs.**				
Steps Necessary for Delivery	**Proposed Output**	**Timeline**	**Lead Org**	**Stakeholder Support**	**Resources/Risks/Dependencies**
Efficiency and Effectiveness Review to be carried out by LAWPRO	Recommendations for required staffing levels	Q3 2021	LAWPRO		
Action 6.20	**Review the outcomes of the IPA Governance Research programme on Ireland's water governance arrangements and implement their recommendations where appropriate.**				
Steps Necessary for Delivery	**Proposed Output**	**Timeline**	**Lead Org**	**Stakeholder Support**	**Resources/Risks/Dependencies**
Consider recommendations	Recommendations included in the final River Basin Management Plan	Q3 2022	DHLGH (WAU)		
Review of Terms of Reference of WPAC, NCMC and NTIG	Terms of Reference reviewed and updated if required	Q3 2024	DHLGH (WAU)	WPAC / NCMC / NTIG / EPA	
Review of role and functions of NCMC in relation to WPAC	Clarification on the relationship between WPAC and NCMC	Q3 2024	DHLGH (WAU)	WPAC / NCMC	
Establishment of Project Delivery Office	Project delivery team structure and functions established	Q3 2024	DHLGH (WAU)		
Development of Memorandum of Understanding between An Fóram Uisce and DHLGH/WPAC	Memorandum of Understanding agreed	Q3 2024	DHLGH (WAU)	WPAC / An Fóram Uisce	
Knowledge transfer from local initiatives and projects through the different governance tiers	Learnings from development and implementation of local initiatives and projects circulated through NTIG/ NCMC/WPAC meetings	Ongoing	LAWPRO	DHLGH (WAU)	

Action 6.21	**Implement the recommendations of the External Expert assessment of the Agricultural Sustainability Support and Advisory Programme (ASSAP) during the third-cycle.**				
Steps Necessary for Delivery	**Proposed Output**	**Timeline**	**Lead Org**	**Stakeholder Support**	**Resources/Risks/Dependencies**
Agree Terms of Reference for the review with stakeholders	Creation of an Expert review Panel	Completed in Q3 2021	Teagasc	DHLGH / LAWPRO / DSI / DAFM / Farming Organisations	
Carry out the review	Report and Recommendations	Completed in Q4 2021	Teagasc	DHLGH / LAWPRO / DSI / DAFM / Farming Organisations	
Implement review recommendations	Action on each of the recommendations	Ongoing	Teagasc	DHLGH / LAWPRO / DSI / DAFM / Farming Organisations	
Action 6.22	**Water protection provisions in relevant sectoral policies will be strengthened, where necessary. These include; water services policy, spatial planning policy, agricultural policy and aquaculture policy.**				
Steps Necessary for Delivery	**Proposed Output**	**Timeline**	**Lead Org**	**Stakeholder Support**	**Resources/Risks/Dependencies**
Continued engagement across departmental and interdepartmental fora	Strengthened water protection provisions included in relevant policies	Ongoing	DHLGH (WAU)	Other relevant Government Departments	
Action 6.23	**Measures that will deliver multiple policy objectives (e.g. water, biodiversity and climate adaptation/mitigation) will be identified and embedded into sectoral policies.**				
Steps Necessary for Delivery	**Proposed Output**	**Timeline**	**Lead Org**	**Stakeholder Support**	**Resources/Risks/Dependencies**
Coordinated delivery through the WPAC and participation in various interdepartmental / interagency working groups and committees	Inclusion of measures to benefit water quality and services into other sectoral policies	Ongoing	DHLGH (WAU)	Other relevant Government Departments	

7. Public and Stakeholder Engagement

Action 7.1	Create opportunities for young people to engage, upskill and use their voice for sustainable development, through youth-led and youth-focused groups, organisations and networks.				
Steps Necessary for Delivery	**Proposed Output**	**Timeline**	**Lead Org**	**Stakeholder Support**	**Resources/Risks/Dependencies**
Support citizen science initiatives to address the climate crisis, including protecting biodiversity and the environment	Citizen science initiatives launched	Ongoing	DHLGH / DFHERIS / DECC	EPA / An Taisce	
Develop an initiative to promote biodiversity across primary, post primary, and third-level sectors and ensure that these institutions play an active role in providing areas to promote biodiversity	Biodiversity initiatives launched	Ongoing	DHLGH	NPWS	
Support the engagement of local communities systematically and on a larger scale through environmental restoration projects and environmental awareness programmes	Environmental restoration projects and environmental awareness programmes launched	Ongoing	DHLGH / DRCD DECC / Local Government	NPWS / NGOs / Local communities	
Support actions for biodiversity in local areas (for example via the Local Authority Biodiversity Action Fund and joint Environment and Nature Fund)	Funding provided to locally-lead projects	Ongoing	NPWS / Community Foundation for Ireland	DHLGH	

8. Economic Analysis

Econ 1	The DHLGH to undertake an evaluation including a stakeholder consultation of the appropriateness of water reuse for agricultural purposes within Ireland and report findings in the next River Basin Management Plan.				
Steps Necessary for Delivery	**Proposed Output**	**Timeline**	**Lead Org**	**Stakeholder Support**	**Resources/Risks/Dependencies**
Prepare an evaluation of the appropriateness of water reuse for agricultural purposes within Ireland and report findings in the next River Basin Management Plan	Report for consultation	2025	DHLGH (WAU)	Relevant public bodies	
Undertake a stakeholder consultation	Report on the consultation feedback	2025/2026	DHLGH (WAU)	Relevant public bodies	
Report findings in the next River Basin Management Plan	Incorporation of the findings in the 4th RBMP	2026/2027	DHLGH (WAU)	Relevant public bodies	
Econ 2	**The cost effectiveness of new supplementary measures, such as the Water EIP and Barriers Mitigation Programme, will be analysed as soon as possible after they have been commenced and once there is sufficient progress made. The programmes will be modified, if and where necessary, to ensure that they are delivering value for money to the State.**				
Steps Necessary for Delivery	**Proposed Output**	**Timeline**	**Lead Org**	**Stakeholder Support**	**Resources/Risks/Dependencies**
Interim review	Assessment and Recommendations	End of 2025	DHLGH (WAU)	All relevant public bodies responsible for implementing	Capacity to undertake the review and support from outside public bodies
Final review at the end of cycle 3 which will inform measures design for cycle 4	Assessment of cycle 3 and Recommendations for cycle 4	End of 2027	DHLGH (WAU)	All relevant public bodies responsible for implementing	Capacity to undertake the review and support from outside public bodies

Econ 3	The economic regulator of water services (the CRU) will continue to assess and approve Uisce Éireann's costs and investment plans. This will include an assessment of Uisce Éireann's investment decisions to ensure effectiveness, efficiency and value-for-money in Uisce Éireann's expenditure. The CRU will continue to monitor and report annually on Uisce Éireann's delivery and performance in that context.				
Steps Necessary for Delivery	**Proposed Output**	**Timeline**	**Lead Org**	**Stakeholder Support**	**Resources/Risks/Dependencies**
Conduct revenue control process to review Uisce Éireann's submission and proposals, benchmark its proposed costs against comparator companies and complete a public consultation process to set revenue allowances for next revenue control period	Set appropriate revenue allowances for operating costs, capital costs and other items for the next revenue control period	The current Uisce Éireann revenue control period RC3 ends at the end of 2024. In 2023, the CRU will commence engagement with UÉ for the Revenue Control period RC4, which will run from 2025- 2029	CRU	DHLGH / EPA / UÉ	
Monitor Uisce Éireann's expenditure and delivery of outputs and outcomes through its annual Capital Expenditure Monitoring Programme and metrics through the annual Performance Assessment Framework	Publication of annual CRU Capital Monitoring Reports and Performance Assessment Framework reports	Annual assessments and publication of reports	CRU	UÉ	
Monitor customer service and policy initiatives through regular regulatory reporting	Publication of CRU's Energy and Water Monitoring report comprising data from UÉ's regular Customer Handbook, Capex Monitoring, Connection Charging, First Fix, Domestic and Non-Domestic usage data reports	Published every 6 months. Annual Energy and Water Monitoring report usually in August. Half yearly usually in December	CRU	UÉ	

Continued harmonisation of Uisce Éireann's charging structures. Following on from the establishment of a harmonised suite of connection charges and non-domestic tariffs. Similar work is being progressed by the CRU and Uisce Éireann for trade effluent charges. The regime will continue to be based on ensuring full cost recovery from non-domestic water and wastewater users	Establish an interim trade effluent charging framework in 2023 following public consultation	2023	CRU	UÉ	Data constraints
Econ 4	**Uisce Éireann to implement the National Water Resources Plan and associated regional plans and to maintain national water and wastewater capacity registers to ensure security of supply and sufficient capacity in drinking and wastewater networks to inform decisions on balanced regional development in line with the National Planning Framework.**				
Steps Necessary for Delivery	**Proposed Output**	**Timeline**	**Lead Org**	**Stakeholder Support**	**Resources/Risks/Dependencies**
Publication of four Regional Water Resources Plans	Adoption of the four Regional Water Resource Plans	2023	Uisce Éireann		
Review and update of register inputs	Wastewater treatment capacity register. Water supply capacity register	Completed, to be updated annually	Uisce Éireann		
Econ 5	**When approved, Uisce Éireann to implement domestic excess use and non-domestic charging.**				
Steps Necessary for Delivery	**Proposed Output**	**Timeline**	**Lead Org**	**Stakeholder Support**	**Resources/Risks/Dependencies**
Regulations associated with 'Additional Household Allowances' and 'Medical Exemptions' enacted	Relevant Regulations enacted	TBD	DHLGH		
Mobilise project implementation team	Plan and timeframe for delivery of Household Water Conservation completed	TBD	Uisce Éireann	DHLGH / CRU	
Complete Design of the Customer Journey and systems solution	End-to-end customer journey and systems and processes solutions designed and agreed	TBD	Uisce Éireann	DHLGH / CRU	
Implement the solution designed, commence the customer journey and operationalise the required processes	Full solution delivered, relevant systems and processes updated, and new Customer Management Capability operational	TBD	Uisce Éireann	DHLGH / CRU	

Continue to operate the Non Domestic Tariff Framework for Non-Domestic customers	Bills issued to Non Domestic Customers as part of business as usual activities	Ongoing	Uisce Éireann		
Econ 6	**The Minister will publish a report based on an economic assessment on the potential for a natural capital / freshwater ecosystem services approach to protecting water resources, including the need for new economic instruments and protection of freshwater and marine ecosystem services.**				
Steps Necessary for Delivery	**Proposed Output**	**Timeline**	**Lead Org**	**Stakeholder Support**	**Resources/Risks/Dependencies**
The Minister will arrange for the preparation and publication of a report based on an economic assessment on the potential for a natural capital / freshwater ecosystem services approach to protecting water resources, including the need for new economic instruments and protection of freshwater and marine ecosystem services	Published report	End of 2027	DHLGH (WAU)	Relevant public bodies	This will likely be outsourced. Risks relate to the capacity and competence to deliver the output
Econ 7	**The Minister will maintain a funding stream to upgrade and take in charge towns and villages without wastewater networks to improve the wastewater needs of rural villages that are outside of the current Uisce Éireann collection network.**				
Steps Necessary for Delivery	**Proposed Output**	**Timeline**	**Lead Org**	**Stakeholder Support**	**Resources/Risks/Dependencies**
Maintain a funding stream to upgrade and take in charge towns and villages without wastewater networks to improve the wastewater needs of rural villages that are outside of the current Uisce Éireann collection network	Delivered upgrades in rural towns and villages and the number taken in charge	Ongoing	DHLGH (Rural Water)	Local authorities and Uisce Éireann	Available resources
Econ 8	**Uisce Éireann will update the current Water Services Strategic Plan to cover the 25 year period of water services management up to 2050.**				
Steps Necessary for Delivery	**Proposed Output**	**Timeline**	**Lead Org**	**Stakeholder Support**	**Resources/Risks/Dependencies**
Review of current Plan with input from key stakeholders	Water Services Strategic Plan Review document	Completed October 2020	Uisce Éireann	DHLGH	
Preparation of updated WSSP based on recommendations	Water Services Strategic Plan submitted to DHLGH for approval by the Minister	Q2 2024	Uisce Éireann	DHLGH / CRU / EPA / each Local Authority / each Regional Assembly	

Econ 9	**Finalise the review of rural water services and produce a rural water services strategic plan including a national rural water resources plan for the rural water sector.**				
Steps Necessary for Delivery	**Proposed Output**	**Timeline**	**Lead Org**	**Stakeholder Support**	**Resources/Risks/Dependencies**
Finalise the review of the wider resources and investment needs of the Rural Water Sector	Rural Water Working Group to make recommendations to the Minister	Q3 2024	DHLGH (Rural Water)	Rural Water Working Group / Local Authorities / NFGWS	
Econ 10	**Implement the policy as set out in "Irish Water – Towards a national, publicly-owned, regulated, water services utility" so that Uisce Éireann has integrated the day to day operation and delivery of water services into its own organisational structure, in place of the current Service Level Agreements, on a phased basis.**				
Steps Necessary for Delivery	**Proposed Output**	**Timeline**	**Lead Org**	**Stakeholder Support**	**Resources/Risks/Dependencies**
Implement the policy as set on in "Irish Water – Towards a national, publicly-owned, regulated, water services utility"	Integration of the day to day operation and delivery of water services into Uisce Éireann's organisational structure	Ongoing	Uisce Éireann	Local Authorities	
Econ 11	**Where additional targeted measures are identified as necessary to address gaps in WFD environmental objectives for cycle 3, as part of the mid-term progress review of the Programme of Measures in 2025, DHLGH will oversee the preparation of project proposals for funding under the new Infrastructure, Climate and Nature Fund.**				
Steps Necessary for Delivery	**Proposed Output**	**Timeline**	**Lead Org**	**Stakeholder Support**	**Resources/Risks/Dependencies**
Mid-term review of Programme of Measures	Assessment and Recommendations	End of 2025	DHLGH (WAU)	All relevant public bodies responsible for implementing	Capacity to undertake the review and support from outside public bodies
Identification of project proposals for funding	Approval of projects under Infrastructure, Climate and Nature Fund	Q1 2026	DHLGH (WAU)	All relevant public bodies responsible for implementing	

www.gov.ie/RBMP

Department of Housing,
Local Government and Heritage



Rialtas na hÉireann
Government of Ireland

Rialtas na hÉireann
Government of Ireland

Water Action Plan 2024

A River Basin Management Plan for Ireland

Appendix 3: Correlation table with Directive text, including Annex VII

Prepared by the Department of Housing, Local Government and Heritage
www.gov.ie/RBMP

Article / Annex	WFD Requirement	See the following section in the RBMP
Article 4 (3)	3. Member States may designate a body of surface water as artificial or heavily modified, when: (a) the changes to the hydromorphological characteristics of that body which would be necessary for achieving good ecological status would have significant adverse effects on: i. the wider environment; ii. navigation, including port facilities, or recreation; iii. activities for the purposes of which water is stored, such as drinking-water supply, power generation or irrigation; iv. water regulation, flood protection, land drainage, or v. other equally important sustainable human development activities; (b) the beneficial objectives served by the artificial or modified characteristics of the water body cannot, for reasons of technical feasibility or disproportionate costs, reasonably be achieved by other means, which are a significantly better environmental option. Such designation and the reasons for it shall be specifically mentioned in the river basin management plans required under Article 13 and reviewed every six years.	Chapter 3: Setting Environmental Objectives - *"Environmental Objectives for water bodies designated as Artificial or Heavily Modified Water Bodies"*
Article 4(4)	4. The time limits laid down in paragraph 1 may be extended for the purposes of phased achievement of the objectives for bodies of water, provided that no further deterioration occurs in the status of the affected body of water when all the following conditions are met: (a) Member States determine that all necessary improvements in the status of bodies of water cannot reasonably be achieved within the timescales set out in that paragraph for at least one of the following reasons: (i) the scale of improvements required can only be achieved in phases exceeding the timescale, for reasons of technical feasibility; (ii) completing the improvements within the timescale would be disproportionately expensive; (iii) natural conditions do not allow timely improvement in the status of the body of water. (b) Extension of the deadline, and the reasons for it, are specifically set out and explained in the river basin management plan required under Article 13. (c) Extensions shall be limited to a maximum of two further updates of the river basin management plan except in cases where the natural conditions are such that the objectives cannot be achieved within this period. (d) A summary of the measures required under Article 11 which are envisaged as necessary to bring the bodies of water progressively to the required status by the extended deadline, the reasons for any significant delay in making these measures operational, and the expected timetable for their implementation are set out in the river basin management plan. A review of the implementation of these measures and a summary of any additional measures shall be included in updates of the river basin management plan.	Chapter 3: Setting Environmental Objectives - *"What we want to achieve and the deadline of 2027"*
Article 4(5)	(d) the establishment of less stringent environmental objectives, and the reasons for it, are specifically mentioned in the river basin management plan required under Article 13 and those objectives are reviewed every six years.	Chapter 3: Setting Environmental Objectives - *"Less Stringent Objectives"*

Article / Annex	WFD Requirement	See the following section in the RBMP
Article 4(6)	6. Temporary deterioration in the status of bodies of water shall not be in breach of the requirements of this Directive if this is the result of circumstances of natural cause or force majeure which are exceptional or could not reasonably have been foreseen, in particular extreme floods and prolonged droughts, or the result of circumstances due to accidents which could not reasonably have been foreseen, when all of the following conditions have been met: (a) all practicable steps are taken to prevent further deterioration in status and in order not to compromise the achievement of the objectives of this Directive in other bodies of water not affected by those circumstances; (b) the conditions under which circumstances that are exceptional or that could not reasonably have been foreseen may be declared, including the adoption of the appropriate indicators, are stated in the river basin management plan; (c) the measures to be taken under such exceptional circumstances are included in the programme of measures and will not compromise the recovery of the quality of the body of water once the circumstances are over; (d) the effects of the circumstances that are exceptional or that could not reasonably have been foreseen are reviewed annually and, subject to the reasons set out in paragraph 4(a), all practicable measures are taken with the aim of restoring the body of water to its status prior to the effects of those circumstances as soon as reasonably practicable, and (e) a summary of the effects of the circumstances and of such measures taken or to be taken in accordance with paragraphs (a) and (d) are included in the next update of the river basin management plan.	Chapter 3: Setting Environmental Objectives - *"What we want to achieve and the deadline of 2027"*
Article 4(7)	7. Member States will not be in breach of this Directive when: — failure to achieve good groundwater status, good ecological status or, where relevant, good ecological potential or to prevent deterioration in the status of a body of surface water or groundwater is the result of new modifications to the physical characteristics of a surface water body or alterations to the level of bodies of groundwater, or — failure to prevent deterioration from high status to good status of a body of surface water is the result of new sustainable human development activities and all the following conditions are met: a. all practicable steps are taken to mitigate the adverse impact on the status of the body of water; b. the reasons for those modifications or alterations are specifically set out and explained in the river basin management plan required under Article 13 and the objectives are reviewed every six years; c. the reasons for those modifications or alterations are of overriding public interest and/or the benefits to the environment and to society of achieving the objectives set out in paragraph 1 are outweighed by the benefits of the new modifications or alterations to human health, to the maintenance of human safety or to sustainable development, and d. the beneficial objectives served by those modifications or alterations of the water body cannot for reasons of technical feasibility or disproportionate cost be achieved by other means, which are a significantly better environmental option.	Chapter 3: Setting Environmental Objectives - *"New modifications to surface water bodies & groundwater levels and new sustainable human development activities"*

Article / Annex	WFD Requirement	See the following section in the RBMP
Article 9(2)	2. Member States shall report in the river basin management plans on the planned steps towards implementing paragraph 1 which will contribute to achieving the environmental objectives of this Directive and on the contribution made by the various water uses to the recovery of the costs of water services.	Chapter 8: Economic Analysis of Water Use: *"Application of Article 9 (Recovery of Costs)"*
Article 9(4)	4. Member States shall not be in breach of this Directive if they decide in accordance with established practices not to apply the provisions of paragraph 1, second sentence, and for that purpose the relevant provisions of paragraph 2, for a given water-use activity, where this does not compromise the purposes and the achievement of the objectives of this Directive. Member States shall report the reasons for not fully applying paragraph 1, second sentence, in the river basin management plans.	Chapter 8: Economic Analysis of Water Use: *"Update and review of the Economic Analysis"*
Annex II		
1.3. reference conditions Part (VI)	(i) Where it is not possible to establish reliable type-specific reference conditions for a quality element in a surface water body type due to high degrees of natural variability in that element, not just as a result of seasonal variations, then that element may be excluded from the assessment of ecological status for that surface water type. In such circumstances Member States shall state the reasons for this exclusion in the river basin management plan.	Chapter 2: Status of Ireland's Water Bodies, linking out to the EPA's monitoring programme on www.epa.ie
Annex V		
1.3. Monitoring of ecological status and chemical status for surface waters	Member States shall provide a map or maps showing the surface water monitoring network in the river basin management plan. 1.3.4 Estimates of the confidence and precision attained by the monitoring system used shall be stated in the river basin management plan.	Chapter 2: Status of Ireland's Water Bodies: *"Monitoring Programme"*, linking out to the EPA's monitoring programme on www.epa.ie
2.2 Monitoring of groundwater quantitative status	2.2.1. The groundwater monitoring network shall be established in accordance with the requirements of Articles 7 and 8. The monitoring network shall be designed so as to provide a reliable assessment of the quantitative status of all groundwater bodies or groups of bodies including assessment of the available groundwater resource. Member States shall provide a map or maps showing the groundwater monitoring network in the river basin management plan.	Chapter 2: Status of Ireland's Water Bodies: "*Monitoring Programme"*, linking out to the EPA's monitoring programme on www.epa.ie
2.4.5	Presentation of groundwater chemical status These maps shall be included in the river basin management plan.	Chapter 2: Status of Ireland's Water Bodies: "*Monitoring Programme"*, linking out to the EPA's monitoring programme on www.epa.ie
2.5	Presentation of Groundwater Status Member States shall provide in the river basin management plan a map showing for each groundwater body or groups of groundwater bodies both the quantitative status and the chemical status of that body or group of bodies, colour-coded in accordance with the requirements of points 2.2.4 and 2.4.5. Member States may choose not to provide separate maps under points 2.2.4 and 2.4.5 but shall in that case also provide an indication in accordance with the requirements of point 2.4.5 on the map required under this point, of those bodies which are subject to a significant and sustained upward trend in the concentration of any pollutant or any reversal in such a trend.	Chapter 2: Status of Ireland's Water Bodies: "*Monitoring Programme"*, linking out to the EPA's monitoring programme on www.epa.ie

Article / Annex	WFD Requirement	See the following section in the RBMP
Annex VII: River Basin Management Plans		
A.1	A general description of the characteristics of the river basin district required under Article 5 and Annex II. This shall include: 1.1. for surface waters: • mapping of the location and boundaries of water bodies, • mapping of the ecoregions and surface water body types within the river basin, • identification of reference conditions for the surface water body types; 1.2. for groundwaters: • mapping of the location and boundaries of groundwater bodies	Chapter 2: Status of Ireland's Water Bodies, linking out to www.Catchments.ie
A.2	A summary of significant pressures and impact of human activity on the status of surface water and groundwater, including: • estimation of point source pollution, • estimation of diffuse source pollution, including a summary of land use, • estimation of pressures on the quantitative status of water including abstractions, • analysis of other impacts of human activity on the status of water;	Chapter 2: Status of Ireland's Water Bodies, linking out to full EPA characterisation report
A.3	Identification and mapping of protected areas as required by Article 6 and Annex IV. • Article 6 requires the establishment of a register of protected areas. • Annex IV describes the content or the register of protected areas and the summary that is required in river basin management plans.	Chapter 3: Setting Environmental Objectives: "*Environmental Objectives for Protected Areas*", linking out to www.catchments.ie
A.4	A map of the monitoring networks established for the purposes of Article 8 and Annex V, and a presentation in map form of the results of the monitoring programmes carried out under those provisions for the status of: 4.1. surface water (ecological and chemical); 4.2. groundwater (chemical and quantitative); 4.3. protected areas; • Article 8 requires the establishment and operation of programmes for monitoring water status. • Annex V sets out further details on monitoring and classification of status, and for presentation of maps in the river basin management plans.	Chapter 2: Status of Ireland's Water Bodies: "*Monitoring Programme*", linking out to the EPA's monitoring programme on www.epa.ie
A.5	A list of the environmental objectives established under Article 4 for surface waters, groundwaters and protected areas, including in particular identification of instances where use has been made of Article 4(4), (5), (6) and (7), and the associated information required under that Article;	Chapter 3: Setting Environmental Objectives - "*What we want to achieve and the deadline of 2027*"
A.6	A summary of the economic analysis of water use as required by Article 5 and Annex III;	Chapter 8: Economic Analysis of Water Use: *"Update and review of the Economic Analysis"*

Article / Annex	WFD Requirement	See the following section in the RBMP
A.7	A summary of the programme or programmes of measures adopted under Article 11, including the ways in which the objectives established under Article 4 are thereby to be achieved; 7.1. a summary of the measures required to implement Community legislation for the protection of water; 7.2. a report on the practical steps and measures taken to apply the principle of recovery of the costs of water use in accordance with Article 9; 7.3. a summary of the measures taken to meet the requirements of Article 7; 7.4. a summary of the controls on abstraction and impoundment of water, including reference to the registers and identifications of the cases where exemptions have been made under Article 11(3)(e); 7.5. a summary of the controls adopted for point source discharges and other activities with an impact on the status of water in accordance with the provisions of Article 11(3)(g) and 11(3)(i); 7.6. an identification of the cases where direct discharges to groundwater have been authorised in accordance with the provisions of Article 11(3)(j); 7.7. a summary of the measures taken in accordance with Article 16 on priority substances; 7.8. a summary of the measures taken to prevent or reduce the impact of accidental pollution incidents; 7.9. a summary of the measures taken under Article 11(5) for bodies of water which are unlikely to achieve the objectives set out under Article 4; 7.10. details of the supplementary measures identified as necessary in order to meet the environmental objectives established; 7.11. details of the measures taken to avoid increase in pollution of marine waters in accordance with Article 11(6);	Chapter 5: Programme of Measures to 2027
A.8	A register of any more detailed programmes and management plans for the river basin district dealing with particular sub-basins, sectors, issues or water types, together with a summary of their contents;	n/a
A.9	A summary of the public information and consultation measures taken, their results and the changes to the plan made as a consequence;	Chapter 7: Public and Stakeholder Engagement
A.10	A list of competent authorities in accordance with Annex I; Annex I requires information for the competent authority on: • name and address; • geographical coverage of the river basin district; • legal status; • responsibilities	Chapter 6: Implementation and Governance
A.11	The contact points and procedures for obtaining the background documentation and information referred to in Article 14(1), and in particular details of the control measures adopted in accordance with Article 11(3)(g) and 11(3)(i) and of the actual monitoring data gathered in accordance with Article 8 and Annex V.	Chapter 7: Public and Stakeholder Engagement, linking out to the EPA's monitoring programme on www.epa.ie

Article / Annex	WFD Requirement	See the following section in the RBMP
B	The first update of the river basin management plan and all subsequent updates shall also include: 1. a summary of any changes or updates since the publication of the previous version of the river basin management plan, including a summary of the reviews to be carried out under Article 4(4), (5), (6) and (7); 2. an assessment of the progress made towards the achievement of the environmental objectives, including presentation of the monitoring results for the period of the previous plan in map form, and an explanation for any environmental objectives which have not been reached; 3. a summary of, and an explanation for, any measures foreseen in the earlier version of the river basin management plan which have not been undertaken; 4. a summary of any additional interim measures adopted under Article 11(5) since the publication of the previous version of the river basin management plan.	Chapter 3: Setting Environmental Objectives

www.gov.ie/RBMP

Department of Housing,
Local Government and Heritage

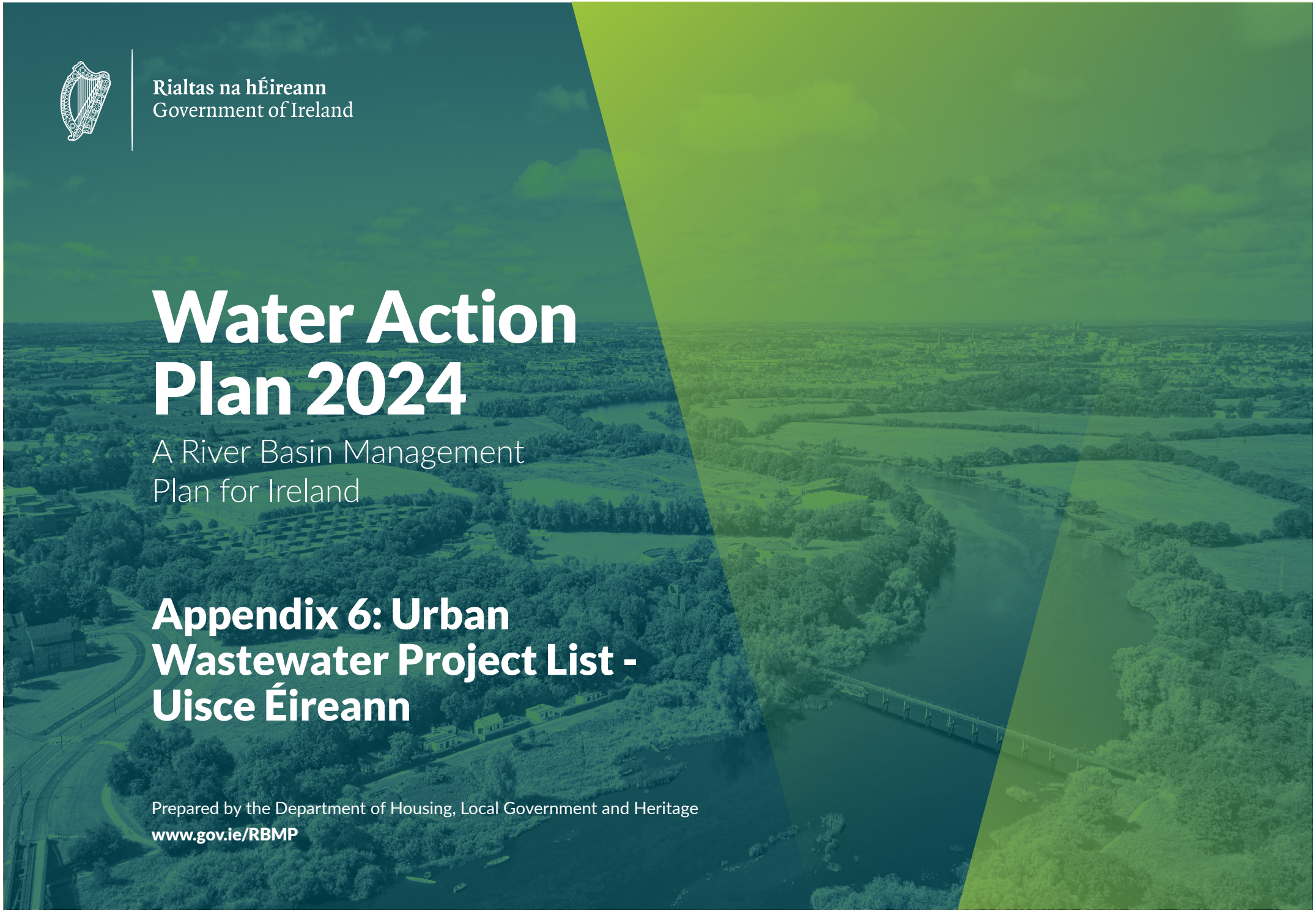
Rialtas na hÉireann
Government of Ireland

Rialtas na hÉireann
Government of Ireland

Water Action Plan 2024

A River Basin Management Plan for Ireland

Appendix 6: Urban Wastewater Project List - Uisce Éireann



Prepared by the Department of Housing, Local Government and Heritage

www.gov.ie/RBMP

County	Agglomeration Code	Agglomeration Name	Treatment Plant or Project name	Portfolio	Estimated Completion Year	RBMP List Category	When delivered is a project likely to help address a UWW significant pressure?
Carlow	A0094-01	Ballinkillen	Ballinkillen	WWAG	Not scheduled	2b	
Carlow	D0248-01	Borris Waste Water Works	Borris WWTP	WWAG	2023	1	
Carlow	D0028-01	Carlow	Carlow Wastewater Treatment Plant	WWAG	2029	2a	
Carlow	D0028-01	Carlow	Carlow - Bestfield Ps (Carlow)	WWBG	2028	2a	
Carlow	D0028-01	Carlow	Walls Forge PS	WWBG	post 2029	2a	
Carlow	A0544-01	Clonegal	Clonegal WWTP Upgrade (STVGP) (OR/FS)	WWAG	Not scheduled	2b	
Carlow	A0097-01	Kildavin Wastewater Treatment Plant	Kildavin WWTP Upgrade	WWAG	2026	1	✖
Carlow	D0090-01	Muinebheag and Leighlinbridge	Muinebheag and Leighlinbridge Wastewater Treatment Plant	WWAG	2025	1	✖
Carlow	D0090-01	Muinebheag and Leighlinbridge	Muinebheag & Leighlinbridge - Royal Oak West Wwps	WWBG	2028	2a	✖
Carlow	A0099-01	Tinryland Wastewater Treatment Plant	Tinryland WWTP	WWAG	2026	1	
Carlow	D0091-01	Tullow Wastewater Treatment Plant	Tullow Wastewater Treatment Plant	WWAG	2023	1	✖
Carlow	D0091-01	Tullow Wastewater Treatment Plant	Wastewater Network (New) - Tullow	WWBG	2025	1	✖
Cavan	D0085-01	Bailieborough	Bailieborough Wastewater Treatment Plant	WWAG	2027	1	✖
Cavan	D0501-01	Ballinagh	Ballinagh WWTP Upgrade (STVGP) (OR/FS)	WWAG	Not scheduled	2b	
Cavan	D0253-01	Ballyconnell	Ballyconnell WWTP Upgrade (STVGP)	WWAG	2024	1	
Cavan	D0253-01	Ballyconnell	Ballyconnell (Cavan) - Amberwood Manor Ps (Ballyconnell (Cavan))	WWBG	2028	2a	
Cavan	D0496-01	Ballyhaise	Ballyhaise WWTP Upgrade (STVGP) (OR/FS)	WWAG	Not scheduled	2b	
Cavan	D0256-01	Ballyjamesduff	Ballyjamesduff Wastewater Treatment Plant	WWAG	2026	1	✖
Cavan	D0498-01	Blacklion	Blacklion WWTP Upgrade (NRRP-SM2) (OR/FS)	WWAG	Not scheduled	2b	✖
Cavan	D0020-01	Cavan	Cavan WWTP	WWAG	2023	1	
Cavan	D0082-01	Cootehill	Cootehill Wastewater Treatment Plant	WWAG	post 2029	2a	✖
Cavan	D0499-01	Killeshandra	Killeshandra WWTP upgrade (OR/FS)	WWAG	Not scheduled	2b	✖

County	Agglomeration Code	Agglomeration Name	Treatment Plant or Project name	Portfolio	Estimated Completion Year	RBMP List Category	When delivered is a project likely to help address a UWW significant pressure?
Cavan	D0500-01	Kilnaleck	Kilnaleck WWTP	WWAG	2025	1	
Cavan	D0083-01	Kingscourt	Kingscourt Wastewater Treatment Plant	WWAG	post 2029	2a	✖
Cavan	D0252-01	Mullagh	Mullagh WWTP Upgrade (STVGP)	WWAG	2029	2a	✖
Cavan	D0495-01	Shercock	Shercock WWTP Upgrade (NRRP-SM2)	WWAG	Not scheduled	2b	✖
Cavan	A0303-01	Swanlinbar Waste Water Works	Swanlinbar Waste Water Works - Furnaceland Gardens Ps (Swanlinbar)	WWBG	2028	2a	
Cavan	D0255-01	Virginia	Virginia Wastewater Treatment Plant	WWAG	2026	1	✖
Cavan	D0255-01	Virginia	Virginia - Mill Creek (Behind Main St.) Ps (Virginia)	WWBG	2028	2a	
Clare	A0081-01	Ballycannon	Ballycannon WWTP	WWAG	2024	1	
Clare	D0327-01	Ballyvaughan Wastewater Treatment Plant	Ballyvaughan Wastewater Treatment Plant	WWAG	2027	1	
Clare	D0199-01	Clareabbey	Clareabbey Wastewater Treatment Plant	WWAG	post 2029	2a	
Clare	D0322-01	Clarecastle	Clarecastle Wastewater Network	WWBG	2024	1	
Clare	D0324-01	Doonbeg	Doonbeg WWTP Upgrade (STVGP)	WWAG	Not scheduled	2b	
Clare	D0048-01	Ennis North	LIHAF/MUHDS Growth Programme (Wastewater) - Claureen, Ennis	WWBG	2022	1	
Clare	D0048-01	Ennis North	Clonroadmore Wastewater Treatment Plant	WWAG	post 2029	2a	
Clare	D0048-01	Ennis North	Ennis North	WWBG	Not scheduled	2b	✖
Clare	D0081-01	Ennistymon	Ennistymon Wastewater Treatment Plant	WWAG	post 2029	2a	
Clare	D0422-01	Inagh	Inagh Wastewater Treatment Plant	WWAG	2025	1	
Clare	A0454-01	Kildysert	Kildysert WWTP Upgrade (NCAP)	WWAG	2029	2a	
Clare	A0079-01	Kilfenora	Kilfenora Wastewater Treatment Plant	WWAG	2023	1	
Clare	D0078-01	Kilkee	Kilkee Wastewater Treatment Plant	WWAG	2027	1	
Clare	D0078-01	Kilkee	Kilkee - Victoria Ps-Rising Main Upgrade	WWBG	2023	1	
Clare	A0091-01	Kilmihil	Kilmihil WWTP	WWAG	post 2029	2a	✖
Clare	D0075-01	Kilrush	Kilrush Wastewater Treatment Plant	WWAG	2024	1	
Clare	D0080-01	Lahinch	Lahinch Wastewater Treatment Plant	WWAG	2029	2a	

County	Agglomeration Code	Agglomeration Name	Treatment Plant or Project name	Portfolio	Estimated Completion Year	RBMP List Category	When delivered is a project likely to help address a UWW significant pressure?
Clare	D0430-01	Liscannor	Liscannor Wastewater Treatment Plant	WWAG	2023	1	
Clare	D0077-01	Lisdoonvarna	Lisdoonvarna WWTP Upgrade (NRRP-SM2) (OR/FS)	WWAG	Not scheduled	2b	✖
Clare	D0321-01	Miltown Malbay	Milltown/Malbay WWTP Upgrade (STVGP) (OR/FS)	WWAG	Not scheduled	2b	
Clare	D0079-01	Newmarket on Fergus	Newmarket-on-Fergus Wastewater Treatment Plant	WWAG	2026	1	
Clare	D0320-01	Tulla	Tulla	WWAG	Not scheduled	2b	✖
Cork	D0049-01	Ballincollig	Ballincollig Wastewater Network	WWBG	2027	1	
Cork	D0049-01	Ballincollig	Wastewater Network (New) - Ballingcollig Wastewater Network	WWBG	2027	1	
Cork	A0361-01	Ballincurrig and Lisgoold	Ballincurrig & Lisgoold WWTP Upgrade (STVGP) - Phase 1 Lisgoold	WWAG	2026	1	
Cork	D0472-01	Ballineen-Enniskeane	Ballineen/Enniskean WWTP Upgrade (STVGP)	WWAG	2024	1	
Cork	D0431-01	Ballingeary	Ballingeary WWTP Upgrade (NRRP-SM2) (OR/FS)	WWAG	Not scheduled	2b	✖
Cork	A0440-01	Ballinspittle & Garrettstown	Ballinspittle WWTP Upgrade (STVGP)	WWAG	post 2029	2a	
Cork	D0516-01	Ballycotton	Ballycotton Wastewater Treatment Plant	WWAG	2025	1	
Cork	A0326-01	Ballydesmond	Ballydesmond WWTP Upgrade (NCAP)	WWAG	post 2029	2a	
Cork	A0343-01	Ballynoe	Ballynoe	WWAG	Not scheduled	2b	
Cork	D0168-01	Bantry	Bantry Wastewater Treatment Plant	WWAG	2027	1	
Cork	D0168-01	Bantry	Bantry WW Network - Untreated Discharges	WWBG	post 2029	2a	
Cork	D0541-01	Belgooly	Belgooley WWTP Upgrade (STVGP)	WWAG	Not scheduled	2b	
Cork	D0043-01	Blarney	Blarney Strategic Network	WWBG	2029	2a	✖
Cork	D0043-01	Blarney	Blarney	WWAG	Not scheduled	2b	✖
Cork	D0437-01	Boherbue and Environs	Boherbue Wastewater Treatment Plant	WWAG	2024	1	
Cork	D0303-01	Buttevant	Buttevant	WWBG	Not scheduled	2b	✖
Cork	D0044-01	Carrigtwohill and Environs	Carrigtwohill WW Network Upgrade	WWBG	2029	2a	✖

County	Agglomeration Code	Agglomeration Name	Treatment Plant or Project name	Portfolio	Estimated Completion Year	RBMP List Category	When delivered is a project likely to help address a UWW significant pressure?
Cork	D0044-01	Carrigtwohill and Environs	Carrigtwohill and Environs	WWAG	Not scheduled	2b	✖
Cork	A0324-01	Castlemaginer	Castlemagner WWTP Upgrade (STVGP)	WWAG	Not scheduled	2b	✖
Cork	D0134-01	Castlemartyr	Castlemartyr Wastewater Treatment Plant	WWAG	2027	1	✖
Cork	D0297-01	Castletownbere	Castletownbere Wastewater Treatment Plant	WWAG	2022	1	
Cork	D0468-01	Castletownshend	Castletownsend Wastewater Treatment Plant	WWAG	2023	1	
Cork	D0204-01	Charleville and Environs	Charleville	WWAG	Not scheduled	2b	✖
Cork	D0444-01	Churchtown and Environs	Churchtown WWTP Upgrade (STVGP) (OR/FS)	WWAG	Not scheduled	2b	
Cork	D0298-01	Cloyne	Cloyne Wastewater Treatment Plant	WWAG	post 2029	2a	
Cork	D0427-01	Coachford	Coachford Sewerage Scheme - Wastewater Treatment Plant	WWAG	2022	1	
Cork	A0342-01	Cullen	Cullen	WWAG	Not scheduled	2b	✖
Cork	D0426-01	Dripsey	Dripsey Sewerage Scheme - Network and Wastewater Treatment Plant	WWAG	2022	1	
Cork	D0160-01	Dunmanway	Wastewater Network (Upgrade) - Dunmanway	WWBG	2028	2a	✖
Cork	D0160-01	Dunmanway	Dunmanway Ww Network Upgrade	WWBG	2028	2a	✖
Cork	D0058-01	Fermoy	Fermoy Wastewater Network	WWBG	2024	1	
Cork	D0058-01	Fermoy	Glanmire Brigde Wastewater Pumping Station	WWBG	2023	1	
Cork	D0058-01	Fermoy	Fermoy WW Network Upgrades	WWBG	2028	2a	
Cork	D0058-01	Fermoy	Fermoy WWTP Upgrade (LTCGP) (OR/FS)	WWAG	Not scheduled	2b	
Cork	D0450-01	Glanworth	Glanworth WWTP CM	WWAG	2024	1	
Cork	D0450-01	Glanworth	Glanworth WWTP Upgrade (STVGP) (OR/FS)	WWAG	Not scheduled	2b	
Cork	D0515-01	Glenville	Glenville	WWAG	Not scheduled	2b	✖
Cork	A0443-01	Halfway	Halfway WWTP Upgrade (NCAP) (OR/FS)	WWAG	Not scheduled	2b	
Cork	A0349-01	Inchigeelagh	Inchigeelagh Wastewater Treatment Plant	WWAG	2023	1	
Cork	D0429-01	Innishannon	Innishannon Sewerage Scheme - Wastewater Treatment Plant Upgrade	WWAG	2023	1	
Cork	D0203-01	Kanturk	Kanturk WWTP Upgrade (OR/FS)	WWAG	Not scheduled	2b	✖

County	Agglomeration Code	Agglomeration Name	Treatment Plant or Project name	Portfolio	Estimated Completion Year	RBMP List Category	When delivered is a project likely to help address a UWW significant pressure?
Cork	D0447-01	Killavullen and Environs	Killavullen and Environs	WWAG	Not scheduled	2b	✖
Cork	D0329-01	Killeens	Killeens WWTP Upgrade (STVGP)	WWAG	Not scheduled	2b	✖
Cork	A0435-01	Killumney	Killumney WWTP Upgrade (STVGP)	WWAG	Not scheduled	2b	
Cork	D0132-01	Kinsale	Kinsale Outfall Extension	WWBG	2022	1	
Cork	D0132-01	Kinsale	Kinsale - Summercove Ps (Kinsale)	WWBG	2028	2a	
Cork	D0132-01	Kinsale	Kinsale WWTP Upgrade (LTCGP) (OR/FS)	WWAG	Not scheduled	2b	
Cork	A0327-01	Lombardstown & Environs	Lombardstown WWTP Upgrade (NCAP) (OR/FS)	WWAG	Not scheduled	2b	
Cork	D0126-01	Macroom	Macroom Wastewater Treatment Plant	WWAG	2025	1	
Cork	D0052-01	Mallow	Mallow Sewerage Scheme - Network	WWBG	2023	1	
Cork	D0052-01	Mallow	Mallow Wastewater Treatment Plant	WWAG	2023	1	
Cork	D0052-01	Mallow	Mallow Ww Network (Kennel Hill)	WWBG	2023	1	
Cork	D0056-01	Midleton	Network Extensions (Wastewater) - Midleton	WWBG	2024	1	
Cork	D0056-01	Midleton	Midleton Wastewater Treatment Plant	WWBG	post 2029	2a	
Cork	D0056-01	Midleton	Midleton Wastewater Transfer Project	WWBG	2026	1	
Cork	D0056-01	Midleton	Midleton Wastewater Network Upgrades	WWBG	post 2029	2a	✖
Cork	D0202-01	Mitchelstown	Mitchelstown Sewerage Scheme - Network Upgrade and Wastewater Treatment Plant Inlet works	WWAG	2022	1	
Cork	D0202-01	Mitchelstown	Mitchelstown - Brigown Ps (Mitchelstown)	WWBG	2028	2a	
Cork	D0202-01	Mitchelstown	Mitchelstown WWTP CM	WWAG	2022	1	
Cork	D0202-01	Mitchelstown	Mitchelstown WWTP Phase 2 - WWDL upgrade (OR/FS)	WWAG	Not scheduled	2b	✖
Cork	D0333-01	Newmarket and Environs	Newmarket Wastewater Treatment Plant	WWAG	2029	2a	
Cork	D0057-01	Ringaskiddy	Ringaskiddy - Crosshaven Car Park Ps (Ringaskiddy)	WWBG	2028	2a	
Cork	D0172-01	Rosscarbery-Owenahincha	Rosscarbery/Owenahincha Wastewater Treatment Plant	WWAG	2029	2a	
Cork	D0166-01	Skibbereen	Skibbereen	WWBG	Not scheduled	2b	✖

County	Agglomeration Code	Agglomeration Name	Treatment Plant or Project name	Portfolio	Estimated Completion Year	RBMP List Category	When delivered is a project likely to help address a UWW significant pressure?
Cork	D0201-01	Watergrasshill	Watergrasshill	WWBG	Not scheduled	2b	✖
Cork	D0201-01	Watergrasshill	Watergrasshill	WWAG	Not scheduled	2b	✖
Cork	D0423-01	Whitegate-Aghada	Whitegate/Aghada Wastewater Treatment Plant	WWAG	2024	1	
Cork	D0139-01	Youghal	Youghal - Front Strand WW Network Upgrades	WWBG	post 2029	2a	
Cork	D0139-01	Youghal	Youghal - South Abbey WW Network Upgrades	WWBG	post 2029	2a	
Cork City	D0049-01	Ballincollig	Ballincollig WWTP Upgrade (RC4) (OR/FS)	WWAG	Not scheduled	2b	
Cork City	D0033-01	Cork City	Wastewater Network (New) - Ballyvolane Pumping Station, Cork	WWBG	2024	1	
Cork City	D0033-01	Cork City	Ballyvolane and Monard Wastewater Network	WWBG	post 2029	2a	
Cork City	D0033-01	Cork City	Cork City WW Network Upgrade - Silversprings SWO	WWBG	2029	2a	
Cork City	D0033-01	Cork City	Cork City Ww Network - Little Island/Glanmire (No.2)	WWBG	post 2029	2a	
Cork City	D0033-01	Cork City	Cork City Ww Network - Pinecroft (No.3)	WWBG	post 2029	2a	
Cork City	D0033-01	Cork City	Cork City Ww Network - Douglas (No.4)	WWBG	post 2029	2a	
Cork City	D0033-01	Cork City	Cork City Ww Network - Mahon (No.5)	WWBG	post 2029	2a	
Cork City	D0033-01	Cork City	Cork City Ww Network (Contract No.6) - Tramore Valley	WWBG	post 2029	2a	
Cork City	D0033-01	Cork City	Cork City Ww Network (Contract No.7) - Bishopstown	WWBG	post 2029	2a	
Cork City	D0033-01	Cork City	Cork City Ww Network (Contract No.8) - Blackpool	WWBG	post 2029	2a	
Cork City	D0033-01	Cork City	Cork City Ww Network (Contract No.9) - Shandon & Sundays Well	WWBG	post 2029	2a	
Cork City	D0033-01	Cork City	Cork City - Ardfallen Road WW Network Upgrades	WWBG	2025	1	
Cork City	D0033-01	Cork City	Cork City WW Network (Project No. 10) - North Quays	WWBG	post 2029	2a	
Cork City	D0033-01	Cork City	Cork City WW Network (Project No. 11) - City Centre	WWBG	post 2029	2a	

County	Agglomeration Code	Agglomeration Name	Treatment Plant or Project name	Portfolio	Estimated Completion Year	RBMP List Category	When delivered is a project likely to help address a UWW significant pressure?
Cork City	D0033-01	Cork City	Cork City WW Network (Project No. 12) - City South	WWBG	post 2029	2a	
Cork City	D0033-01	Cork City	Cork City	WWBG	Not scheduled	2b	✖
Cork City	D0033-01	Cork City	Cork City	WWAG	Not scheduled	2b	✖
Corl	D0438-01	Bweeng and Environs	Bweeng and Environs	WWAG	Not scheduled	2b	✖
Donegal	A0306-01	Annagary	Annagary - Annagary Nr. 2 Ps (Wwtp Entrance)	WWBG	post 2029	2a	
Donegal	A0294-01	Ballintra	Ballintra WWTP	WWAG	post 2029	2a	
Donegal	D0120-01	Ballybofey-Stranorlar	Ballybofey/Stranorlar Sewerage Scheme - Wastewater Network	WWBG	2025	1	✖
Donegal	D0351-01	Ballyliffen	Ballyliffen Wastewater Treatment Plant	WWAG	post 2029	2a	
Donegal	D0532-01	Bridgend	Bridgend Wastewater Treatment Plant	WWAG	post 2029	2a	✖
Donegal	D0125-01	Buncrana	Buncrana Wastewater Network	WWBG	2025	1	
Donegal	D0125-01	Buncrana	Buncrana Wastewater Treatment Plant	WWAG	2028	2a	
Donegal	D0531-01	Burnfoot	Burnfoot Wastewater Treatment Plant	WWAG	post 2029	2a	✖
Donegal	A0446-01	Burtonport	Burtonport Wastewater Treatment Plant	WWAG	2024	1	
Donegal	D0113-01	Carndonagh-Malin	Carndonagh/Mailn WWTP Upgrade (LTCGP)	WWAG	post 2029	2a	
Donegal	D0523-01	Carrigart	Carrigart Wastewater Treatment Plant	WWAG	2026	1	
Donegal	D0514-01	Castlefinn	Castlefinn - Kennedy'S WWPS Upgrade	WWBG	2028	2a	
Donegal	A0486-01	Cloghan/Brockagh	Cloghan/Brockagh	WWAG	Not scheduled	2b	✖
Donegal	D0344-01	Convoy	Convoy WW Network Upgrades	WWBG	2028	2a	
Donegal	A0525-01	Coolatee Housing Scheme	Coolatee Wastewater Treatment Plant	WWAG	2024	1	
Donegal	D0534-01	Creeslough	Creeslough	WWAG	Not scheduled	2b	✖
Donegal	A0364-01	Curragh	Curragh Housing Scheme	WWAG	Not scheduled	2b	✖
Donegal	D0135-01	Donegal Town	Donegal Town - The Pier WWPS Upgrade	WWBG	post 2029	2a	
Donegal	D0135-01	Donegal Town	Donegal Town	WWAG	Not scheduled	2b	
Donegal	D0350-01	Downings	Downings WWTP Upgrade (LTVGP)	WWAG	post 2029	2a	
Donegal	D0211-01	Dunfanaghy-Portnablagh	Dunfanaghy-Portnablagh Wastewater Treatment Plant	WWAG	post 2029	2a	

County	Agglomeration Code	Agglomeration Name	Treatment Plant or Project name	Portfolio	Estimated Completion Year	RBMP List Category	When delivered is a project likely to help address a UWW significant pressure?
Donegal	A0556-01	Dunkineeley	Dunkineeley - Dunkineely Ps (Dunkineeley)	WWBG	2028	2a	
Donegal	D0535-01	Fahan	Fahan Wastewater Treatment Plant	WWAG	2028	2a	
Donegal	D0343-01	Falcarragh	Falcarragh Wastewater Treatment Plant	WWAG	post 2029	2a	
Donegal	tbc	Gweedore	Gweedore Sewerage Scheme - Wastewater Treatment Plant	WWAG	2023	1	
Donegal	multiple	Killea, Carrigans	INTERREG VA SWELL Project	WWAG	2024	1	
Donegal	A0445-01	Kerrykeel	Kerrykeel Wastewater Treatment Plant	WWAG	2023	1	✖
Donegal	D0520-02	Kilcar	Kilcar Wastewater Treatment Plant	WWAG	2023	1	
Donegal	D0520-02	Kilcar	Kilcar WW Network Upgrades	WWBG	2028	2a	
Donegal	D0518-01	Killygordon	Killygordon WWTP Upgrade (NRRP-SM2) (OR/FS)	WWAG	Not scheduled	2b	✖
Donegal	D0513-01	Kilmacrennan	Kilmacrennan Sewerage Scheme	WWAG	2026	1	✖
Donegal	D0519-01	Manorcunningham	Manorcunningham	WWAG	Not scheduled	2b	✖
Donegal	D0342-01	Milford	Milford Wastewater Network	WWBG	2025	1	✖
Donegal	D0522-01	Mountcharles	Mountcharles Sewerage Scheme (part of Donegal Towns and Villages Bundle)	WWAG	2026	1	
Donegal	D0212-01	Moville	Moville Wastewater Treatment Plant	WWAG	post 2029	2a	✖
Donegal	tbc	Muff	Muff Wastewater Treatment Plant	WWAG	post 2029	2a	
Donegal	D0349-01	Newtowncunningham	Newtowncunningham WWTP Upgrade (STVGP) (OR/FS)	WWAG	Not scheduled	2b	
Donegal	A0461-01	Pettigo	Pettigo WWTP Upgrade	WWAG	2026	1	
Donegal	D0341-01	Ramelton	Ramelton Wastewater Network	WWBG	2025	1	✖
Donegal	D0209-01	Raphoe	Raphoe WWTP Upgrade (OR/FS)	WWAG	Not scheduled	2b	✖
Donegal	D0345-01	Rathmullan	Milford, Ramelton and Rathmullan Wastewater Treatment Plant	WWAG	2025	1	✖
Donegal	D0538-01	St Johnston	St. Johnston Secondary Discharge Upgrade	WWBG	2028	2a	
Dublin City	D0034-01	Ringsend	LIHAF/MUHDS Growth Programme (Wastewater) - Poolbeg West SDZ, Dublin	WWBG	2027	1	
Dublin City	D0034-01	Ringsend	Grand Canal Tunnel Sewer Outfall Extension	WWBG	2028	2a	
Dublin City	D0034-01	Ringsend	Liffey Siphon (Rosie Hackett Bridge)	WWBG	post 2029	2a	

County	Agglomeration Code	Agglomeration Name	Treatment Plant or Project name	Portfolio	Estimated Completion Year	RBMP List Category	When delivered is a project likely to help address a UWW significant pressure?
Dublin City	D0034-01	Ringsend	Ringsend Wastewater Treatment Plant Upgrade	WWAG	2025	1	✖
Dublin City	D0034-01	Ringsend	LIHAF/MUHDS Growth Programme (Wastewater) - Belmayne Wastewater Network	WWBG	2022	1	
Dublin City	D0034-01	Ringsend	Wastewater Network Upgrade - Walkinstown (Local Network Reinforcement)	WWBG	2026	1	
Dublin City	D0034-01	Ringsend	Wastewater Network Upgrade - Santry Pumping Station Upgrade (Local Network Reinforcement)	WWBG	2026	1	
Dublin City	D0034-01	Ringsend	Wastewater Network (Upgrade) - Ballymun Regeneration. Sillogue Area	WWBG	2023	1	
Dublin City	D0034-01	Ringsend	WW Network Upgrade: Railway Avenue & O'Donoghue Street, Inchicore, Dublin 8	WWBG	post 2029	2a	
Dublin City	D0034-01	Ringsend	Dollymount WWPS Upgrade	WWBG	2029	2a	
Dublin City	D0034-01	Ringsend	Bayview Ww Network Upgrade	WWBG	post 2029	2a	
Dublin City	D0034-01	Ringsend	Ringsend - Mayor St Ps (Ringsend)	WWBG	2024	1	
Dublin City	D0034-01	Ringsend	Rathmines & Pembroke: Ailesbury WWPS Upgrade	WWBG	post 2029	2a	
Dublin City	D0034-01	Ringsend	Dublin City Centre Ww Network Upgrades	WWBG	post 2029	2a	
Dublin City	D0034-01	Ringsend	Navan Road WW Network Upgrade	WWBG	post 2029	2a	
Dublin City	D0034-01	Ringsend	North Fringe Sewer & NDDS Reinforcement	WWBG	post 2029	2a	
Dublin City	D0034-01	Ringsend	Ringsend WWTP Inlet Works Remediation Work Package 2	WWAG	post 2029	2a	
Dublin City	D0034-01	Ringsend	North Fringe & NDDS Sewer Reinforcement - Finglas PS & Network Upgrades	WWBG	post 2029	2a	
Dublin City	D0034-01	Ringsend	North Fringe & NDDS Sewer Reinforcement - Ballymun PS & Network Upgrades	WWBG	post 2029	2a	
Dun Laoghaire-Rathdown	D0034-01	Ringsend	Local Network Reinforcement Project - Johnstown Road	WWBG	2022	1	
Dun Laoghaire-Rathdown	D0034-01	Ringsend	Local Network Reinforcement Project - Landscape Road	WWBG	2024	1	
Dun Laoghaire-Rathdown	D0034-01	Ringsend	Wastewater Network Upgrade - Ballyogan, Dublin (Local Network Reinforcement)	WWBG	2028	2a	

County	Agglomeration Code	Agglomeration Name	Treatment Plant or Project name	Portfolio	Estimated Completion Year	RBMP List Category	When delivered is a project likely to help address a UWW significant pressure?
Dun Laoghaire-Rathdown	D0034-01	Ringsend	Sandyford / Stillorgan Network Upgrade	WWBG	2028	2a	
Dun Laoghaire-Rathdown	D0034-01	Ringsend	West Pier-Windsor Terrace Network Upgrade	WWBG	post 2029	2a	
Dun Laoghaire-Rathdown	D0034-01	Ringsend	West Pier Ww Network Upgrade	WWBG	post 2029	2a	
Dun Laoghaire-Rathdown	D0038-01	Shanganagh-Bray	Local Network Reinforcement Project - DLRCC	WWBG	2024	1	
Dun Laoghaire-Rathdown	D0038-01	Shanganagh-Bray	Network Extensions (Wastewater) - Woodbrook, Shanganagh	WWBG	2025	1	
Dun Laoghaire-Rathdown	D0038-01	Shanganagh-Bray	Wastewater Network Upgrade - Moreen, Sandyford (Local Network Reinforcement)	WWBG	2026	1	
Dun Laoghaire-Rathdown	D0038-01	Shanganagh-Bray	Foxrock WW Network Upgrades	WWBG	post 2029	2a	
Dun Laoghaire-Rathdown	D0038-01	Shanganagh-Bray	Shanganangh Ww Network Upgrade	WWBG	post 2029	2a	
Dun Laoghaire-Rathdown	D0038-02	Shanganagh-Bray	Shanganagh-Bray	WWBG	Not scheduled	2b	✖
Fingal	D0023-01	Balbriggan	Balbriggan - Skerries Harbour Ps (Balbriggan)	WWBG	2028	2a	
Fingal	A0108-01	Ballyboghil	Ballyboghil WWTP Upgrade (STVGP) (OR/FS)	WWAG	Not scheduled	2b	
Fingal	A0107-01	Colecot Cottages	Colecot Cottages WWTP Upgrade (NRRP-SM2) (OR/FS)	WWAG	Not scheduled	2b	✖
Fingal	D0021-01	Malahide	Malahide South Network Reinforcement	WWBG	2028	2a	
Fingal	D0021-01	Malahide	Malahide WW Network Upgrades	WWBG	post 2029	2a	
Fingal	D0021-01	Malahide	Malahide	WWAG	Not scheduled	2b	✖
Fingal	D0021-01	Mallaranny	Mallaranny	WWAG	Not scheduled	2b	
Fingal	A0106-01	Oldtown	Oldtown WWTP	WWAG	2026	1	✖
Fingal	D0114-01	Portrane, Donabate, Rush, Lusk	Network Extensions (Wastewater) - Donabate Road	WWBG	2024	1	

County	Agglomeration Code	Agglomeration Name	Treatment Plant or Project name	Portfolio	Estimated Completion Year	RBMP List Category	When delivered is a project likely to help address a UWW significant pressure?
Fingal	D0034-01	Ringsend	GDRDP: Blanchardstown Sewerage Scheme (Phase 2) - Contract 2 (Duplication of 9C Sewer & Storage)	WWBG	2022	1	
Fingal	D0034-01	Ringsend	Doldrum Bay Wastewater Network	WWBG	2027	1	
Fingal	D0034-01	Ringsend	Local Network Reinforcement Project - Portmarnock	WWBG	2026	1	
Fingal	D0034-01	Ringsend	Naul WWTP Upgrade (STVGP)	WWAG	2027	1	
Fingal	D0034-01	Ringsend	Wastewater Network Upgrade - Quay St, Balbriggan (Local Network Reinforcement)	WWBG	2024	1	
Fingal	D0034-01	Ringsend	Portmarnock Strand WWPS Upgrade	WWBG	post 2029	2a	
Fingal	D0034-01	Ringsend	North Fringe & NDDS Sewer Reinforcement - Sutton PS Capital Maintenance Upgrade	WWBG	post 2029	2a	
Fingal	D0024-01	Swords	Wastewater Network Upgrade - Fosterstown, Fingal (Local Network Reinforcement)	WWBG	2023	1	
Fingal	D0024-01	Swords	Wastewater Network Upgrade - Turnapin Rising Main Upgrade, Fingal (Local Network Reinforcement)	WWBG	2024	1	
Fingal	D0024-01	Swords	Swords WWTP CM	WWAG	2029	2a	
Fingal	D0024-01	Swords	Balheary Road Swords Flow Diversion	WWBG	post 2029	2a	
Fingal	D0024-01	Swords	Swords WWTP Upgrade (LTCGP) (OR/FS)	WWAG	Not scheduled	2b	✖
Galway	A0548-01	Ahascragh	Ahascragh Wastewater Treatment Plant	WWAG	2024	1	✖
Galway	D0193-01	Athenry	Athenry Wastewater Network	WWBG	2025	1	
Galway	D0193-01	Athenry	Athenry WWTP Upgrade (PAL) (OR/FS)	WWAG	Not scheduled	2b	✖
Galway	D0032-01	Ballinasloe Town and Environs	Ballinasloe Secondary Discharge Upgrade	WWBG	2028	2a	
Galway	D0032-01	Ballinasloe Town and Environs	Ballinasloe - Cleaghmore Ps (Ballinasloe)	WWBG	2028	2a	
Galway	D0032-01	Ballinasloe Town and Environs	Ballinasloe WWTP	WWAG	2025	1	
Galway	D0371-01	Ballygar	Ballygar WWTP Upgrade (STVGP)	WWAG	2026	1	
Galway	A0105-01	Ballymoe	Ballymoe WWTP	WWAG	post 2029	2a	✖

County	Agglomeration Code	Agglomeration Name	Treatment Plant or Project name	Portfolio	Estimated Completion Year	RBMP List Category	When delivered is a project likely to help address a UWW significant pressure?
Galway	D0388-01	Carraroe	Carraroe WWTP (UTAS)	WWAG	post 2029	2a	
Galway	A0554-01	Eyrecourt	Eyrecourt Wastewater Treatment Plant	WWAG	post 2029	2a	✖
Galway	D0050-01	Galway	Galway Strategic Drainage Study	WWBG	Not scheduled	2b	
Galway	D0050-01	Galway	Oranmore Ps Upgrade	WWBG	post 2029	2a	
Galway	D0195-01	Gort	Gort WWTP Upgrade	WWAG	Not scheduled	2b	✖
Galway	A0522-01	Kilronan Cottages	Kilronan Public Toilets WWTP	WWAG	post 2029	2a	
Galway	D0276-01	Kinvara	Kinvara	WWAG	Not scheduled	2b	✖
Galway	A0531	Leenane	Leenane	WWAG	Not scheduled	2b	
Galway	D0194-01	Loughrea	Wastewater Network (Upgrade) - Loughrea	WWBG	2028	2a	✖
Galway	D0194-01	Loughrea	Loughrea WWTP Upgrade (LTCGP) (OR/FS)	WWAG	Not scheduled	2b	✖
Galway	D0219-01	Mountbellew	Mountbellew WWTP Upgrade	WWAG	post 2029	2a	✖
Galway	D0191-01	Moycullen	Moycullen WWTP Upgrade (NRRP-SM2) (OR/FS)	WWAG	Not scheduled	2b	✖
Galway	D0196-01	Portumna	Portumna - Green Isle Ps (Portumna)	WWBG	2028	2a	
Galway	D0196-01	Portumna	Portumna - Marina, Portumna Ps (Portumna)	WWBG	2028	2a	
Galway	A0115-01	Roundstone	Roundstone Wastewater Treatment Plant and Network	WWAG	2029	2a	
Galway	D0396-01	Spiddal	Spiddal Wastewater Treatment Plant	WWAG	2024	1	
Galway	D0031-01	Tuam	Milltown WWPS Upgrade	WWBG	2028	2a	
Galway	D0031-01	Tuam	Tuam - Parkmore Ps (Tuam)	WWBG	2028	2a	
Galway	A0111-01	Woodford	Woodford - NCAP	WWAG	post 2029	2a	
Galway City	D0050-01	Galway	LIHAF/MUHDS Growth Programme (Wastewater) - Ardaun, Galway City	WWBG	2025	1	
GDD	tbc	tbc	Greater Dublin Drainage Project (GDD)	WWAG	post 2029	2a	
Kerry	D0417-01	Abbeydorney	Abbeydorney WWTP Upgrade (NRRP-SM2) (OR/FS)	WWAG	Not scheduled	2b	✖
Kerry	D0183-01	Ballybunion	Ballybunion - Womens Strand Ps (Ballybunion)	WWBG	2029	2a	
Kerry	D0418-01	Ballyduff	Ballyduff	WWAG	Not scheduled	2b	✖
Kerry	D0459-01	Ballylongford	Ballylongford WW Network Upgrade	WWBG	post 2029	2a	

County	Agglomeration Code	Agglomeration Name	Treatment Plant or Project name	Portfolio	Estimated Completion Year	RBMP List Category	When delivered is a project likely to help address a UWW significant pressure?
Kerry	D0459-01	Ballylongford	Ballylongford	WWAG	Not scheduled	2b	
Kerry	A0230-01	Barraduff	Kilcummin Wastewater Network	WWBG	2025	1	
Kerry	D0181-01	Cahersiveen	Cahersiveen - Reenrusheen Road Wwps 2	WWBG	2028	2a	
Kerry	D0461-01	Castlegregory	Castlegregory WWTP Upgrade (STVGP)	WWAG	Not scheduled	2b	
Kerry	D0180-01	Castleisland	Castleisland Wastewater Treatment Plant	WWAG	post 2029	2a	
Kerry	A0087-01	Dungeagan/ Ballinskelligs	Ballinskelligs Wwps - Dungeagan Ballinskelligs	WWBG	2028	2a	
Kerry	D0284-01	Fenit	Fenit Wastewater Treatment Plant	WWAG	2029	2a	
Kerry	D0286-01	Glenbeigh	Glenbeigh WWTP Upgrade (STVGP)	WWAG	post 2029	2a	
Kerry	D0184-01	Kenmare	Kenmare Wastewater Treatment Plant	WWAG	2025	1	
Kerry	D0184-01	Kenmare	Kenmare - Pier Road Ps (Kenmare)	WWBG	2028	2a	
Kerry	D0037-01	Killarney	Killarney Ww Network Upgrade	WWBG	post 2029	2a	
Kerry	D0037-01	Killarney	Killarney WWTP Upgrade (RC4) (OR/FS)	WWAG	Not scheduled	2b	✖
Kerry	D0421-01	Knightstown	Knightstown WWTP	WWAG	2024	1	
Kerry	D0179-01	Listowel	Listowel	WWAG	Not scheduled	2b	✖
Kerry	D0179-01	Listowel WWTP	Listowel Ww Network Upgrade	WWBG	post 2029	2a	✖
Kerry	A0026-01	Moyvane	Moyvane	WWAG	Not scheduled	2b	✖
Kerry	D0285-01	Sneem	Sneem - Sneem Ps (Sneem)	WWBG	2029	2a	
Kerry	D0040-01	Tralee	Tralee Ww Network Upgrades	WWBG	post 2029	2a	✖
Kildare	D0493-01	Allenwood	Allenwood WW Network Upgrade	WWBG	post 2029	2a	
Kildare	D0493-01	Allenwood	Allenwood WWTP Update (STVGP) (OR/FS)	WWAG	Not scheduled	2b	
Kildare	D0003-01	Athy	Athy WWTP Upgrade (LTCGP) (OR/FS)	WWAG	Not scheduled	2b	
Kildare	A0129-01	Ballitore	Ballitore WWTP upgrade (NRRP-SM2) (OR/FS)	WWAG	Not scheduled	2b	✖
Kildare	D0236-01	Castledermot	Castledermot - Skenagun Ps, Dublin Road (Castledermot)	WWBG	2023	1	
Kildare	A0127-01	Castleroe West	Castleroe West	WWAG	Not scheduled	2b	✖
Kildare	A0044-01	Castletown	Castletown Wastewater Pumping Station and Rising Main Upgrade	WWBG	2027	1	

County	Agglomeration Code	Agglomeration Name	Treatment Plant or Project name	Portfolio	Estimated Completion Year	RBMP List Category	When delivered is a project likely to help address a UWW significant pressure?
Kildare	D0242-01	Coill Dubh	Coill Dubh WWTP Upgrade (NRRP-SM2) (OR/FS)	WWAG	Not scheduled	2b	✖
Kildare	D0244-01	Derrinturn	Derrinturn WWTP Upgrade (STVGP)	WWAG	2027	1	✖
Kildare	D0004-01	Lower Liffey Valley Regional Sewerage Scheme	Leixlip Transfer Pipeline	WWBG	2023	1	
Kildare	D0004-01	Lower Liffey Valley Regional Sewerage Scheme	Local Network Reinforcement Project - Celbridge	WWBG	2024	1	
Kildare	D0004-01	Lower Liffey Valley Regional Sewerage Scheme	Network Extensions (Wastewater) - Celbridge (Ballyoulster)	WWBG	2024	1	
Kildare	D0004-01	Lower Liffey Valley Regional Sewerage Scheme	Network Extensions (Wastewater) - Kilcock, Boycetown	WWBG	2025	1	
Kildare	D0004-01	Lower Liffey Valley Regional Sewerage Scheme	LIHAF/MUHDS Growth Programme (Wastewater) - East Maynooth, Co. Kildare	WWBG	2026	1	
Kildare	D0004-01	Lower Liffey Valley Regional Sewerage Scheme	Maynooth Transfer Pipeline	WWBG	2026	1	
Kildare	D0004-01	Lower Liffey Valley Regional Sewerage Scheme	Wastewater Network Upgrade - Crodaun, Kildare (Local Network Reinforcement)	WWBG	2024	1	
Kildare	D0004-01	Lower Liffey Valley Regional Sewerage Scheme	Lower Liffey Valley Ww Network Upgrades	WWBG	post 2029	2a	
Kildare	D0004-01	Lower Liffey Valley Regional Sewerage Scheme	Maynooth Main PS	WWBG	2025	1	
Kildare	D0177-01	Monasterevin Town	Monasterevin Town	WWBG	Not scheduled	2b	✖
Kildare	A0100-01	Newbridge	Wastewater Network Upgrade - Newbridge North (Local Network Reinforcement)	WWBG	2024	1	

County	Agglomeration Code	Agglomeration Name	Treatment Plant or Project name	Portfolio	Estimated Completion Year	RBMP List Category	When delivered is a project likely to help address a UWW significant pressure?
Kildare	A0113-01	Nurney	Nurney WWTP Upgrade (STVGP) (OR/FS)	WWAG	Not scheduled	2b	
Kildare	D0175-01	Rathangan	Rathangan WWTP Upgrade (LTCGP) (OR/FS)	WWAG	Not scheduled	2b	✖
Kildare	D0175-01	Rathangan	Rathangan Ww Network (I/I Reduction)	WWBG	2024	1	✖
Kildare	D0234-01	Robertstown	Robertstown WWTP	WWAG	2023	1	
Kildare	A0134-01	Timolin	Timolin WWTP Upgrade (STVGP)	WWAG	Not scheduled	2b	
Kildare	D0002-01	Upper Liffey Valley Sewerage Scheme	Upper Liffey Valley Sewerage Scheme (Phase 3) - Contract 2B (Network)	WWBG	2022	1	
Kildare	D0002-01	Upper Liffey Valley Sewerage Scheme	Loughbollard Ps Clane	WWBG	2023	1	
Kildare	D0002-01	Upper Liffey Valley Sewerage Scheme	Lower Liffey Valley Regional Sewerage Scheme - Kilcock Main Ps-Rising Main Upgrade	WWBG	2023	1	
Kildare	D0002-01	Upper Liffey Valley Sewerage Scheme	Osberstown WWTP Upgrade (LTCGP) (OR/FS)	WWAG	Not scheduled	2b	
Kilkenny	D0530-01	Ballyhale-Knocktopher	Ballyhale-Knocktopher Wastewater Treatment Plant	WWAG	2028	2a	✖
Kilkenny	D0530-01	Ballyhale-Knocktopher	Ballyhale-Knocktopher - Knocktopher Village Ps	WWBG	2027	1	
Kilkenny	D0400-01	Bennettsbridge	Bennettsbridge WWTP Upgrade (STVGP)	WWAG	post 2029	2a	
Kilkenny	D0159-01	Callan	Callan	WWAG	Not scheduled	2b	
Kilkenny	D0149-01	Castlecomer	Castlecomer - The Square WWPS Upgrade	WWBG	2028	2a	
Kilkenny	D0149-01	Castlecomer	Castlecomer WWTP Upgrade (NRRP-SM2) (OR/FS)	WWAG	Not scheduled	2b	✖
Kilkenny	D0526-01	Freshford	Freshford Ww Network (I/I Reduction)	WWBG	2025	1	✖
Kilkenny	D0526-01	Freshford	Kilkenny Ww Network Upgrade	WWBG	post 2029	2a	✖
Kilkenny	D0155-01	Graignuenamanagh Tinnahinch	Graignamanagh - Main Ps (Graignamanagh)	WWBG	2028	2a	
Kilkenny	D0018-01	Kilkenny City and Environs	Kilkenny City And Environs - Talbotsinch Ps (Kilkenny City And Environs)	WWBG	2028	2a	
Kilkenny	A0155-01	Kilmaganny	Kilmaganny WWTP	WWAG	2024	1	✖
Kilkenny	D0339-01	Paulstown	Paulstown WWTP Upgrade (STVGP) (OR/FS)	WWAG	Not scheduled	2b	
Kilkenny	A0550-01	Stonyford	Stonyford	WWAG	Not scheduled	2b	

County	Agglomeration Code	Agglomeration Name	Treatment Plant or Project name	Portfolio	Estimated Completion Year	RBMP List Category	When delivered is a project likely to help address a UWW significant pressure?
Kilkenny	D0336-01	Urlingford	Urlingford - Togher Crescent Wwps	WWBG	2028	2a	
Laois	D0156-01	Abbeyleix	Abbeyleix - Sweetview Ps (Abbeyleix Pss)	WWBG	2028	2a	
Laois	D0384-01	Ballinakill	Ballinakill WWTP Upgrade (STVGP) (OR/FS)	WWAG	Not scheduled	2b	
Laois	D0385-01	Ballyroan	Ballyroan WWTP Upgrade (STVGP)	WWAG	post 2029	2a	✖
Laois	D0290-01	Borris-in-Ossory	Borris-in-Ossory WWTP Upgrade (STVGP)	WWAG	Not scheduled	2b	
Laois	D0387-01	Castletown	Castletown (Laois) Wastewater Treatment Plant	WWAG	2023	1	✖
Laois	D0386-01	Clonaslee	Clonaslee - Bellair Ps (Clonaslee Pss)	WWBG	2028	2a	
Laois	A0136-01	Coolanagh	Coolanagh	WWAG	Not scheduled	2b	✖
Laois	D0289-01	Durrow	Bridge WWPS Durrow	WWBG	post 2029	2a	
Laois	A0153-01	Kileen	Kileen	WWAG	Not scheduled	2b	✖
Laois	D0152-01	Mountmellick	Mountmellick - Ballacollig Ps (Mountmellick Pss)	WWBG	2023	1	
Laois	D0152-01	Mountmellick	Mountmellick	WWAG	Not scheduled	2b	✖
Laois	D0158-01	Portarlington	Portarlington WWTP Upgrade (LTCGP) (OR/FS)	WWAG	Not scheduled	2b	✖
Laois	D0158-01	Portarlington	Portarlington DAP	WWBG	post 2029		✖
Laois	D0001-01	Portlaoise	Portlaoise Wastewater Treatment Plant	WWAG	post 2029	2b	✖
Laois	D0288-01	Rathdowney	Rathdowney WWTP Upgrade (NRRP-SM2) (OR/FS)	WWAG	Not scheduled	2b	✖
Leitrim	D0281-01	Ballinamore	Ballinamore - Swalinbar Rd-Pairc Fea Ps(Ballinamore)	WWBG	2028	2a	
Leitrim	D0281-01	Ballinamore	Ballinamore WWTP	WWAG	2025	1	
Leitrim	A0273-01	Carrigallen	Carrigallen WWTP Upgrade (STVGP)	WWAG	2029	2a	
Leitrim	A0275-01	Dromod	Dromod WWTP Upgrade (NCAP)	WWAG	2029	2a	
Leitrim	D0144-01	Drumshanbo	Drumshanbo - Drumduff North Ps (Drumshanbo)	WWBG	2028	2a	
Leitrim	D0144-01	Drumshanbo	Drumshanbo	WWAG	Not scheduled	2b	✖
Leitrim	D0280-01	Kinlough	Kinlough - Melvin Fields Ps (Kinlough)	WWBG	2028	2a	
Leitrim	D0150-01	Manorhamilton	Manorhamilton - Lurganboy Rd/Miltown Wwps	WWBG	2028	2a	
Leitrim	D0150-01	Manorhamilton	Manorhamilton - Bundoran Rd Manor Ps(Manorhamilton)	WWBG	2028	2a	

County	Agglomeration Code	Agglomeration Name	Treatment Plant or Project name	Portfolio	Estimated Completion Year	RBMP List Category	When delivered is a project likely to help address a UWW significant pressure?
Leitrim	D0277-01	Mohill	Mohill WWTP Upgrade (NRRP-SM2) (OR/FS)	WWAG	Not scheduled	2b	✖
Limerick	1900PUB1001	Abbeyfeale PWS	Abbeyfeale WW Network	WWBG	post 2029	2a	
Limerick	D0312-01	Adare	Adare Wastewater Treatment Plant	WWAG	2029	2a	
Limerick	D0312-01	Adare	Adare Ww Network Upgrade	WWBG	post 2029	2a	
Limerick	D0315-01	Askeaton	Askeaton WWTP Upgrade (STVGP)	WWAG	post 2029	2a	
Limerick	D0315-01	Askeaton	Askeaton	WWBG	Not scheduled	2b	✖
Limerick	D0507-01	Ballingarry	Ballingarry	WWAG	Not scheduled	2b	✖
Limerick	D0019-01	Castletroy	Castletroy Wastewater Treatment Plant	WWAG	2027	1	
Limerick	D0307-01	Croom	Croom WWTP	WWAG	2023	1	
Limerick	D0316-01	Dromcollagher Town and Environs	Dromcollagher Wastewater Treatment Plant and Network	WWAG	post 2029	2a	✖
Limerick	D0502-01	Foynes	Foynes Wastewater Treatment Plant	WWAG	2028	2a	
Limerick	A0208-01	Galbally	Galbally WWTP	WWAG	2026	1	
Limerick	D0504-01	Glin	Glin Wastewater Treatment Plant	WWAG	2028	2a	
Limerick	D0314-01	Hospital Town and Environs	Hospital WWTP Upgrade (STVGP)	WWAG	post 2029	2a	✖
Limerick	D0305-01	Kilfinnane	Kilfinnane - Kilfinnane Housing 1 Ps (Kilfinnane)	WWBG	2028	2a	
Limerick	D0106-01	Kilmallock	Kilmallock - Cois Abhainn Wwps	WWBG	2028	2a	
Limerick	D0013-01	Limerick	Limerick Wastewater Treatment Plant	WWAG	post 2029	2a	
Limerick	D0013-01	Limerick	LIHAF/MUHDS Growth Programme (Wastewater) - Mungret, Limerick	WWBG	2026	1	
Limerick	D0013-01	Limerick	Limerick Wastewater Network	WWBG	post 2029	2a	
Limerick	D0013-01	Limerick	Limerick City - Ballysimon Rd WWPS	WWBG	post 2029	2a	
Limerick	D0306-01	Murroe	Murroe WWTP	WWAG	2024	1	
Limerick	D0108-01	Newcastle West	Newcastle West Wastewater Treatment Plant	WWAG	2029	2a	
Limerick	D0503-01	Pallasgreen	Pallasgreen WWTP	WWAG	2023	1	
Limerick	A0219-01	Shanagolden	Shanagolden	WWAG	Not scheduled	2b	✖
Longford	D0229	Ballyleague Wastewater Treatment Works	Longford Rd Wwps - Lanesborough (Ballyleague)	WWBG	2028	2a	

County	Agglomeration Code	Agglomeration Name	Treatment Plant or Project name	Portfolio	Estimated Completion Year	RBMP List Category	When delivered is a project likely to help address a UWW significant pressure?
Longford	D0096-01	Ballymahon	Ballymahon Wastewater Treatment Plant	WWAG	2029	2a	
Longford	A0565-01	Cullyfad - Woodlands Park	Cullyfad WWTP Upgrade (STVGP)	WWAG	2027	1	
Longford	D0098-01	Edgeworthstown	Edgeworthstown Wastewater Treatment Plant	WWAG	post 2029	2a	✖
Longford	A0564-01	Enybegs - Crannlur	Enybegs-Crannlur WWTP Upgrade (STVGP) (OR/FS)	WWAG	Not scheduled	2b	
Longford	D0187-01	Granard	Granard WWTP Upgrade (NRRP-SM2) (OR/FS)	WWAG	Not scheduled	2b	✖
Longford	D0060-01	Longford	Battery Court Wwps - Longford	WWBG	2028	2a	
Longford	D0060-01	Longford	Longford - Lisbrack Ps (Longford)	WWBG	2028	2a	
Longford	D0060-01	Longford	Longford - Little Water Street Ps (Longford)	WWBG	2028	2a	
Longford	D0060-01	Longford	Longford WWTP Upgrade (LTCGP) (OR/FS)	WWAG	Not scheduled	2b	✖
Louth	D0117-01	Ardee	Ardee WWTP Upgrade (LTCGP) (OR/FS)	WWAG	Not scheduled	2b	
Louth	D0117-01	Ardee	Ardee WWTP partial upgrade (P removal)	WWAG	2024	1	
Louth	D0117-01	Ardfert	Ardfert	WWAG	Not scheduled	2b	✖
Louth	D0188-01	Blackrock	Wastewater Network Upgrade - Cocklehill (Local Network Reinforcement)	WWBG	2024	1	
Louth	D0188-01	Blackrock	Blackrock	WWAG	Not scheduled	2b	
Louth	D0269-01	Castlebellingham	Castlebellingham WWTP	WWAG	2024	1	
Louth	D0265-01	Clogherhead	Clogherhead Wastewater Treatment Plant	WWAG	2029	2a	
Louth	D0261-01	Collon	Collon WWTP Upgrade (STVGP) (OR/FS)	WWAG	Not scheduled	2b	
Louth	D0041-01	Drogheda	Wastewater Network (Upgrade) - Drogheda, Louth	WWBG	2026	1	✖
Louth	D0041-01	Drogheda	Drogheda WWTP CM	WWAG	2029	2a	
Louth	D0041-01	Drogheda	Wastewater Network Upgrade - Greenhills, Louth (Local Network Reinforcement)	WWBG	2024	1	✖
Louth	D0041-01	Drogheda	Wastewater Network (New) - South Drogheda	WWBG	2026	1	✖
Louth	D0041-01	Drogheda	Drogheda WWTP Upgrade (LTCGP) (OR/FS)	WWAG	Not scheduled	2b	✖
Louth	D0053-01	Dundalk	LIHAF/MUHDS Growth Programme (Wastewater) - Mount Avenue, Dundalk	WWBG	2025	1	

County	Agglomeration Code	Agglomeration Name	Treatment Plant or Project name	Portfolio	Estimated Completion Year	RBMP List Category	When delivered is a project likely to help address a UWW significant pressure?
Louth	D0053-01	Dundalk	St. Helena's Pumping Station and Rising Main - Assessment & Replacement	WWBG	2027	1	
Louth	D0053-01	Dundalk	Dundalk East Wastewater Network	WWBG	2028	2a	
Louth	D0053-01	Dundalk	Dundalk WWTP CM	WWAG	2029	2a	
Louth	D0053-01	Dundalk	Dundalk Ww Network	WWBG	post 2029	2a	✖
Louth	D0053-01	Dundalk	Dundak/Blackrock WWTP Upgrade	WWAG	post 2029	2a	✖
Louth	D0053-01	Dundalk	Dundalk/Blackrock WWTP Strategic Drainage Study (OR/FS)	WWAG	Not scheduled	2b	✖
Louth	D0111-01	Dunleer	Dunleer WWTP Upgrade (NRRP-SM2) (OR/FS)	WWAG	Not scheduled	2b	✖
Louth	A0072-01	Omeath Sewerage Scheme	Omeath Sewerage Scheme - Wastewater Outfall	WWAG	2024	1	
Louth	multiple	Omeath	INTERREG VA SWELL Project	WWAG	2024	1	
Louth	D0270-01	Tallanstown	Tallanstown	WWBG	Not scheduled	2b	
Louth	A0147-01	Tinure Sewerage Scheme	Tinure WWTP Upgrade (STVGP)	WWAG	Not scheduled	2b	
Mayo	D0216-01	Balla	Balla WWTP Upgrade (NRRP-SM2) (OR/FS)	WWAG	Not scheduled	2b	✖
Mayo	D0355-01	Ballindine	Ballindine Ww Network (I/I Reduction)	WWBG	2025	1	✖
Mayo	D0355-01	Ballindine	Ballindine WWTP Upgrade (NRRP-SM2) (OR/FS)	WWAG	Not scheduled	2b	
Mayo	D0069-01	Ballyhaunis	Ballyhaunis WWTP Upgrade (OR/FS)	WWAG	Not scheduled	2b	✖
Mayo	D0074-01	Belmullet	Wastewater Network (Upgrade) - Belmullet, Mayo	WWBG	2029	2a	
Mayo	A0557-01	Bohola	Bohola	WWAG	Not scheduled	2b	✖
Mayo	D0071-01	Claremorris	Claremorris Wastewater Treatment Plant	WWAG	2028	2a	
Mayo	D0071-01	Claremorris	Claremorris WW Network Upgrade	WWBG	post 2029	2a	
Mayo	D0367-01	Doogort	Doogort WWTP Upgrade (STVGP)	WWAG	post 2029	2a	
Mayo	A0011-01	Hollymount	Hollymount WWTP Upgrade (STVGP) (OR/FS)	WWAG	Not scheduled	2b	
Mayo	D0357-01	Kilkelly	Kilkelly WWTP Upgrade (NRRP-SM2) (OR/FS)	WWAG	Not scheduled	2b	✖
Mayo	D0217-01	Kiltimagh	Kiltimagh WW Network Upgrade	WWBG	2028	2a	
Mayo	D0217-01	Kiltimagh	Kiltimagh - Ps3 Kilkelly Road	WWBG	2028	2a	

County	Agglomeration Code	Agglomeration Name	Treatment Plant or Project name	Portfolio	Estimated Completion Year	RBMP List Category	When delivered is a project likely to help address a UWW significant pressure?
Mayo	D0220-01	Louisburgh	Louisbourgh WWTP Upgrade (STVGP) (OR/FS)	WWAG	Not scheduled	2b	
Mayo	D0224-01	Newport	Newport Wastewater Treatment Plant	WWAG	post 2029	2a	
Mayo	D0055-01	Westport	Westport	WWAG	Not scheduled	2b	
Meath	D0488-01	Carlanstown	Carlanstown WWTP	WWAG	2023	1	
Meath	D0488-01	Carlanstown	Carlanstown WWTP Upgrade (STVGP) (OR/FS)	WWAG	Not scheduled	2b	
Meath	D0133-01	Duleek	Duleek	WWAG	Not scheduled	2b	✖
Meath	D0131-01	Enfield	Enfield Wastewater Treatment Plant	WWAG	2025	1	
Meath	D0127-01	Kells	Kells Sewerage Scheme	WWBG	2028	2a	
Meath	D0127-01	Kells	Kells WWTP Upgrade (LTCGP) (OR/FS)	WWAG	Not scheduled	2b	
Meath	D0479-01	Kentstown	Kentstown WWTP Upgrade (STVGP) (OR/FS)	WWAG	Not scheduled	2b	✖
Meath	D0250-01	Longwood	Longwood WWTP Upgrade (STVGP)	WWAG	2027	1	
Meath	multiple	multiple	Meath Grouped Towns and Villages Sewerage Scheme - Contract 2	WWBG	2024	1	
Meath	D0059-01	Navan	LIHAF/MUHDS Growth Programme (Wastewater) - Farganstown, Navan	WWBG	2026	1	
Meath	D0059-01	Navan	Navan Wastewater Network	WWBG	2028	2a	
Meath	D0059-01	Navan	Navan WWTP Upgade	WWAG	2027	1	
Meath	D0059-01	Navan	Navan - Ros Na Ri Ps (Navan)	WWBG	2028	2a	
Meath	D0059-01	Navan	Andy Brennan WWPS Upgrade	WWBG	2028	2a	
Meath	D0059-01	Navan	Clonmaggaden Road – Navan Network Extension	WWBG	post 2029	2a	
Meath	D0487-01	Nobber	Nobber	WWAG	Not scheduled	2b	✖
Meath	D0034-01	Ringsend	Ashbourne WW PS Upgrade	WWBG	2023	1	
Meath	D0034-01	Ringsend	Ringsend - Foxbrook (Curragha Road) Ps, Ratoath (Ringsend)	WWBG	2028	2a	
Meath	D0034-01	Ringsend	Ringsend - Kilbride Ps, Kilbride (Ringsend)	WWBG	2028	2a	
Meath	D0034-01	Ringsend	Ringsend - Castle Street Ps, Ashbourne (Ringsend)	WWBG	2023	1	
Meath	D0034-01	Ringsend	Ratoath Main PS	WWBG	2029		✖

County	Agglomeration Code	Agglomeration Name	Treatment Plant or Project name	Portfolio	Estimated Completion Year	RBMP List Category	When delivered is a project likely to help address a UWW significant pressure?
Meath	D0257-01	Slane	Slane WWTP	WWAG	2024	1	
Meath	D0262-01	Stamullen	Stamullen Wastewater Treatment Plant	WWAG	2025	1	✖
Meath	D0137-01	Trim	Trim WWTP Upgrade (LTCGP) (OR/FS)	WWAG	Not scheduled	2b	
Monaghan	D0207-01	Ballybay and Environs	Ballybay WWTP upgrade (OR/FS)	WWAG	Not scheduled	2b	✖
Monaghan	D0062-01	Carrickmacross	Carrickmacross Wastewater Treatment Plant	WWAG	2024	1	✖
Monaghan	D0062-01	Carrickmacross	Carrickmacross - Cloughvalley Ps (Carrickmacross)	WWBG	2028	2a	
Monaghan	D0062-01	Carrickmacross	Carrickmacross WWTP Upgrade - Phase 2	WWAG	2026	1	
Monaghan	D0205-01	Castleblayney	Castleblayney - Monaghan Road Ps (Castleblayney)	WWBG	2028	2a	
Monaghan	D0205-01	Castleblayney	Castleblayney WWTP Upgrade (OR/FS)	WWAG	Not scheduled	2b	✖
Monaghan	D0206-01	Clones and Environs	Clones WWTP upgrade	WWAG	Not scheduled	2b	✖
Monaghan	A0031-01	Clontibret	Clontibret WWTP Upgrade (STVGP) (OR/FS)	WWAG	Not scheduled	2b	
Monaghan	D0346-01	Emyvale	Emyvale	WWAG	Not scheduled	2b	
Monaghan	D0347-01	Glaslough	Glaslough WWTP Upgrade (STVGP) (OR/FS)	WWAG	Not scheduled	2b	✖
Monaghan	D0061-01	Monaghan	Monaghan Town Wastewater Network Upgrade	WWBG	post 2029	2a	✖
Monaghan	D0061-01	Monaghan	Monaghan	WWAG	Not scheduled	2b	✖
Monaghan	D0458-01	Newbliss	Newbliss WWTP Upgrade (STVGP)	WWAG	Not scheduled	2b	
Monaghan	A0033-01	Oram	Oram WWTP Upgrade (STVGP)	WWAG	Not scheduled	2b	
Offaly	D0141-01	Banagher	Marina PS Upgrade - Banagher	WWBG	post 2029	2a	
Offaly	A0165-01	Belmont	Belmont - Belmont Ps (Belmont)	WWBG	2028	2a	
Offaly	D0109-01	Birr	Birr - School Street Ps (Birr)	WWBG	2028	2a	✖
Offaly	D0109-01	Birr	Birr	WWBG	Not scheduled	2b	✖
Offaly	A0167-01	Cloneygowan	Cloneygowan WWTP	WWAG	2025	1	✖
Offaly	A0166-01	Coolderry	Coolderry	WWAG	Not scheduled	2b	✖
Offaly	D0226-01	Daingean	Daingean WWTP	WWAG	2023	1	✖
Offaly	D0226-01	Daingean	Daingean WWTP Upgrade (STVGP) (OR/FS)	WWAG	Not scheduled	2b	✖

County	Agglomeration Code	Agglomeration Name	Treatment Plant or Project name	Portfolio	Estimated Completion Year	RBMP List Category	When delivered is a project likely to help address a UWW significant pressure?
Offaly	D0110-01	Edenderry	Edenderry Wastewater Treatment Plant	WWAG	2029	2a	
Offaly	D0110-01	Edenderry	Derrycoris WWPS Rising Main Replacement	WWBG	post 2029	2a	
Offaly	D0225-01	Kilcormac	Kilcormac WWTP Upgrade (NRRP-SM2) (OR/FS)	WWAG	Not scheduled	2b	✖
Offaly	D0227-01	Rhode	Rhode WWTP Upgrade (STVGP)	WWAG	2028	2a	
Offaly	D0039-01	Tullamore	Tullamore Whitehall (Network And Rm)	WWBG	2029	2a	
Offaly	D0039-01	Tullamore	Tullamore Wastewater Network - Siphons And Core Network Upgrade	WWBG	2029	2a	
Offaly	A0175-01	Walsh Island WWTP	Walsh Island WWTP Upgrade (STVGP) (OR/FS)	WWAG	Not scheduled	2b	
Roscommon	D0123-01	Ballaghaderreen Wastewater Treatment Works	Ballaghaderreen Wastewater Treatment Plant	WWAG	2026	1	
Roscommon	D0123-01	Ballaghkeen and Environs	Ballaghkeen and Environs	WWAG	Not scheduled	2b	✖
Roscommon	A0286-01	Ballinameen and Environs Wastewater Treatment Works	Ballinameen WWTP Upgrade (STVGP)	WWAG	2028	2a	
Roscommon	A0290-01	Ballintober and Environs Wastewater Treatment Works	Ballintober WWTP Upgrade (STVGP) (OR/FS)	WWAG	Not scheduled	2b	
Roscommon	A0282-01	Ballyfarnon and Environs Wastewater Treatment Works	Ballyfarnon-Feorish Bridge Ps (Sw2)	WWBG	2028	2a	
Roscommon	A0277-01	Lecarrow and Environs	Lecarrow WWTP Upgrade (STVGP)	WWAG	2025	1	
Roscommon	D0042-01	Monksland	Monksland WWTP Upgrade (OR/FS)	WWAG	Not scheduled	2b	✖
Roscommon	D0116-01	Roscommon Town & Environs	Roscommon Town Sewerage Scheme	WWBG	2024	1	✖
Roscommon	D0116-01	Roscommon Town & Environs	Ballinagard Rising Main Replacement	WWBG	post 2029	2a	
Roscommon	D0116-01	Roscommon Town & Environs	Roscommon WWTP Upgrade (LTCGP) (OR/FS)	WWAG	Not scheduled	2b	

County	Agglomeration Code	Agglomeration Name	Treatment Plant or Project name	Portfolio	Estimated Completion Year	RBMP List Category	When delivered is a project likely to help address a UWW significant pressure?
Roscommon	D0524-01	Termonbarry and Environs	Termonbarry WWTP	WWAG	2023	1	
Sligo	D0094-01	Ballymote	Ballymote - Ballybrennan Ps	WWBG	2023	1	
Sligo	D0095-01	Ballysadare	Ballysadare	WWAG	Not scheduled	2b	✖
Sligo	A0305-01	Bunnanaddan & Environs	Bunnanaddan & Environs	WWAG	Not scheduled	2b	✖
Sligo	A0545-01	Carney	Carney	WWAG	Not scheduled	2b	
Sligo	A0348-01	Castlebaldwin and Environs	Castlebaldwin and Environs WWTP Upgrade (STVGP) (OR/FS)	WWAG	Not scheduled	2b	
Sligo	D0394-01	Cliffony	Cliffony WWTP Upgrade (STVGP)	WWAG	post 2029	2a	✖
Sligo	D0093-01	Collooney	Collooney - Knockbeg Ps, Collooney	WWBG	2028	2a	✖
Sligo	A0312-01	Drumcliff	Drumcliff	WWAG	Not scheduled	2b	
Sligo	D0373-01	Easky	Easky WWTP Upgade	WWAG	2025	1	
Sligo	A0546-01	Gurteen	Riverstown - Riverstown Sewage Ps (Riverstown)	WWBG	2028	2a	
Sligo	D0239-01	Mullaghmore	Mullaghmore WWTP Upgrade (STVGP)	WWAG	post 2029	2a	
Sligo	D0249-01	Rosses Point	Sligo and Environs Sewerage Scheme - Network (Rosses Point)	WWBG	2024	1	
South Dublin	D0331-01	Milltown	Wastewater Network (New) - Milltown	WWBG	2026	1	
South Dublin	D0034-01	Ringsend	Local Network Reinforcement Project - Ballycullen and Scholarstown Wastewater Network Upgrade	WWBG	2023	1	
South Dublin	D0034-01	Ringsend	Network Extensions (Wastewater) - Clonburris	WWBG	2024	1	
South Dublin	D0034-01	Ringsend	LIHAF/MUHDS Growth Programme (Wastewater) - Celbridge Link Road, Dublin	WWBG	2022	1	
South Dublin	D0034-01	Ringsend	Public Works Service Agreement - Tay Lane Pumping Station	WWBG	2026	1	
South Dublin	D0034-01	Ringsend	9B Sewer Reinforcement	WWBG	post 2029	2a	
South Dublin	D0034-01	Ringsend	Dodder Valley Sewer Reinforcement	WWBG	post 2029	2a	

County	Agglomeration Code	Agglomeration Name	Treatment Plant or Project name	Portfolio	Estimated Completion Year	RBMP List Category	When delivered is a project likely to help address a UWW significant pressure?
South Dublin	D0034-01	Ringsend	Wastewater Network Upgrade - Tobbermaclugg Pumping Station Upgrade (Local Network Reinforcement)	WWBG	2024	1	
South Dublin	D0034-01	Ringsend	Cookstown Ww Network Upgrade	WWBG	2029	2a	
South Dublin	D0034-01	Ringsend	Wastewater Network (Upgrade) - Sandyford	WWBG	2027	1	
South Dublin	D0034-01	Ringsend	Newcastle Main (Aylmer) Ps Cm Works	WWBG	2029	2a	
South Dublin	D0038-01	Shanganagh-Bray	Rathmichael/Ballybride Wastewater Network	WWBG	2029	2a	
Tipperary	D0189-01	Ballina	Ballina Wastewater Treatment Plant	WWAG	2025	1	✖
Tipperary	D0189-01	Ballina (Mayo)	Ballina (Mayo)	WWAG	Not scheduled	2b	✖
Tipperary	D0326-01	Borrisokane	Borrisokane WWTP Upgrade (NRRP-SM2) (OR/FS)	WWAG	Not scheduled	2b	✖
Tipperary	D0323-01	Borrisoleigh	Borrisoleigh	WWAG	Not scheduled	2b	✖
Tipperary	D0167-01	Cahir	Cahir Wastewater Treatment Plant	WWAG	2025	1	
Tipperary	D0440-01	Cappawhite	Cappawhite	WWAG	Not scheduled	2b	✖
Tipperary	D0440-01	Cappawhite	Cappawhite	WWBG	Not scheduled	2b	✖
Tipperary	D0171-01	Cashel	Cashel WWTP Upgrade (OR/FS)	WWAG	Not scheduled	2b	
Tipperary	D0475-01	Cloughjordan	Cloughjordan WWTP Upgrade (STVGP) (OR/FS)	WWAG	Not scheduled	2b	✖
Tipperary	A0412-01	Drangan	Drangan	WWAG	Not scheduled	2b	✖
Tipperary	A0186-01	Dromineer	Dromineer WWTP	WWAG	2025	1	
Tipperary	A0410-01	Dundrum	Dundrum - Off Main St. Ps (Dundrum)	WWBG	2028	2a	
Tipperary	D0164-01	Fethard	Fethard Wastewater Treatment Plant	WWAG	2026	1	
Tipperary	A0416-01	Grangemockler	Grangemockler WWTP	WWAG	2026	1	✖
Tipperary	D0452-01	Kilsheelan	Kilsheelan WWTP Upgrade (STVGP)	WWAG	Not scheduled	2b	
Tipperary	D0457-01	Limerick Junction	Limerick Junction Wastewater Treatment Plant	WWAG	2024	1	
Tipperary	A0419-01	Lisvarrinane	Lisvarrinane WWTP Upgrade (STVGP)	WWAG	Not scheduled	2b	
Tipperary	D0456-01	Mullinahone	Mullinahone WWTP Upgrade (NRRP-SM2) (OR/FS)	WWAG	Not scheduled	2b	✖
Tipperary	D0027-01	Nenagh	Nenagh New Wastewater Treatment Plant	WWAG	2029	2a	

County	Agglomeration Code	Agglomeration Name	Treatment Plant or Project name	Portfolio	Estimated Completion Year	RBMP List Category	When delivered is a project likely to help address a UWW significant pressure?
Tipperary	A0418-01	Newcastle	Newcastle (South Tipperary) - O Donnells Ps (Newcastle (South Tipperary))	WWBG	2028	2a	
Tipperary	D0325-01	Newport	Newport (Tipperary) Wastewater Treatment Plant	WWAG	2025	1	
Tipperary	D0325-01	Newport	Newport (North Tipperary) - Murroe Road Ps (Newport (North Tipperary))	WWBG	2028	2a	
Tipperary	A0195-01	Newtown	Newtown WWTP	WWAG	2023	1	
Tipperary	A0182-01	Portroe	Portroe WWTP	WWAG	2023	1	
Tipperary	A0200-01	Puckane	Puckane WWTP	WWAG	2023	1	
Tipperary	D0025-01	Roscrea	Roscrea Wastewater Network	WWBG	2028	2a	✖
Tipperary	D0025-01	Roscrea	Roscrea WWTP Upgrade (RBMP) (OR/FS)	WWAG	Not scheduled	2b	✖
Tipperary	D0190-01	Templemore	Templemore	WWAG	Not scheduled	2b	✖
Tipperary	D0026-01	Thurles	Thurles WW Network Upgrade	WWBG	2029	2a	✖
Tipperary	D0146-01	Tipperary Town	Tipperary Town WWTP Upgrade	WWAG	post 2029	2a	
Waterford	D0358-01	Baile Na nGall	Baile na nGall Pumping Stations and Rising Mains Upgrades	WWBG	2026	1	
Waterford	A0371-01	Ballyduff Upper	Ballyduff Upper WWTP Upgrade (STVGP) (OR/FS)	WWAG	Not scheduled	2b	
Waterford	A0374-01	Bonmahon	Bonmahon WWTP Upgrade (STVGP) (OR/FS)	WWAG	Not scheduled	2b	
Waterford	A0377-01	Clonea Power	Clonea Power WWTP	WWAG	2026	1	✖
Waterford	D0017-01	Dungarvan	Dungarvan Ww Network Upgrades	WWBG	post 2029	2b	✖
Waterford	A0380-01	Kill	Kill WWTP Upgrade (RBMP) (OR/FS)	WWAG	Not scheduled	2b	✖
Waterford	D0275-01	Kilmacthomas	Kilmacthomas	WWAG	Not scheduled	2b	✖
Waterford	A0382-01	Lemybrien	Lemybrien WWTP Upgrade (STVGP)	WWAG	post 2029	2a	
Waterford	D0176-01	Lismore	Lismore WW Network Upgrade	WWBG	2028	2a	
Waterford	D0015-01	Tramore	Wastewater Network Upgrade - Tramore (Local Network Reinforcement)	WWBG	2024	1	
Waterford	D0022-01	Waterford City	LIHAF/MUHDS Growth Programme (Wastewater) - Gracedieu, Waterford	WWBG	2022	1	

County	Agglomeration Code	Agglomeration Name	Treatment Plant or Project name	Portfolio	Estimated Completion Year	RBMP List Category	When delivered is a project likely to help address a UWW significant pressure?
Waterford	D0022-01	Waterford city	Waterford City Wastewater Treatment Plant (to G2)	WWAG	post 2029	2a	
Waterford	D0022-01	Waterford City	Waterford City Wastewater Network (Upgrade) - North Quays	WWBG	2024	1	
Waterford	D0022-01	Waterford City	Waterford City - Island View WW Network Upgrade	WWBG	post 2029	2a	
Waterford	D0022-01	Waterford City	Waterford City Ww Network Upgrade	WWBG	post 2029	2a	
Westmeath	D0007-01	Athlone	Athlone Main Drainage - Wastewater Treatment Plant Upgrade	WWBG	2025	1	
Westmeath	D0007-01	Athlone	Athlone Main Drainage - I&I Reduction	WWBG	2024	1	
Westmeath	D0007-01	Athlone	Athlone - Roscommon Road Ps (Athlone)	WWBG	2028	2a	
Westmeath	D0509-01	Ballymore	Ballymore WWTP Upgrade (STVGP)	WWAG	post 2029	2a	✖
Westmeath	D0485-01	Collinstown	Collinstown WWTP Upgrade (STVGP) (OR/FS)	WWAG	Not scheduled	2b	✖
Westmeath	D0267-01	Delvin	Delvin WWTP Upgrade (STVGP) (OR/FS)	WWAG	Not scheduled	2b	
Westmeath	A0527-01	Millview Housing Estate (Milltownpass)	Millview H.E. (Milltownpass) WWTP	WWAG	2026	1	✖
Westmeath	D0097-01	Moate	Moate	WWAG	Not scheduled	2b	✖
Westmeath	D0510-01	Multyfarnham village and environs	Multyfarnham WWTP Upgrade (OR/FS)	WWAG	Not scheduled	2b	
Westmeath	D0101-01	Rochfortbridge	Rochfortbridge	WWAG	Not scheduled	2b	✖
Wexford	A0243-01	Arthurstown and Environs	Arthurstown, Ballyhack and Duncannon Wastewater Treatment Plants	WWAG	2023	1	
Wexford	A0243-01	Arthurstown and Environs	Arthurstown And Environs - Kings Bay Ps (Arthurstown And Environs)	WWBG	2028	2a	
Wexford	D0402-01	Ballycanew and Environs	Ballycanew WWTP Upgrade (NRRP-SM2) (OR/FS)	WWAG	Not scheduled	2b	✖
Wexford	A0256-01	Ballyhoge and Environs	Ballyhoge and Environs	WWAG	Not scheduled	2b	
Wexford	D0407-01	Ballymurn and Environs	Ballymurn and Environs	WWAG	Not scheduled	2b	✖
Wexford	D0046-01	Courtown-Gorey	Gorey PS Upgrade	WWBG	2025	1	✖

County	Agglomeration Code	Agglomeration Name	Treatment Plant or Project name	Portfolio	Estimated Completion Year	RBMP List Category	When delivered is a project likely to help address a UWW significant pressure?
Wexford	D0046-01	Courtown-Gorey	Courtown-Gorey	WWBG	Not scheduled	2b	✖
Wexford	D0029-01	Enniscorthy	Enniscorthy Main Drainage	WWBG	2024	1	
Wexford	D0029-01	Enniscorthy	Enniscorthy WW Network - Island View WWPS	WWBG	post 2029	2a	
Wexford	D0169-01	Ferns and Environs	Ferns WWTP Upgrade (OR/FS)	WWAG	Not scheduled	2b	✖
Wexford	D0232-01	Kilmore Quay Village and Environs	Kilmore Quay Village and Environs Waste Water Outfall	WWAG	2023	1	
Wexford	D0173-01	Rosslare Strand and Environs	Rosslare Strand And Environs - Southfields Ps (Rosslare Strand And Environs)	WWBG	2028	2a	
Wexford	D0173-01	Rosslare Strand and Environs	Kapunda Rising Main Replacement	WWBG	post 2029	2a	
Wexford	D0173-01	Rosslare Strand and Environs	Rosslare Strand WWTP Upgrade (LTCGP) (OR/FS)	WWAG	Not scheduled	2b	
Wexford	D0397-01	Tagoat and Environs	Tagoat WWTP Upgrade (STVGP)	WWAG	Not scheduled	2b	
Wexford	A0245-01	Wellingtonbridge and Environs	Wellingtonbridge WWTP Upgrade (STVGP)	WWAG	Not scheduled	2b	
Wexford	D0030-01	Wexford Town	Wexford Town Distillary Road Pumping Station Upgrade - Wastewater Network	WWBG	2026	1	
Wexford	D0030-01	Wexford Town	Wexford Town Ww Network Upgrade	WWBG	post 2029	2a	
Wexford	D0030-01	Wexford Town	Wexford Town - Whitemill WW Network Upgrade	WWBG	post 2029	2a	
Wexford	D0030-01	Wexford town	Wexford town	WWAG	Not scheduled	2b	✖
Wicklow	D0006-02	Arklow and Environs	Arklow Sewerage Scheme - Wastewater Treatment Plant	WWAG	2025	1	
Wicklow	D0006-02	Arklow and Environs	Public Works Service Agreement - Arklow Wastewater Network Upgrade	WWBG	2023	1	
Wicklow	D0222-01	Aughrim	Aughrim WWTP Upgrade (STVGP)	WWAG	2027	1	
Wicklow	D0411-01	Avoca	Avoca Wastewater Treatment Plant	WWAG	2025	1	
Wicklow	D0063-01	Blessington	Blessington Wastewater Treatment Plant	WWAG	2023	1	✖
Wicklow	A0008-01	Conary	Conary	WWAG	Not scheduled	2b	
Wicklow	D0010-01	Greystones	Greystones - Rathdown WWPS Upgrade	WWBG	2025	1	

County	Agglomeration Code	Agglomeration Name	Treatment Plant or Project name	Portfolio	Estimated Completion Year	RBMP List Category	When delivered is a project likely to help address a UWW significant pressure?
Wicklow	D0010-01	Greystones	Newtown Mount Kennedy Urban Regeneration	WWBG	post 2029	2a	
Wicklow	D0087-01	Kilcoole	Kilcoole NTMK Wastewater	WWBG	2023	1	
Wicklow	D0087-01	Kilcoole	Kilcoole WWTP Upgrade (NRRP-SM2) (OR/FS)	WWAG	Not scheduled	2b	✖
Wicklow	D0416-01	Kilpedder	Kilpedder - Fowlers Garage, Kilpedder Ps (Kilpedder)	WWBG	2028	2a	
Wicklow	D0416-01	Kilpedder	Kilpedder WWTP Upgrade (NRRP-SM2) (OR/FS)	WWAG	Not scheduled	2b	✖
Wicklow	D0415-01	Laragh	Laragh WWTP Upgrade (STVGP) (OR/FS)	WWAG	Not scheduled	2b	
Wicklow	D0410-01	Newcastle	Public Works Service Agreement - Newcastle Wastewater Network Upgrade	WWBG	2023	1	
Wicklow	D0410-01	Newcastle	Newcastle	WWAG	Not scheduled	2b	✖
Wicklow	D0414-01	Redcross	Redcross WWTP Upgrade	WWAG	post 2029	2a	
Wicklow	D0221-01	Tinahely	Tinahely WWTP Upgrade (STVGP)	WWAG	Not scheduled	2b	
Wicklow	D0012-01	Wicklow	Wicklow - Woodside, Rathnew Ps (Wicklow)	WWBG	2028	2a	

Notes:

RBMP list categories

1 Projects with estimated delivery date by end 2027

2a Projects progressing and expected to complete post 2027

2b Agglomerations under assessment currently or where assessments will be undertaken during the third cycle, with decisions on projects to be taken subsequent to completing the necessary assessments.

Notes regarding estimated completion years:

- Projects included in Lists 1 and 2a with completion years after 2024 are subject to change through the CRU approval of Uisce Éireann's Investment Plan 2025 to 2029 as part of the regulatory process. The current approved Investment Plan, RC3, runs from 2020 to 2024.
- Completion of projects within the timeframes included in Lists 1 and 2a is subject to multi-annual funding as set out in Uisce Éireann's Strategic Funding Plan and the National Development Plan funding envelope.
- Uisce Éireann prioritises and balances its investment portfolio to optimise the delivery of committed outputs and outcomes however it is subject to change drivers within and outside of our control e.g. Covid-19, hyper-inflation and the energy crisis.
- Completion years for projects in Lists 1 and 2a, particularly for those with later completions, are subject to delay risk associated with statutory approvals, land acquisition and factors such as scale and complexity of projects and finalising of design solutions.
- Completion years for List 2b projects refer to estimated completion of the required assessments with decisions on projects to be taken subsequent to completing the necessary assessments.

Portfolio explanations:

WWAG Wastewater Above Ground (Wastewater treatment and can include networks as part of the project)

WWBG Wastewater Below Ground (Wastewater collection networks and associated infrastructure including pumping stations)

When delivered is a project likely to help address a UWW significant pressure?

Significant pressures were ticked 'x' if the project has potential to address the significant pressure on a specific water body as listed in the EPA UWW significant pressures dataset Oct 2023. The assumption is that meeting WWDA requirements will address the significant pressure. In a small number of cases where significant upgrades have been carried out or projects progressing, (while not fully meeting WWDA requirements) a judgement was made that these works would be likely to address the significant pressure.

www.gov.ie/RBMP

Department of Housing,
Local Government and Heritage



Rialtas na hÉireann
Government of Ireland

Rialtas na hÉireann
Government of Ireland

Water Action Plan 2024

A River Basin Management Plan for Ireland

Appendix 7: List of 197 water bodies - Urban Wastewater

Prepared by the Department of Housing, Local Government and Heritage

www.gov.ie/RBMP

Waterbody Name	Pressure Subcategory	Agglomeration Name	Licence Code	Project or study title associated with the Pressure	Status of Pressure	Status of combined pressures on water body	Estimated Timeline
BRICK_020	Agglomeration PE of 500 to 1,000	Abbeydorney	D0417-01	Options report/ Feasibility study	under assessment	under assessment	2024-2027
AHASCRAGH_030	Agglomeration PE < 500	Ahascragh	A0548-01	Ahascragh Wastewater Treatment Plant	project progressing	project progressing	by 2027
TYSHE_020	Agglomeration PE of 1,001 to 2,000	Ardfert	D0282-01	Options report/ Feasibility study	to be assessed	to be assessed	2024-2027
DEEL (NEWCASTLEWEST)_140	Combined Sewer Overflows	Askeaton	D0315-01	Askeaton	to be assessed	to be assessed	2024-2027
CLARINBRIDGE_030	Agglomeration PE of 2,001 to 10,000	Athenry	D0193-01	Options report/ Feasibility study	under assessment	under assessment	2024-2027
CLARINBRIDGE_040	Agglomeration PE of 2,001 to 10,000	Athenry	D0193-01	Options report/ Feasibility study	under assessment	under assessment	2024-2027
BLACKWATER (KELLS)_020	Agglomeration PE of 2,001 to 10,000	Bailieborough	D0085-01	Bailieborough Wastewater Treatment Plant	project progressing	project progressing	by 2027
LOUGHNAMINOO STREAM_010	Agglomeration PE of 1,001 to 2,000	Balla	D0216-01	Options report/ Feasibility study	under assessment	under assessment	2024-2027
SOW_010	Agglomeration PE of 500 to 1,000	Ballaghkeen and Environs	D0398-01	Ballaghkeen and Environs	to be assessed	defer	2024-2027
GRANGE (TIPPERARY)_010	Agglomeration PE > 10,000	Ballina	D0189-01	Ballina Wastewater Treatment Plant	project progressing	project progressing	by 2027
Moy Estuary	Agglomeration PE > 10,000	Ballina (Mayo)	D0016-01	Options report/ Feasibility study	to be assessed	to be assessed	2024-2027
BALLINDINE_010	Agglomeration PE of 500 to 1,000	Ballindine	D0355-01	Options report/ Feasibility study	under assessment	under assessment	2024-2027
BALLINDINE_010	Combined Sewer Overflows	Ballindine	D0355-01	Ballindine Ww Network (I/I Reduction)	project progressing	defer	by 2027
CLONSHIRE_010	Agglomeration PE of 500 to 1,000	Ballingarry	D0507-01	Options report/ Feasibility study	to be assessed	to be assessed	2024-2027
Allua	Agglomeration PE of 500 to 1,000	Ballingeary	D0431-01	Options report/ Feasibility study	under assessment	under assessment	2024-2027
BLACK (BORRIS)_020	Agglomeration PE < 500	Ballinkillen	A0094-01	Options report/ Feasibility study	to be assessed	to be assessed	2024-2027
GREESE_030	Agglomeration PE < 500	Ballitore	A0129-01	Options report/ Feasibility study	under assessment	under assessment	2024-2027

Waterbody Name	Pressure Subcategory	Agglomeration Name	Licence Code	Project or study title associated with the Pressure	Status of Pressure	Status of combined pressures on water body	Estimated Timeline
DROMORE_040	Agglomeration PE of 2,001 to 10,000	Ballybay and Environs	D0207-01	Options report/ Feasibility study	under assessment	under assessment	2024-2027
FINN (DONEGAL)_060	Combined Sewer Overflows	Ballybofey-Stranorlar	D0120-01	Ballybofey/Stranorlar Sewerage Scheme - Wastewater Network	project progressing	project progressing	by 2027
FINN (DONEGAL)_060	Agglomeration PE of 2,001 to 10,000	Ballybofey-Stranorlar	D0120-01	Ballybofey/Stranorlar WWTP	works complete	defer	complete
OWENAVORRAGH_050	Agglomeration PE of 500 to 1,000	Ballycanew and Environs	D0402-01	Options report/ Feasibility study	under assessment	under assessment	2024-2027
Cashen	Agglomeration PE of 500 to 1,000	Ballyduff	D0418-01	Options report/ Feasibility study	to be assessed	to be assessed	2024-2027
KNOPPOGE_SOUTH_010	Agglomeration PE of 500 to 1,000	Ballyduff	D0418-01	Options report/ Feasibility study	to be assessed	to be assessed	2024-2027
LITTLE ARRIGLE_010	Agglomeration PE of 500 to 1,000	Ballyhale-Knocktopher	D0530-01	Options report/ Feasibility study	to be assessed	to be assessed	2024-2027
DALGAN_010	Agglomeration PE of 2,001 to 10,000	Ballyhaunis	D0069-01	Options report/ Feasibility study	under assessment	under assessment	2024-2027
MOUNTNUGENT_020	Agglomeration PE of 2,001 to 10,000	Ballyjamesduff	D0256-01	Ballyjamesduff Wastewater Treatment Plant	project progressing	project progressing	by 2027
ISLAND_030	Agglomeration PE < 500	Ballymoe	A0105-01	Ballymoe WWTP	project progressing	project progressing	post 2029
DUNGOLMAN_030	Agglomeration PE of 500 to 1,000	Ballymore	D0509-01	Ballymore WWTP Upgrade (STVGP)	project progressing	project progressing	post 2029
SOW_010	Agglomeration PE of 500 to 1,000	Ballymurn and Environs	D0407-01	Options report/ Feasibility study	to be assessed	to be assessed	2024-2027
BALLYROAN_010	Agglomeration PE of 500 to 1,000	Ballyroan	D0385-01	Ballyroan WWTP Upgrade (STVGP)	project progressing	project progressing	post 2029
Ballysadare Estuary	Agglomeration PE of 2,001 to 10,000	Ballysadare	D0095-01	Options report/ Feasibility study	to be assessed	to be assessed	2024-2027
LITTLE BROSNA_050	Combined Sewer Overflows	Birr	D0109-01	Birr	to be assessed	to be assessed	2024-2027
ROCK (BIRR)_020	Combined Sewer Overflows	Birr	D0109-01	Birr	to be assessed	to be assessed	2024-2027

Waterbody Name	Pressure Subcategory	Agglomeration Name	Licence Code	Project or study title associated with the Pressure	Status of Pressure	Status of combined pressures on water body	Estimated Timeline
Lower Lough Macnean	Agglomeration PE of 500 to 1,000	Blacklion	D0498-01	Options report/ Feasibility study	under assessment	under assessment	2024-2027
SHOURNAGH_030	Agglomeration PE > 10,000	Blarney	D0043-01	Options report/ Feasibility study	to be assessed	to be assessed	2024-2027
Golden Falls	Agglomeration PE of 2,001 to 10,000	Blessington	D0063-01	Blessington Wastewater Treatment Plant	project progressing	project progressing	by 2027
CARROWARD_010	Agglomeration PE < 500	Bohola	A0557-01	Options report/ Feasibility study	to be assessed	to be assessed	2024-2027
BALLYFINBOY_050	Agglomeration PE of 1,001 to 2,000	Borrisokane	D0326-01	Options report/ Feasibility study	under assessment	under assessment	2024-2027
BORRISOLEIGH STREAM_010	Agglomeration PE of 1,001 to 2,000	Borrisoleigh	D0323-01	Options report/ Feasibility study	to be assessed	to be assessed	2024-2027
SKEOGE_010	Agglomeration PE of 500 to 1,000	Bridgend	D0532-01	Bridgend Wastewater Treatment Plant	project progressing	project progressing	post 2029
BUNNANADDAN STREAM_010	Agglomeration PE < 500	Bunnanaddan & Environs	A0305-01	Options report/ Feasibility study	to be assessed	to be assessed	2024-2027
BURNFOOT_020	Agglomeration PE of 500 to 1,000	Burnfoot	D0531-01	Burnfoot Wastewater Treatment Plant	project progressing	project progressing	post 2029
AWBEG (Buttevant)_020	Combined Sewer Overflows	Buttevant	D0303-01	Buttevant	to be assessed	to be assessed	2024-2027
CLYDA_010	Agglomeration PE of 500 to 1,000	Bweeng and Environs	D0438-01	Options report/ Feasibility study	to be assessed	to be assessed	2024-2027
CAPPAWHITE STREAM_010	Agglomeration PE of 500 to 1,000	Cappawhite	D0440-01	Cappawhite	to be assessed	defer	2024-2027
CAPPAWHITE STREAM_010	Combined Sewer Overflows	Cappawhite	D0440-01	Cappawhite	to be assessed	to be assessed	2024-2027
Naglack	Agglomeration PE > 10,000	Carrickmacross	D0062-01	Carrickmacross Wastewater Treatment Plant	project progressing	project progressing	by 2027
PROULES_020	Agglomeration PE > 10,000	Carrickmacross	D0062-01	Carrickmacross Wastewater Treatment Plant	project progressing	project progressing	by 2027
Lough Mahon (Harper's Island)	Agglomeration PE > 10,000	Carrigtwohill and Environs	D0044-01	Options report/ Feasibility study	to be assessed	to be assessed	2024-2027

Waterbody Name	Pressure Subcategory	Agglomeration Name	Licence Code	Project or study title associated with the Pressure	Status of Pressure	Status of combined pressures on water body	Estimated Timeline
Muckno	Agglomeration PE of 2,001 to 10,000	Castleblayney	D0205-01	Castleblayney WWTP Upgrade (OR/FS)	works complete	works complete	2024-2027
DININ (NORTH)_040	Agglomeration PE of 2,001 to 10,000	Castlecomer	D0149-01	Options report/ Feasibility study	under assessment	under assessment	2024-2027
WOMANAGH_020	Agglomeration PE of 2,001 to 10,000	Castlemartyr	D0134-01	Castlemartyr Wastewater Treatment Plant	project progressing	project progressing	by 2027
GREESE_060	Agglomeration PE < 500	Castleroe West	A0127-01	Options report/ Feasibility study	to be assessed	to be assessed	2024-2027
KILLARY WATER_010	Agglomeration PE < 500	Castletown	A0044-01	Castletown (Laois) Wastewater Treatment Plant	works complete	works complete	by 2027
CHARLEVILLE STREAM_020	Agglomeration PE of 2,001 to 10,000	Charleville and Environs	D0204-01	Options report/ Feasibility study	to be assessed	to be assessed	2024-2027
CARTONKILLERDOO_010	Agglomeration PE of 500 to 1,000	Cliffony	D0394-01	Options report/ Feasibility study	to be assessed	to be assessed	2024-2027
FINN (DONEGAL)_030	Agglomeration PE < 500	Cloghan/Brockagh	A0486-01	Options report/ Feasibility study	to be assessed	to be assessed	2024-2027
CLODIAGH (PORTLAW)_030	Agglomeration PE < 500	Clonea Power	A0377-01	Clonea Power WWTP	project progressing	project progressing	by 2027
FINN (MONAGHAN)_040	Agglomeration PE of 2,001 to 10,000	Clones and Environs	D0206-01	Options report/ Feasibility study	under assessment	under assessment	2024-2027
CUSHINA_020	Agglomeration PE < 500	Cloneygowan	A0167-01	Cloneygowan WWTP	project progressing	project progressing	by 2027
BALLYFINBOY_030	Agglomeration PE of 500 to 1,000	Cloughjordan	D0475-01	Options report/ Feasibility study	under assessment	under assessment	2024-2027
Cork Harbour	Agglomeration PE > 10,000	Cobh	D0054-01	Cobh	works complete	works complete	complete
SLATE_020	Agglomeration PE of 1,001 to 2,000	Coill Dubh	D0242-01	Options report/ Feasibility study	under assessment	under assessment	2024-2027
BALLOUGH STREAM_020	Agglomeration PE < 500	Colecot Cottages	A0107-01	Options report/ Feasibility study	under assessment	under assessment	2024-2027
YELLOW (CASTLEPOLLARD)_010	Agglomeration PE of 500 to 1,000	Collinstown	D0485-01	Options report/ Feasibility study	under assessment	under assessment	2024-2027
OWENMORE (SLIGO)_080	Agglomeration PE of 2,001 to 10,000	Collooney	D0093-01	Collooney	works complete	works complete	complete
DOUGLAS (LAOIS)_030	Agglomeration PE < 500	Coolanagh	A0136-01	Options report/ Feasibility study	to be assessed	to be assessed	2024-2027

Waterbody Name	Pressure Subcategory	Agglomeration Name	Licence Code	Project or study title associated with the Pressure	Status of Pressure	Status of combined pressures on water body	Estimated Timeline
ROCK (BIRR)_010	Agglomeration PE < 500	Coolderry	A0166-01	Options report/ Feasibility study	to be assessed	to be assessed	2024-2027
DROMORE_070	Agglomeration PE of 2,001 to 10,000	Cootehill	D0082-01	Cootehill Wastewater Treatment Plant	project progressing	project progressing	post 2029
Lough Mahon	Agglomeration PE > 10,000	Cork City	D0033-01	Cork City	under assessment	defer	2024-2027
Lough Mahon	Combined Sewer Overflows	Cork City	D0033-01	Cork City DAP	under assessment	under assessment	2024-2027
Lee (Cork) Estuary Lower	Combined Sewer Overflows	Cork City	D0033-01	Cork City DAP	under assessment	under assessment	2024-2027
Lee (Cork) Estuary Upper	Combined Sewer Overflows	Cork City	D0033-01	Cork City DAP	under assessment	under assessment	2024-2027
Argideen Estuary	Agglomeration PE > 10,000	Courtmacsherry and Timoleague	D0294-02	Timoleague/Courtmacsherry WWTP	works complete	works complete	complete
BANOGE_020	Combined Sewer Overflows	Courtown-Gorey	D0046-01	Courtown-Gorey	project progressing	project progressing	2024-2027
BANOGE_030	Combined Sewer Overflows	Courtown-Gorey	D0046-01	Courtown-Gorey	project progressing	project progressing	2024-2027
FAYMORE_010	Agglomeration PE of 500 to 1,000	Creeslough	D0534-01	Options report/ Feasibility study	to be assessed	to be assessed	2024-2027
OWENTARAGLIN_030	Agglomeration PE < 500	Cullen	A0342-01	Options report/ Feasibility study	to be assessed	to be assessed	2024-2027
FINN (DONEGAL)_080	Agglomeration PE < 500	Curragh Housing Scheme	A0364-01	Curragh Housing Scheme	not UE asset	defer	2024-2027
DAINGEAN_020	Agglomeration PE of 1,001 to 2,000	Daingean	D0226-01	Daingean WWTP	project progressing	project progressing	post 2029
FIGILE_010	Agglomeration PE of 1,001 to 2,000	Derrinturn	D0244-01	Derrinturn WWTP Upgrade (STVGP)	project progressing	project progressing	by 2027
ANNER_010	Agglomeration PE < 500	Drangan	A0412-01	Options report/ Feasibility study	to be assessed	to be assessed	2024-2027
Boyne Estuary	Agglomeration PE > 10,000	Drogheda	D0041-01	Options report/ Feasibility study	to be assessed	to be assessed	2024-2027
AHAVARRAGA STREAM_010	Agglomeration PE of 1,001 to 2,000	Dromcollagher Town and Environs	D0316-01	Dromcollagher Wastewater Treatment Plant and Network	project progressing	project progressing	post 2029

Waterbody Name	Pressure Subcategory	Agglomeration Name	Licence Code	Project or study title associated with the Pressure	Status of Pressure	Status of combined pressures on water body	Estimated Timeline
Drumshanbo stream_010	Agglomeration PE of 2,001 to 10,000	Drumshanbo	D0144-01	Options report/ Feasibility study	to be assessed	to be assessed	2024-2027
NANNY (MEATH)_040	Agglomeration PE of 2,001 to 10,000	Duleek	D0133-01	Options report/ Feasibility study	to be assessed	to be assessed	2024-2027
Inner Dundalk Bay	Agglomeration PE > 10,000	Dundalk	D0053-01	Options report/ Feasibility study	under assessment	under assessment	2024-2027
Castletown Estuary	Agglomeration PE > 10,000	Dundalk	D0053-01	Dundalk/Blackrock WWTP SDS	under assessment	defer	2024-2027
Castletown Estuary	Combined Sewer Overflows	Dundalk	D0053-01	Dundalk	under assessment	under assessment	2024-2027
Colligan Estuary	Combined Sewer Overflows	Dungarvan	D0017-01	Dungarvan Ww Network Upgrades	under assessment	under assessment	2024-2027
WHITE (LOUTH)_020	Agglomeration PE of 2,001 to 10,000	Dunleer	D0111-01	Options report/ Feasibility study	under assessment	under assessment	2024-2027
WHITE (LOUTH)_030	Agglomeration PE of 2,001 to 10,000	Dunleer	D0111-01	Options report/ Feasibility study	under assessment	under assessment	2024-2027
BANDON_030	Combined Sewer Overflows	Dunmanway	D0160-01	Wastewater Network (Upgrade) - Dunmanway	project progressing	project progressing	by 2029
BLACK (WESTMEATH)_010	Agglomeration PE of 2,001 to 10,000	Edgeworthstown	D0098-01	Edgeworthstown Wastewater Treatment Plant	project progressing	project progressing	post 2029
FERGUS_060	Combined Sewer Overflows	Ennis North	D0048-01	Ennis North	under assessment	under assessment	2024-2027
FERGUS_070	Combined Sewer Overflows	Ennis North	D0048-01	Ennis North	under assessment	under assessment	2024-2027
EYRECOURT STREAM_010	Agglomeration PE of 500 to 1,000	Eyrecourt	D0375-01	Eyrecourt Wastewater Treatment Plant	project progressing	project progressing	post 2029
BANN_060	Agglomeration PE of 2,001 to 10,000	Ferns and Environs	D0169-01	Options report/ Feasibility study	under assessment	under assessment	2024-2027
NUENNA_020	Combined Sewer Overflows	Freshford	D0526-02	Freshford Ww Network (I/I Reduction)	project progressing	project progressing	by 2027
MOUNTAIN WATER_060	Agglomeration PE of 1,001 to 2,000	Glaslough	D0347-01	Options report/ Feasibility study	under assessment	under assessment	2024-2027

Waterbody Name	Pressure Subcategory	Agglomeration Name	Licence Code	Project or study title associated with the Pressure	Status of Pressure	Status of combined pressures on water body	Estimated Timeline
GLASHANABRACK_020	Agglomeration PE of 500 to 1,000	Glenville	D0515-01	Options report/ Feasibility study	to be assessed	to be assessed	2024-2027
CANNAHOWNA_010	Agglomeration PE of 2,001 to 10,000	Gort	D0195-01	Options report/ Feasibility study	to be assessed	to be assessed	2024-2027
RHINE_010	Agglomeration PE of 2,001 to 10,000	Granard	D0187-02	Options report/ Feasibility study	under assessment	under assessment	2024-2027
LINGAUN_020	Agglomeration PE < 500	Grangemockler	A0416-01	Grangemockler WWTP	project progressing	project progressing	by 2027
MAHORE_020	Agglomeration PE of 1,001 to 2,000	Hospital Town and Environs	D0314-01	Hospital WWTP Upgrade (STVGP)	project progressing	project progressing	post 2029
ALLOW_060	Agglomeration PE of 2,001 to 10,000	Kanturk	D0203-01	Options report/ Feasibility study	under assessment	under assessment	2024-2027
NANNY (MEATH)_010	Agglomeration PE of 500 to 1,000	Kentstown	D0479-01	Kentstown WWTP Upgrade (STVGP) (OR/FS)	project progressing	project progressing	2024-2027
NANNY (MEATH)_020	Agglomeration PE of 500 to 1,000	Kentstown	D0479-01	Kentstown WWTP Upgrade (STVGP) (OR/FS)	project progressing	project progressing	2024-2027
BURNSIDE_010	Agglomeration PE < 500	Kerrykeel	A0445-01	Kerrykeel Wastewater Treatment Plant	project progressing	project progressing	by 2027
Kilcoole Stream_010	Agglomeration PE of 2,001 to 10,000	Kilcoole	D0087-01	Kilcoole WWTP Upgrade (NRRP-SM2) (OR/FS)	under assessment	defer	2024-2027
SILVER (KILCORMAC)_030	Agglomeration PE of 1,001 to 2,000	Kilcormac	D0225-01	Options report/ Feasibility study	under assessment	under assessment	2024-2027
KILDAVIN STREAM_010	Agglomeration PE < 500	Kildavin	A0097-01	Kildavin WWTP Upgrade	project progressing	project progressing	by 2027
DOUGLAS (LAOIS)_030	Agglomeration PE < 500	Kileen	A0153-01	Kileen	to be assessed	defer	2024-2027
TRIMOGE_010	Agglomeration PE of 500 to 1,000	Kilkelly	D0357-01	Options report/ Feasibility study	under assessment	under assessment	2024-2027
KILMURRIN COVE STREAM_010	Agglomeration PE < 500	Kill	A0380-01	Options report/ Feasibility study	under assessment	under assessment	2024-2027
Ross Bay	Agglomeration PE > 10,000	Killarney	D0037-01	Options report/ Feasibility study	under assessment	under assessment	2024-2027
ROSS (KILLAVULLEN)_010	Agglomeration PE of 500 to 1,000	Killavullen and Environs	D0447-01	Options report/ Feasibility study	to be assessed	to be assessed	2024-2027

Waterbody Name	Pressure Subcategory	Agglomeration Name	Licence Code	Project or study title associated with the Pressure	Status of Pressure	Status of combined pressures on water body	Estimated Timeline
BLARNEY_010	Agglomeration PE of 1,001 to 2,000	Killeens	D0329-01	Killeens WWTP Upgrade (STVGP)	project progressing	project progressing	2024-2027
CULLIES_050	Agglomeration PE of 500 to 1,000	Killeshandra	D0499-01	Options report/ Feasibility study	to be assessed	to be assessed	2024-2027
FINN (DONEGAL)_070	Agglomeration PE of 500 to 1,000	Killygordon	D0518-01	Options report/ Feasibility study	under assessment	under assessment	2024-2027
FINN (DONEGAL)_080	Agglomeration PE of 500 to 1,000	Killygordon	D0518-01	Options report/ Feasibility study	under assessment	under assessment	2024-2027
LEANNAN_050	Agglomeration PE of 500 to 1,000	Kilmacrennan	D0513-01	Kilmacrennan Sewerage Scheme	project progressing	project progressing	by 2027
MAHON_020	Agglomeration PE of 1,001 to 2,000	Kilmacthomas	D0275-01	Options report/ Feasibility study	to be assessed	to be assessed	2024-2027
GLORY_010	Agglomeration PE < 500	Kilmaganny	A0155-01	Kilmaganny WWTP	project progressing	project progressing	by 2027
KILMIHIL STREAM_010	Agglomeration PE < 500	Kilmihil	A0091-01	Kilmihil WWTP	project progressing	project progressing	post 2029
Kilcoole Stream_010	Agglomeration PE of 500 to 1,000	Kilpedder	D0416-01	Options report/ Feasibility study	under assessment	under assessment	2024-2027
GLYDE_010	Agglomeration PE of 2,001 to 10,000	Kingscourt	D0083-01	Kingscourt Wastewater Treatment Plant	project progressing	project progressing	post 2029
Kinvarra Bay	Agglomeration PE of 1,001 to 2,000	Kinvara	D0276-01	Options report/ Feasibility study	to be assessed	to be assessed	2024-2027
Lough Swilly	Combined Sewer Overflows	Letterkenny	D0009-01	Networks projects	works complete	works complete	complete
Swilly Estuary	Combined Sewer Overflows	Letterkenny	D0009-01	Networks projects	works complete	works complete	complete
AILLE (CLARE)_010	Agglomeration PE of 2,001 to 10,000	Lisdoonvarna	D0077-01	Options report/ Feasibility study	under assessment	under assessment	2024-2027
AILLE (CLARE)_020	Agglomeration PE of 2,001 to 10,000	Lisdoonvarna	D0077-01	Options report/ Feasibility study	under assessment	under assessment	2024-2027
Upper Feale Estuary	Agglomeration PE of 2,001 to 10,000	Listowel	D0179-01	Options report/ Feasibility study	to be assessed	to be assessed	2024-2027
CAMLIN_060	Combined Sewer Overflows	Longford	D0060-01	Longford	under assessment	under assessment	2024-2027

Waterbody Name	Pressure Subcategory	Agglomeration Name	Licence Code	Project or study title associated with the Pressure	Status of Pressure	Status of combined pressures on water body	Estimated Timeline
KILCOLGAN_020	Agglomeration PE of 2,001 to 10,000	Loughrea	D0194-01	Options report/ Feasibility study	under assessment	under assessment	2024-2027
KILCOLGAN_030	Agglomeration PE of 2,001 to 10,000	Loughrea	D0194-01	Options report/ Feasibility study	under assessment	under assessment	2024-2027
Malahide Bay	Agglomeration PE > 10,000	Malahide	D0021-01	Options report/ Feasibility study	under assessment	under assessment	2024-2027
LESLIE HILL STREAM_020	Agglomeration PE of 500 to 1,000	Manorcunningham	D0519-01	Options report/ Feasibility study	to be assessed	to be assessed	2024-2027
Owenacurra Estuary	Combined Sewer Overflows	Midleton	D0056-01	Midleton Wastewater Network Upgrades	project progressing	project progressing	post 2029
Fern	Agglomeration PE of 1,001 to 2,000	Milford	D0342-01	Milford, Ramelton and Rathmullan Wastewater Treatment Plant	project progressing	project progressing	by 2027
MAGGY'S BURN_010	Agglomeration PE of 1,001 to 2,000	Milford	D0342-01	Milford, Ramelton and Rathmullan Wastewater Treatment Plant	project progressing	project progressing	by 2027
MILLTOWNPASS_010	Agglomeration PE < 500	Millview Housing Estate (Milltownpass)	A0527-01	Millview H.E. (Milltownpass) WWTP	project progressing	project progressing	by 2027
FUNSHION_030	Agglomeration PE of 2,001 to 10,000	Mitchelstown	D0202-01	Options report/ Feasibility study	under assessment	under assessment	2024-2027
GRADOGE_010	Combined Sewer Overflows	Mitchelstown	D0202-01	Mitchelstown	project progressing	project progressing	post 2029
MOATE STREAM_010	Agglomeration PE of 2,001 to 10,000	Moate	D0097-01	Options report/ Feasibility study	to be assessed	to be assessed	2024-2027
RINN_010	Agglomeration PE of 1,001 to 2,000	Mohill	D0277-01	Options report/ Feasibility study	under assessment	under assessment	2024-2027
BLACKWATER (MONAGHAN)_040	Agglomeration PE > 10,000	Monaghan	D0061-01	Options report/ Feasibility study	to be assessed	to be assessed	2024-2027
SHAMBLES_010	Agglomeration PE > 10,000	Monaghan	D0061-01	Options report/ Feasibility study	to be assessed	to be assessed	2024-2027

Waterbody Name	Pressure Subcategory	Agglomeration Name	Licence Code	Project or study title associated with the Pressure	Status of Pressure	Status of combined pressures on water body	Estimated Timeline
BARROW_100	Combined Sewer Overflows	Monasterevin Town	D0177-01	Monasterevin Town	to be assessed	to be assessed	2024-2027
CROSS (ROSCOMMON)_030	Agglomeration PE > 10,000	Monksland	D0042-01	Options report/ Feasibility study	to be assessed	to be assessed	2024-2027
CASTLEGAR_020	Agglomeration PE of 1,001 to 2,000	Mountbellew	D0219-01	Mountbellew WWTP Upgrade	project progressing	project progressing	post 2029
OWENASS_020	Agglomeration PE of 2,001 to 10,000	Mountmellick	D0152-01	Options report/ Feasibility study	to be assessed	to be assessed	2024-2027
BREDAGH_010	Agglomeration PE of 2,001 to 10,000	Moville	D0212-01	Moville Wastewater Treatment Plant	project progressing	project progressing	post 2029
Ballyquirke	Agglomeration PE of 2,001 to 10,000	Moycullen	D0191-01	Options report/ Feasibility study	under assessment	under assessment	2024-2027
GALEY_030	Agglomeration PE < 500	Moyvane	A0026-01	Options report/ Feasibility study	to be assessed	to be assessed	2024-2027
BARROW_200	Agglomeration PE of 2,001 to 10,000	Muinebheag and Leighlinbridge	D0090-01	Muinebheag and Leighlinbridge Wastewater Treatment Plant	project progressing	project progressing	by 2027
MULLAGH LOUGH STREAM_010	Agglomeration PE of 1,001 to 2,000	Mullagh	D0252-01	Mullagh WWTP Upgrade (STVGP)	project progressing	project progressing	by 2029
MOYNALTY_040	Agglomeration PE of 1,001 to 2,000	Mullagh	D0252-01	Mullagh WWTP Upgrade (STVGP)	project progressing	project progressing	by 2029
MOYNALTY_050	Agglomeration PE of 1,001 to 2,000	Mullagh	D0252-01	Mullagh WWTP Upgrade (STVGP)	project progressing	project progressing	by 2029
MOYNALTY_060	Agglomeration PE of 1,001 to 2,000	Mullagh	D0252-01	Mullagh WWTP Upgrade (STVGP)	project progressing	project progressing	by 2029
MULLINAHONE STREAM_010	Agglomeration PE of 500 to 1,000	Mullinahone	D0456-01	Options report/ Feasibility study	under assessment	under assessment	2024-2027
NEWCASTLE (WICKLOW)_010	Agglomeration PE of 500 to 1,000	Newcastle	D0410-01	Options report/ Feasibility study	to be assessed	to be assessed	2024-2027
MOYNAGH_040	Agglomeration PE of 500 to 1,000	Nobber	D0487-01	Options report/ Feasibility study	under assessment	under assessment	2024-2027
BALLYBOGHIL_010	Agglomeration PE < 500	Oldtown	A0106-01	Oldtown WWTP	project progressing	project progressing	by 2027
BARROW_080	Agglomeration PE > 10,000	Portarlington	D0158-01	Portarlington WWTP Upgrade (LTCGP) (OR/FS)	under assessment	defer	2024-2027

Waterbody Name	Pressure Subcategory	Agglomeration Name	Licence Code	Project or study title associated with the Pressure	Status of Pressure	Status of combined pressures on water body	Estimated Timeline
BARROW_080	Combined Sewer Overflows	Portarlington	D0158-01	Portarlington	under assessment	under assessment	2024-2027
TRIOGUE_020	Combined Sewer Overflows	Portlaoise	D0001-01	Portlaoise DAP	under assessment	under assessment	2024-2027
CARN LOW_010	Agglomeration PE of 1,001 to 2,000	Ramelton	D0341-01	Milford, Ramelton and Rathmullan Wastewater Treatment Plant	project progressing	project progressing	by 2027
SWILLY BURN_010	Agglomeration PE of 1,001 to 2,000	Raphoe	D0209-01	Options report/ Feasibility study	under assessment	under assessment	2024-2027
SLATE_070	Combined Sewer Overflows	Rathangan	D0175-01	Rathangan WW networks	project progressing	project progressing	post 2029
ERKINA_030	Agglomeration PE of 2,001 to 10,000	Rathdowney	D0288-01	Options report/ Feasibility study	under assessment	under assessment	2024-2027
BROADMEADOW_010	Combined Sewer Overflows	Ringsend	D0034-01	Ratoath Main PS upgrade, Ratoath (operational improvements completed 2021)	project progressing	project progressing	post 2029
BROADMEADOW_020	Combined Sewer Overflows	Ringsend	D0034-01	Ashbourne PS upgrade (operational improvements completed 2021)	project progressing	project progressing	post 2029
WARD_020	Combined Sewer Overflows	Ringsend	D0034-01	Ringsend DAP	under assessment	under assessment	2024-2027
WARD_030	Combined Sewer Overflows	Ringsend	D0034-01	Ringsend DAP	under assessment	under assessment	2024-2027
Tolka Estuary	Combined Sewer Overflows	Ringsend	D0034-01	Sutton DAP	under assessment	under assessment	2024-2027
Liffey Estuary Lower	Agglomeration PE > 10,000	Ringsend	D0034-01	Ringsend Wastewater Treatment Plant Upgrade	project progressing	defer	by 2027
Liffey Estuary Lower	Combined Sewer Overflows	Ringsend	D0034-01	Ringsend DAP	under assessment	under assessment	2024-2027
CAMAC_040	Combined Sewer Overflows	Ringsend	D0034-01	Ringsend DAP	under assessment	under assessment	2024-2027

Waterbody Name	Pressure Subcategory	Agglomeration Name	Licence Code	Project or study title associated with the Pressure	Status of Pressure	Status of combined pressures on water body	Estimated Timeline
DODDER_050	Combined Sewer Overflows	Ringsend	D0034-01	Ringsend DAP	under assessment	under assessment	2024-2027
LIFFEY_170	Combined Sewer Overflows	Ringsend	D0034-01	Ringsend DAP	under assessment	under assessment	2024-2027
LIFFEY_180	Combined Sewer Overflows	Ringsend	D0034-01	Ringsend DAP	under assessment	under assessment	2024-2027
LIFFEY_190	Combined Sewer Overflows	Ringsend	D0034-01	Ringsend DAP	under assessment	under assessment	2024-2027
SANTRY_010	Combined Sewer Overflows	Ringsend	D0034-01	Ringsend DAP	under assessment	under assessment	2024-2027
SANTRY_020	Combined Sewer Overflows	Ringsend	D0034-01	Ringsend DAP or networks programme	under assessment	under assessment	2024-2027
TOLKA_050	Combined Sewer Overflows	Ringsend	D0034-01	Ringsend DAP	under assessment	under assessment	2024-2027
TOLKA_060	Combined Sewer Overflows	Ringsend	D0034-01	Ringsend DAP	under assessment	under assessment	2024-2027
CASTLEJORDAN_010	Agglomeration PE of 2,001 to 10,000	Rochfortbridge	D0101-01	Options report/ Feasibility study	to be assessed	to be assessed	2024-2027
JIGGY (HIND)_010	Combined Sewer Overflows	Roscommon Town & Environs	D0116-01	Roscommon Town Sewerage Scheme	project progressing	project progressing	by 2027
BUNOW_020	Agglomeration PE > 10,000	Roscrea	D0025-01	Options report/ Feasibility study	under assessment	under assessment	2024-2027
LITTLE BROSNA_020	Agglomeration PE > 10,000	Roscrea	D0025-01	Options report/ Feasibility study	under assessment	under assessment	2024-2027
SHANAGOLDEN STREAM_010	Agglomeration PE < 500	Shanagolden	A0219-01	Options report/ Feasibility study	to be assessed	to be assessed	2024-2027
KILL OF THE GRANGE STREAM_010	Combined Sewer Overflows	Shanganagh-Bray	D0038-02	Shanganagh-Bray	under assessment	under assessment	2024-2027
Sillan	Agglomeration PE of 500 to 1,000	Shercock	D0495-01	Options report/ Feasibility study	under assessment	under assessment	2024-2027
Ilen Estuary	Combined Sewer Overflows	Skibbereen	D0166-01	Skibbereen	to be assessed	to be assessed	2024-2027

Waterbody Name	Pressure Subcategory	Agglomeration Name	Licence Code	Project or study title associated with the Pressure	Status of Pressure	Status of combined pressures on water body	Estimated Timeline
DELVIN_040	Agglomeration PE of 2,001 to 10,000	Stamullen	D0262-01	Stamullen Wastewater Treatment Plant	project progressing	project progressing	by 2027
Broadmeadow Water	Agglomeration PE > 10,000	Swords	D0024-01	Options report/ Feasibility study	to be assessed	to be assessed	2024-2027
SUIR_030	Agglomeration PE of 2,001 to 10,000	Templemore	D0190-01	Options report/ Feasibility study	to be assessed	to be assessed	2024-2027
SUIR_070	Combined Sewer Overflows	Thurles	D0026-01	Thurles WW Network Upgrade	project progressing	project progressing	by 2029
Lee K Estuary	Combined Sewer Overflows	Tralee	D0040-01	Tralee Ww Network Upgrades	under assessment	under assessment	2024-2027
LEE (TRALEE)_030	Combined Sewer Overflows	Tralee	D0040-01	Tralee Ww Network Upgrades	under assessment	under assessment	2024-2027
TUBBERCURRY STREAM_010	Combined Sewer Overflows	Tubbercurry	D0092-01	Tubbercurry WWTP	works complete	works complete	complete
LISKENNY_010	Agglomeration PE of 1,001 to 2,000	Tulla	D0320-01	Options report/ Feasibility study	to be assessed	to be assessed	2024-2027
SLANEY_100	Agglomeration PE of 2,001 to 10,000	Tullow	D0091-01	Tullow Wastewater Treatment Plant	project progressing	project progressing	by 2027
Ramor	Agglomeration PE of 2,001 to 10,000	Virginia	D0255-01	Virginia Wastewater Treatment Plant	project progressing	project progressing	by 2027
FLESK (BRIDE)_010	Agglomeration PE of 2,001 to 10,000	Watergrasshill	D0201-01	Watergrasshill	to be assessed	defer	2024-2027
FLESK (BRIDE)_010	Combined Sewer Overflows	Watergrasshill	D0201-01	Watergrasshill	to be assessed	to be assessed	2024-2027
Wexford Harbour	Agglomeration PE > 10,000	Wexford town	D0030-02	Options report/ Feasibility study	to be assessed	to be assessed	2024-2027
Lower Slaney Estuary	Agglomeration PE > 10,000	Wexford town	D0030-02	Options report/ Feasibility study	to be assessed	to be assessed	2024-2027

Notes:

Based on the EPA dataset of October 2023 significant pressures refresh which listed UWW significant pressure agglomerations, pressure sub-category of WWTP or networks and the water bodies that were impacted by those agglomerations and sub-categories (209 lines)

For each of the 209 lines the associated Status of Pressure and Status of combined pressures on water body have one of 5 status categories assigned:

1. to be assessed
2. under assessment
3. project progressing
4. works complete
5. defer (Where one of duplicate water body lines has a status deferred to the other duplicate water body line, the status is marked as 'defer')

Note for the 'under assessment' category, it was noted whether it was in Drainage Area Plan (DAP) or other networks assessment or a Feasibility Study(FS) for wastewater treatment which usually includes water quality modelling or water quality assessment as appropriate.

Note 'to be assessed' and 'under assessment' categories involve a range of ecological, water quality, economic and other assessments to understand the nature of the pressure and the best investment option to deliver the right measure in the right place.

Note 'works complete' or 'projects progressing' categories include for the most part where works have been carried out to (or the current project will) meet WWDA requirements. In a small number of cases it refers to where significant upgrades have been carried out, and while not fully meeting WWDA requirements, a judgement was made that these works would be likely to address the significant pressure.

For each of the 197 water bodies:

Assigns the earliest stage category for each water body (for example, if there were 2 pressures on a WB and one was complete but the other under assessment, the WB is assigned the earlier status of under assessment.

www.gov.ie/RBMP

Department of Housing,
Local Government and Heritage



Rialtas na hÉireann
Government of Ireland

Rialtas na hÉireann
Government of Ireland

Water Action Plan 2024

A River Basin Management Plan for Ireland

Appendix 8: Improvement Works to SWO's - Uisce Éireann

Prepared by the Department of Housing, Local Government and Heritage
www.gov.ie/RBMP

Reference	Project Name	Estimated Completion Year	Project likely to address Urban Wastewater Significant Pressure	SWO Improvement Works (No. of SWOs)	2022	2023	2024	2025	2026	2027
				Totals: 139	**1**	**24**	**28**	**22**	**35**	**29**
A0072	Omeath WWTP	2024		2			2			
A0079	Kilfenora (Clare) WWTP	2023		1		1				
A0091	Kilmihil WWTP	2025	✖	0				0		
A0097	Kildavin WWTP	2025	✖	1				1		
A0099	Tinryland WWTP	2025	✖	1				1		
A0105	Ballymoe WWTP	2025	✖	1				1		
A0106	Oldtown WWTP	2025	✖	2				2		
A0111	Woodford WWTP	2025	✖	0				0		
A0115	Roundstone WWTP and Network	2026		1					1	
A0155	Kilmaganny WWTP	2025	✖	0				0		
A0167	Cloneygowan WWTP	2025	✖	1				1		
A0208	Galbally WWTP	2025	✖	1				1		
A0277	Lecarrow WWTP	2025		1				1		
A0294	Ballintra WWTP	2025	✖	1				1		
A0307	Carrigans WWTP	2023		0		0				
A0326	Ballydesmond WWTP	2027		1						1
A0349	Inchigeelagh WWTP	2023		1		1				
A0361	Ballincurrig - Lisgoold WWTP	2027								0
A0377	Clonea Power WWTP	2025	✖	0				0		
A0416	Grangemockler WWTP	2025	✖	0				0		
A0445	Kerrykeel WWTP	2023	✖	2		2				
A0446	Burtonport WWTP New Build	2024		0			0			
A0461	Pettigo WWTP	2025	✖	0				0		
A0525	Coolatee WWTP	2024		2			2			
A0527	Millview (Milltownpass) WWTP	2025	✖	1				1		
A0548	Ahascragh WWTP	2023	✖	1		1				
D0001	Portlaoise WWTP	2026		1					1	

Reference	Project Name	Estimated Completion Year	Project likely to address Urban Wastewater Significant Pressure	SWO Improvement Works (No. of SWOs)	2022	2023	2024	2025	2026	2027
D0002	Upper Liffey Valley WW network (Phase 3) - Contract 2B	2022		0	0					
D0004	Leixlip Transfer Pipeline	2022		0	0					
D0004	Maynooth Transfer Pipeline	2026		1					1	
D0004	Lower Liffey Valley WW Network - East Maynooth	2026		0					0	
D0004	Lower Liffey Valley WW Network Extensions - Celbridge	2026		0					0	
D0004	Lower Liffey Valley WW Network Extensions - Kilcock	2026		0					0	
D0004	Lower Liffey Valley WW Network Reinforcement - Celbridge	2024		1			1			
D0004	Lower Liffey Valley WW Network - Castletown WW Pumping Station and Rising Main Upgrade	2026		1					1	
D0006	Arklow WWTP	2025		1				1		
D0007	Athlone WW Network (main drainage)	2026		7					7	
D0007	Athlone WW Network (Infiltration reduction)	2024		3			3			
D0013	Limerick WWTP	2027		1						1
D0013	Limerick WW Network - Mungret, Limerick	2026		0					0	
D0019	Castletroy WWTP	2027		1						1
D0027	Nenagh New WWTP	2026		0					0	
D0028	Carlow WWTP	2026		1					1	
D0030	Wexford WW Network - Distillery Road Pumping Station	2026		2					2	
D0033	Cork City WW Network - Ballyvolane Pumping Station, Cork	2025		1				1		
D0034	Ringsend WW Network Reinforcement - Landscape Road	2023		0		0				
D0034	Ringsend WW Network Reinforcement Project - Johnstown Road	2023		1		1				
D0034	Ringsend WWTP	2025		1				1		
D0034	Ringsend -Grand Canal Tunnel Sewer Outfall Extension	2026	✖	5					5	
D0034	Ringsend WW Main Lift Pump Station Upgrade	2022		0	0					
D0034	Ringsend - Belmayne Wastewater Network	2023		0		0				
D0034	Ringsend WW Network -Liffey Siphon (Rosie Hackett Bridge)	2027								0

Reference	Project Name	Estimated Completion Year	Project likely to address Urban Wastewater Significant Pressure	SWO Improvement Works (No. of SWOs)	2022	2023	2024	2025	2026	2027
D0034	Ringsend WW Network - Walkinstown	2026		0					0	
D0034	Ringsend WW Network - Santry Pumping Station Upgrade	2027	✖	1						1
D0034	Ringsend WW Network - Ballyogan, Dublin	2025		0				0		
D0034	Ringsend WW Network - Moreen, Sandyford	2025		0				0		
D0034	Ringsend WW Network - Milltown	2026							0	
D0034	Ringsend WW Network - Sandyford	2027								0
D0034	Ringsend WW Network - Blanchardstown Duplication of 9C Sewer & Storage	2023	✖	1		1				
D0034	Ringsend WW Network - Doldrum Bay	2025		0				0		
D0034	Ringsend WW Network Reinforcement - Portmarnock	2023		1		1				
D0034	Ringsend WW Network Ballymun Regeneration - Sillogue	2023		0		0				
D0034	Ringsend WW Network - Fosterstown, Fingal	2025		0				0		
D0034	Ringsend WW Network Extensions - Clonburris	2023		0		0				
D0034	Ringsend WW Network Reinforcement Project - SDCC	2023		0		0				
D0034	Ringsend WW Network (New) - Celbridge Link Road, Dublin	2023		0		0				
D0034	Ringsend WW Network - Public Works Service Agreement - Tay Lane Pumping Station	2026		1					1	
D0034	Ringsend WW Network - Tobbermaclugg Pumping Station Upgrade	2025		0				0		
D0037	Kilcummin Wastewater Network	2024					0			
D0038	Shanganagh WW Network Extensions - Woodbrook	2025		1				1		
D0038	Shanganagh WW Network Extensions - Kilternan	2023		0		0				
D0038	Shanganagh WW Network Reinforcement Project - DLRCC	2023		1		1				
D0041	Drogheda Wastewater Network (Upgrade)	2026		0					0	
D0041	Drogheda WW Network - South Drogheda	2026		0					0	
D0048	Clonroadmore WWTP	2027		0						0
D0050	Galway City WW Network - Ardaun	2025		0				0		
D0052	Mallow WWTP	2023		1		1				

Reference	Project Name	Estimated Completion Year	Project likely to address Urban Wastewater Significant Pressure	SWO Improvement Works (No. of SWOs)	2022	2023	2024	2025	2026	2027
D0052	Mallow WW Network	2023		1		1				
D0053	Dundalk WW Network Programme - Mount Avenue, Dundalk	2022		0	0					
D0053	Dundalk East Wastewater Network	2026		0					0	
D0053	Dundalk WW Network - St. Helena's Pumping Station and Rising Main	2026		0					0	
D0056	Midleton WWTP	2027		1						1
D0058	Fermoy Wastewater Network	2024		1			1			
D0059	Navan WW Network Programme - Farganstown, Navan	2026		0					0	
D0062	Carrickmacross WWTP	2024	✖	1			1			
D0063	Blessington WWTP	2023	✖	0		0				
D0071	Claremorris WWTP	2025		0				0		
D0075	Kilrush WWTP	2023		0		0				
D0078	Kilkee WWTP	2025		1				1		
D0079	Newmarket-on-Fergus WWTP	2026		1					1	
D0080	Lahinch WWTP	2027		1						1
D0081	Ennistymon WWTP	2026		1					1	
D0082	Cootehill WWTP	2026	✖	0					0	
D0083	Kingscourt WWTP	2026	✖	0					0	
D0085	Bailieborough WWTP	2026	✖	1					1	
D0090	Muinebheag & Leighlinbridge WWTP	2026		1					1	
D0091	Tullow WWTP	2023	✖	0		0				
D0096	Ballymahon WWTP	2027		2						2
D0098	Edgeworthstown WWTP	2027	✖	1						1
D0108	Newcastle West WWTP	2027		1						1
D0110	Edenderry WWTP	2026		1					1	
D0114	Portrane/ Donabate WW Network Extensions - Donabate Road	2024		1			1			
D0116	Roscommon Wastewater Network	2024	✖	0			0			

Reference	Project Name	Estimated Completion Year	Project likely to address Urban Wastewater Significant Pressure	SWO Improvement Works (No. of SWOs)	2022	2023	2024	2025	2026	2027
D0117	Ardee WWTP partial upgrade (P removal)	2024	✖				0			
D0120	Ballybofey WW Network	2025	✖	3				3		
D0123	Ballaghaderreen WWTP	2025		0				0		
D0125	Buncrana WWTP	2027		1						1
D0125	Buncrana Wastewater Network	2026		5					5	
D0126	Macroom WWTP	2026		0					0	
D0131	Enfield WWTP	2025		1				1		
D0132	Kinsale WW Network - Outfall Extension	2022		0	0					
D0134	Castlemartyr WWTP	2024		0			0			
D0136	Bandon WW Network	2023	✖	8		8				
D0152	Mountmellick WWTP partial upgrade (P removal)	2024		0			0			
D0164	Fethard WWTP	2026		5					5	
D0167	Cahir WWTP	2025		0				0		
D0184	Kenmare WWTP	2024		0			0			
D0189	Ballina (Tipp) WWTP	2024	✖	1			1			
D0193	Athenry Wastewater Network	2026		0					0	
D0199	Clareabbey WWTP	2027		0						0
D0202	Mitchelstown WWTP CM project	2022	✖	0	0					
D0206	Clones WWTP partial upgrade	2024		0			0			
D0207	Ballybay WWTP partial upgrade	2023		0		0				
D0212	Moville WWTP	2027	✖	8						8
D0216	Balla WWTP partial upgrade (P removal)	2024		0			0			
D0222	Aughrim WWTP	2027								0
D0225	Kilcormac WWTP partial upgrade (P removal)	2024		6			6			
D0226	Daingean WWTP partial upgrade	2023		4		4				
D0227	Rhode WWTP	2027								0
D0232	Kilmore Quay WWTP	2024		1			1			
D0244	Derrinturn WWTP	2027	✖	5						5

Reference	Project Name	Estimated Completion Year	Project likely to address Urban Wastewater Significant Pressure	SWO Improvement Works (No. of SWOs)	2022	2023	2024	2025	2026	2027
D0245	Duncannon WWTP	2023		1		1				
D0249	Sligo and Environs WW Network (Rosses Point)	2024		1			1			
D0250	Longwood WWTP	2027								0
D0252	Mullagh WWTP	2027	✖	4						4
D0255	Virginia WWTP	2024	✖	1			1			
D0256	Ballyjamesduff WWTP	2024	✖	3			3			
D0262	Stamullen WWTP	2024	✖	0			0			
D0269	Castlebellingham WWTP	2027		0						0
D0297	Castletownbere WWTP	2022		0	0					
D0298	Cloyne WWTP	2027		0						0
D0312	Adare WWTP	2027		0						0
D0316	Dromcollagher WWTP	2027	✖	1						1
D0322	Clarecastle Wastewater Network	2023		0		0				
D0325	Newport (TN) WWTP	2024		1			1			
D0326	Borrisokane WWTP partial upgrade	2022		1	1					
D0327	Ballyvaughan WWTP	2025		0				0		
D0341	Ramelton WWTP (Part of Ramelton, Milford and Rathmullan WWTP)	2025	✖	0				0		
D0342	Milford (Donegal) WWTP (Part of Ramelton, Milford and Rathmullan WWTP)	2025	✖	0				0		
D0345	Rathmullan WWTP (Part of Ramelton, Milford and Rathmullan WWTP)	2025		0				0		
D0352	Lifford WWTP	2024		0			0			
D0355	Ballindine WWTP partial upgrade	2023		0		0				
D0358	Baile na nGall WW Network- Pumping Stations and Rising Mains Upgrades	2026		0					0	
D0371	Ballygar WWTP	2027		0						0
D0385	Ballyroan WWTP	2025	✖	1				1		
D0387	Castletown (Laois) WWTP	2027		0						0

Reference	Project Name	Estimated Completion Year	Project likely to address Urban Wastewater Significant Pressure	SWO Improvement Works (No. of SWOs)	2022	2023	2024	2025	2026	2027
D0388	Carraroe WWTP	2027		0						0
D0396	Spiddal WWTP	2024		1			1			
D0411	Avoca WWTP	2025		0				0		
D0423	Whitegate/Aghada WWTP	2024		1			1			
D0426	Dripsey Network and WWTP	2022		0	0					
D0429	Innishannon WWTP	2022		0	0					
D0430	Liscannor WWTP	2023		0		0				
D0437	Boherbue WWTP	2024		1			1			
D0468	Castletownsend WWTP	2024		0			0			
D0495	Shercock WWTP partial upgrade	2022		0	0					
D0498	Blacklion WWTP partial upgrade	2022		0	0					
D0499	Killeshandra WWTP partial upgrade	2023		0		0				
D0502	Foynes WWTP	2025		2				2		
D0504	Glin WWTP	2025		0				0		
D0507	Ballingarry (Limerick) WWTP partial upgrade (IWSS & P removal)	2024		0			0			
D0513	Kilmacrennan WWTP	2026	✖	0					0	
D0516	Ballycotton WWTP New Build	2025		0				0		
D0520	Kilcar WWTP	2023		0		0				
D0522	Mountcharles WWTP	2026		0					0	
D0523	Carrigart WWTP	2026		0					0	
D0530	Ballyhale-Knocktopher WWTP partial upgrade	2024		0			0			
D0537	Killea WWTP	2024		0			0			

www.gov.ie/RBMP

Department of Housing,
Local Government and Heritage



Rialtas na hÉireann
Government of Ireland

Rialtas na hÉireann
Government of Ireland

Water Action Plan 2024

A River Basin Management Plan for Ireland

Appendix 9: Uisce Éireann RC3 Project List

(Revenue Control Period 3 2020-2024)

Prepared by the Department of Housing, Local Government and Heritage
www.gov.ie/RBMP

RC3 2020-2024 Wastewater : Wastewater Stand Alone Projects (Spend > €100k in period)
Wastewater Treatment Plants
Greater Dublin Drainage Project
Ringsend Wastewater Treatment Plant Upgrade
Arklow Sewerage Scheme - Wastewater Treatment Plant
Milford, Ramelton and Rathmullan Wastewater Treatment Plant
Kenmare Wastewater Treatment Plant
Mallow Wastewater Treatment Plant
Whitegate/Aghada Wastewater Treatment Plant
Kilmore Quay Village and Environs Waste Water Outfall
Ballycotton Wastewater Treatment Plant
Macroom Wastewater Treatment Plant
Stamullen Wastewater Treatment Plant
Kilrush Wastewater Treatment Plant
Arthurstown, Ballyhack and Duncannon Wastewater Treatment Plants
Castletownsend Wastewater Treatment Plant
Castletownbere Wastewater Treatment Plant
Omeath Sewerage Scheme - Wastewater Outfall
Tullow Wastewater Treatment Plant
Boherbue Wastewater Treatment Plant
Enfield Wastewater Treatment Plant
INTERREG VA SWELL Project
Ballina Wastewater Treatment Plant
Carrickmacross Wastewater Treatment Plant
Castlemartyr Wastewater Treatment Plant
Liscannor Wastewater Treatment Plant
Kilfenora Wastewater Treatment Plant
Bandon Sewerage Scheme - Wastewater Treatment Plant Upgrade
Burtonport Wastewater Treatment Plant
Newport (Tipperary) Wastewater Treatment Plant
Ballyjamesduff Wastewater Treatment Plant
Virginia Wastewater Treatment Plant
Innishannon Sewerage Scheme - Wastewater Treatment Plant Upgrade
Inchigeelagh Wastewater Treatment Plant
Coachford Sewerage Scheme - Wastewater Treatment Plant
Kilkee Wastewater Treatment Plant
Muinebheag and Leighlinbridge Wastewater Treatment Plant
Kerrykeel Wastewater Treatment Plant
Newmarket-on-Fergus Wastewater Treatment Plant

RC3 2020-2024 Wastewater : Wastewater Stand Alone Projects (Spend > €100k in period)
Avoca Wastewater Treatment Plant
Ballyvourney/Ballymakeera Sewerage Scheme - Wastewater Treatment Plant
Kilcar Wastewater Treatment Plant
Ballaghaderreen Wastewater Treatment Plant
Claremorris Wastewater Treatment Plant
Dripsey Sewerage Scheme - Network and Wastewater Treatment Plant
Spiddal Wastewater Treatment Plant
Killala Sewerage Scheme - Network and Wastewater Treatment Plant
Nenagh New Wastewater Treatment Plant
Glin Wastewater Treatment Plant
Buncrana Wastewater Treatment Plant
Ballyvaughan Wastewater Treatment Plant
Blessington Wastewater Treatment Plant
Cahir Wastewater Treatment Plant
Quin Wastewater Treatment Plant
Osberstown Sludge Hub
Tipperary-Town Wastewater Treatment Plant Upgrade
Collooney Wastewater Treatment Plant
Ahascragh Wastewater Treatment Plant
Ballymote Wastewater Treatment Plant
Foynes Wastewater Treatment Plant
Grange/Strandhill/Tubbercurry Sewerage Scheme - Wastewater Treatment Plant Upgrades
Foxford Sewerage Scheme
Lahinch Wastewater Treatment Plant
Moville Wastewater Treatment Plant
Coolatee Wastewater Treatment Plant
Kingscourt Wastewater Treatment Plant
Millstreet Sewerage Scheme - Wastewater Treatment Plant Upgrade
Carlow Wastewater Treatment Plant
Castletroy Wastewater Treatment Plant
Clonroadmore Wastewater Treatment Plant
Newcastle West Wastewater Treatment Plant
Cootehill Wastewater Treatment Plant
Castlemaine Sewerage Scheme - Wastewater Treatment Plant Upgrade
Falcarragh Wastewater Treatment Plant
Dromcollagher Wastewater Treatment Plant and Network
Charlestown Sewerage Scheme
Carrigrennan Wastewater Treatment Plant Upgrade

RC3 2020-2024 Wastewater : Wastewater Stand Alone Projects (Spend > €100k in period)
Clareabbey Wastewater Treatment Plant
Fethard Wastewater Treatment Plant
Waterford City Wastewater Treatment Plant (to G2)
Portlaoise Wastewater Treatment Plant
Cloyne Wastewater Treatment Plant
Bailieborough Wastewater Treatment Plant
Edgeworthstown Wastewater Treatment Plant
Ballymahon Wastewater Treatment Plant
Ardee Sewerage Scheme - Wastewater Treatment Plant Upgrade
Edenderry Wastewater Treatment Plant
Glenamaddy Sewerage Scheme
Navan Wastewater Treatment Plant
Adare Wastewater Treatment Plant
Donegal (Group B) Sewerage Schemes - Wastewater Treatment Plants
Limerick Wastewater Treatment Plant
Courtmacsherry/Timoleague Sewerage Scheme
Roundstone Wastewater Treatment Plant and Network
Carraroe Waste Water Outfall
Newport Wastewater Treatment Plant
Mitchelstown Sewerage Scheme - Network Upgrade and Wastewater Treatment Plant Inlet works
Castleblaney Sewerage Scheme (Phase 1) - Wastewater Treatment Plant Upgrade
Waterville Water and Wastewater Scheme - Treatment Plants
Manorhamilton Sewerage Scheme - Wastewater Treatment Plant Upgrade
Upper Liffey Valley Sewerage Scheme (Phase 3) - Osberstown Wastewater Treatment Plant Upgrade
Ballybofey/Stranorlar Sewerage Scheme - Wastewater Treatment Plant and Network
Mohill Sewerage Scheme - Wastewater Treatment Plant Upgrade
Donabate Distributor Road Rising Main Extension
Drumshanbo Wastewater Treatment Plant
Ardfert Sewerage Scheme - Wastewater Treatment Plant Upgrade
Enniscorthy Sewerage Scheme (Phase 3) - Wastewater Treatment Plant Upgrade
Malahide Wastewater Treatment Plant
Athlone Sewerage Scheme - Interim Wastewater Treatment Plant Upgrade
Portrane, Donabate, Rush and Lusk Sewerage Scheme -Contract 3 (Rush)
Wastewater Networks
Athlone Main Drainage Interim Upgrade
GDRDP: Blanchardstown Sewerage Scheme (Phase 2) - Contract 2 (Duplication of 9C Sewer & Storage)
Upper Liffey Valley Sewerage Scheme (Phase 3) - Contract 2B (Network)
Leixlip Transfer Pipeline

RC3 2020-2024 Wastewater : Wastewater Stand Alone Projects (Spend > €100k in period)
Network Extensions (Wastewater) - Midleton
Roscommon Town Sewerage Scheme
Maynooth Transfer Pipeline
Buncrana Wastewater Network
Grand Canal Tunnel Sewer Outfall Extension
Mallow Sewerage Scheme - Network
Athenry Wastewater Network
Bandon Watermain and Sewer Network Upgrade
Upper Liffey Valley Sewerage Scheme (Phase 3) - Contract 2A (Network)
Athlone Main Drainage - I&I Reduction
Sligo and Environs Sewerage Scheme - Network (Rosses Point)
Kilcummin Wastewater Network
Wastewater Network (New) - Tullow
Shannon Wastewater Treatment Plant (Phase 2)
Wastewater Network (Upgrade) - Drogheda, Louth
Network Extensions (Wastewater) - Clonburris
Main Lift Pump Station Upgrade
Local Network Reinforcement Project - Celbridge
Network Extensions (Wastewater) - Woodbrook, Shanganagh
Network Extensions (Wastewater) - Kilcock, Boycetown
Balbriggan/Skerries Sewerage Scheme (Phase 3) - Loughshinny
Network Extensions (Wastewater) - Donabate Road
Baile na nGall Pumping Stations and Rising Mains Upgrades
Balbriggan/Skerries Sewerage Scheme - Rush Road
Doldrum Bay Wastewater Network
Letterkenny Sewerage Scheme - Network
Clarecastle Wastewater Network
Galway City Wastewater Network
Local Network Reinforcement Project - Fingal
St. Helena's Pumping Station and Rising Main - Assessment & Replacement
Local Network Reinforcement Project - Goatstown Road
Network Extensions (Wastewater) - Celbridge (Ballyoulster)
9C Sewer Rehabilitation - Grand Canal, Luas & Regional Road Crossing
Lower Liffey Valley
Cork City Wastewater Network
Local Network Reinforcement Project - SDCC
Ballinasloe Sewerage Scheme
Midleton Wastewater Treatment Plant

RC3 2020-2024 Wastewater : Wastewater Stand Alone Projects (Spend > €100k in period)
Network Extensions (Wastewater) - Oscar Traynor Rd
Local Network Reinforcement Project - DLRCC
Portmarnock Strand Wastewater Pumping Station Upgrade
Navan Wastewater Network
Tullamore Wastewater Network
Roscrea Wastewater Network
Thurles Wastewater Network
Liffey Siphon (Rosie Hackett Bridge)
Wastewater Network (Upgrade) - Belmullet, Mayo
Wastewater Network (Upgrade) - Dunmanway
Local Network Reinforcement Project - Portmarnock
Kinsale Outfall Extension
Wastewater Network (Upgrade) - Tramore, Waterford
Liffey Siphon Refurbishment
Dundalk East Wastewater Network
Wastewater Network (New) - Ballyvolane Pumping Station, Cork
Rathmichael/Shankill Wastewater Network
Wastewater Network (Upgrade) - Loughrea
Local Network Reinforcement Project - Newcastle
Castletown Wastewater Pumping Station and Rising Main Upgrade
Nenagh Multi Utility Project
Wexford Town Distillary Road Pumping Station Upgrade - Wastewater Network
Local Network Reinforcement Project - Drogheda
Midleton Wastewater Transfer Project
Wastewater Network (Upgrade) - Carrigtwohill, Cork
Castlecomer, Urlingford and Stoneyford Wastewater Treatment Plant Upgrades
Waterford City WWPS (Ferrybank)
Local Network Reinforcement Project - Landscape Road
Local Network Reinforcement Project - Johnstown Road
Lismore Wastewater Network Upgrade
Wastewater Network (Upgrade) - Ballinasloe
Kinvara Sewerage Scheme - Network
Waterford City Sewerage Scheme - Contract 2
Network Extensions (Wastewater) - Western Environs Development
Wastewater Network (Upgrade) - St. Johnston

www.gov.ie/RBMP

Department of Housing,
Local Government and Heritage

Rialtas na hÉireann
Government of Ireland

THIRD CYCLE RIVER BASIN MANAGEMENT PLAN 2022-2027

SEA Statement



MDR1665
F01
July 2024

Contents

1 INTRODUCTION 1

2 SUMMARY OF KEY FACTS 2

3 SUMMARY OF THE SEA PROCESS 3
3.1 Introduction 3
3.2 Screening 3
3.3 Scoping and Statutory Consultation 3
3.4 Environmental Assessment and Environmental Report 3
3.4.1 Summary of Assessment 4
3.4.2 Statutory Consultation on the Draft Plan 13
3.5 SEA Statement 13
3.6 Appropriate Assessment 14

4 INFLUENCE OF THE SEA PROCESS ON THE RBMP 15
4.1 Integration of the SEA Process 15
4.2 Recommended Mitigation Measures and how they have been addressed in the Final RBMP 16

5 HOW CONSULTATION FEEDBACK HAS INFLUENCED THE RBMP 41
5.1 Consultation Under Article 14 of the Water Framework Directive 41
5.2 Consultation Under Article 9 of the Strategic Environmental Assessment Directive 41
5.2.1 Consultation Feedback on the SEA and AA Documents and Processes 43
5.3 Assessment of Final Changes to the Draft RBMP post-Consultation 46
5.3.1 The Importance of Protecting our Natural Waters 47
5.3.2 The Status of Ireland's Water Bodies 48
5.3.3 Setting Environmental Objectives 49
5.3.4 Measures Required 52
5.3.5 Programme of Measures to 2027 52
5.3.6 Implementation and Governance 95
5.3.7 Public and Stakeholder Engagement 101
5.3.8 Economic Analysis of Water Use 101

6 PREFERRED SCENARIO AND REASONS FOR CHOOSING THE FINAL PLAN 106
6.1 Introduction 106
6.2 Approach to Alternatives for the Draft RBMP 106
6.3 Assessment Parameters 108
6.4 Strategic Alternatives 108
6.4.1 Strategic 108
6.4.2 Effects Orientated 110
6.5 Overall Preferred Alternative 114

7 MEASURES TO MONITOR SIGNIFICANT ENVIRONMENTAL EFFECTS OF THE IMPLEMENTATION OF THE ADOPTED RBMP 115
7.1 Introduction 115
7.2 Responsibility for Monitoring 115

8 ADDENDUM TO THE ENVIRONMENTAL REPORT 118
8.1 Chapter 4 Review of Relevant Policies, Plans and Programmes 118
8.2 Chapter 5 Relevant Aspects of the Current State of the Environment 119
8.3 Chapter 7 Alternatives 121
7.3.1 Alternatives Considered in the Second Cycle of the RBMP 121
8.4 Appendix A of the SEA Environmental Report 121

Tables

Table 3-1: Strategic Environmental Objectives 4
Table 3-2: Summary of Draft Plan Measures and Assessment 6
Table 4-1: How Environmental Considerations Have Been Taken into Account in the RBMP.....15
Table 4-2: SEA Mitigation Measures in the Environmental Report 17
Table 4-3: AA Mitigation Measures in the Natura Impact Statement 30
Table 5-1: Issues Raised in relation to SEA.....43
Table 6-1: Alternatives proposed for consideration in the SEA Scoping Report.....106
Table 6-2: Alternatives proposed in the Scoping Report.....108
Table 7-1: SEA Environmental Monitoring Programme 116

Figures

Figure 6.1: Criteria for Alternatives and Categories Considered [Source: EPA Guidance, 2015] 107

Appendices

Appendix 1: Record of Public Participation, Consultations and Social & Digital Media Analytics

Appendix 2: Consultation Summary Report

1 INTRODUCTION

The Department of Housing, Local Government and Heritage (DHLGH) has prepared Ireland's 3rd Cycle River Basin Management Plan (hereafter referred to as the "RBMP" or "the Plan"). It sets out the objectives and recommendations to be pursued until 2027 and beyond in order to improve the management of water in Ireland and to achieve the objectives of the Water Framework Directive (WFD); taking into account the progress made over the first and second cycle plan as well as changes that have occurred since the previous plan was published in 2018.

This Strategic Environmental Assessment (SEA) Statement has been prepared as part of the SEA of the RBMP. It has been prepared in accordance with Article 8 (Decision Making) of EU Directive 2001/42/EC on Strategic Environmental Assessment; Article 16(2) of the European Communities (Environmental Assessment of Certain Plans and Programmes) Regulations (S.I. No. 435 of 2004) as amended; and Circular Letter PL 9/2013, Department of Environment, Community and Local Government.

This document provides information on the decision-making process and documents how environmental considerations, the views of consultees/ stakeholders and the recommendations of the SEA Environmental Report have influenced the final Plan to be adopted.

The structure of the SEA Statement is as follows:

1. Introduction;
2. Summary of Key Facts;
3. Summary of the SEA Process;
4. Influence of the SEA Process on the RBMP;
5. How Consultation Feedback has influenced the RBMP;
6. Preferred scenario and reasons for choosing the final Plan;
7. Measures to monitor significant environmental effects of the implementation of the adopted RBMP; and
8. Addendum to the Environmental Report.

2 SUMMARY OF KEY FACTS

Title of Plan:	**The title of the plan has been revised to: Water Action Plan 2024. A River Basin Management Plan for Ireland.**
Purpose of Plan:	The RBMP sets out measures that are necessary to protect and restore water quality in Ireland.
Competent Authority:	Department of Housing, Planning and Local Government
Period Covered:	The RBMP will cover the period up to 2027.
Area Covered:	Ireland's river basin management planning process is based on a single national River Basin District that also incorporates two international River Basin Districts, the North Western and the Neagh Bann, which are shared with Northern Ireland.
Nature and Content of the Plan:	This RBMP builds on the achievements in the second cycle, in particular: 1. Introduction of new governance and implementation structures; 2. Establishment of Irish Water, An Fóram Uisce, the Local Authority Waters Programme (LAWPRO) and the Agricultural Sustainability Support and Advisory Programme (ASSAP); 3. Initiation of research programmes led by the Institute of Public Administration (IPA) in relation to water governance and the Economic and Social Research Institute (ESRI) in relation to the impact of river basin management strategies on human attitudes and behaviours; This RBMP focusses on "the right measure, in the right place" supported by an increased level of ambition; application of the principles of integrated catchment planning; measures providing multiple benefits; and improved role clarity and collaborative implementation. The RBMP articulates a set of new targeted and effective measures in addition to the existing measures to be implemented by the EPA, governmental departments, regional and local authorities, as well as other agencies and authorities. It makes recommendations for actions in relation to society and environment along with economic analysis.
Main Contact:	Water Advisory Unit, Department of Housing Local Government and Heritage Custom House, Dublin 1, D01 W6X0

3 SUMMARY OF THE SEA PROCESS

3.1 Introduction

The 3rd cycle RBMP has been subject to a process of SEA, as required under S.I. No. 435 of 2004, as amended by S.I. No. 200 of 2011. This has included the key steps described in the following sections.

3.2 Screening

Screening of the 3rd cycle RBMP for SEA was undertaken by DHLGH. It was determined that SEA was required for the 3rd cycle RBMP for the following reasons:

- The RBMP is subject to preparation and adoption by an authority;
- It is required by national legislative provision;
- The plan address water quality and water management issues;
- It is intended that the plan would set the framework for future development consent of projects listed in the EIA Directive.

Furthermore, a Natura Impact Statement has been prepared to inform the Appropriate Assessment of the 3rd cycle RBMP under the Article 6(3) of the EU Habitats Directive (92/43/EEC), as transposed into Irish law by the European Communities (Birds and Natural Habitats) Regulations 2011 (S.I. 477/2011), as amended.

3.3 Scoping and Statutory Consultation

Scoping was carried out to establish the level of detail appropriate for the SEA Environmental Report. An SEA Scoping Report was prepared and sent to the statutory consultees on 13th April 2021, to be used as the basis for statutory consultations. The statutory consultations were undertaken with the environmental authorities for SEA in Ireland as outlined below. In addition, informal transboundary consultation was undertaken at scoping stage with the SEA consultee for Northern Ireland.

- Department of Housing, Local Government and Heritage (DHLGH) - Forward Planning Section and Development Applications Unit;
- Department of Environment, Climate and Communications (DECC);
- Department of Agriculture, Food and the Marine (DAFM);
- Environmental Protection Agency (EPA);and
- Department of Agriculture, Environment and Rural Affairs (Northern Ireland).

Scoping submissions were received from Inland Fisheries Ireland (IFI) which is a State Agency operating under DECC, DAFM, EPA and DAERA. These submissions were taken into account in the preparation of the Environmental Report. All the environmental topics listed in the SEA Directive were considered and all were scoped in for the purposes of the assessment. Consultation is discussed in more detail in **Chapter 5**.

3.4 Environmental Assessment and Environmental Report

The preparation of an Environmental Report on the likely significant effects on the environment of implementation of the RBMP included consideration of:

- The relevant aspects of the current state of the environment and its evolution in the absence of the plan;
- The environmental characteristics of areas likely to be significantly affected and existing environmental problems relevant to the plan
- Links between the RBMP and other relevant strategies, policies, plans, programmes and environmental protection objectives;
- The likely significant effects of the RBMP on the environment (both positive and negative);
- Measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment;
- An outline of the reasons for selecting the alternatives chosen; and
- The measures envisaged concerning monitoring.

3.4.1 Summary of Assessment

The approach used for the assessment of the draft 3rd cycle RBMP in the SEA was termed an "objectives-led assessment" using the Strategic Environmental Objectives (SEO) are set out in **The assessment** was carried out also having regard to the current state of the environment and changes to water quality experienced over the implementation period for the 2nd cycle Plan.

Table 3-1**.** The assessment was carried out also having regard to the current state of the environment and changes to water quality experienced over the implementation period for the 2nd cycle Plan.

Table 3-1: Strategic Environmental Objectives

SEA Topic	SEA Objective	Assessment Criteria (to what extent will the RBMP…)	Relevant UN SDG
Population and Human Health (PHH)	• To support sustainable use of water resources and to protect human health.	• Ensure the quality standards for bathing waters can be achieved • Ensure the quality standards for UWW can be achieved • Ensure the quality standards for water quality in shellfish water can be achieved • Promote access to the water resource for tourism and recreation. • Complement and integrate with other government policy	
Biodiversity Flora and Fauna (BFF)	• To preserve, protect, maintain, and where appropriate restore the terrestrial, aquatic, and soil biodiversity, particularly EU designated sites, priority species and their habitats and protected species, and integrate biodiversity considerations wherever possible into the RBMP. • To protect and conserve ecological corridors and linkages adjacent to designated habitats. • To support the delivery of green and blue infrastructure and sustainable urban development	• Improve environmental protection and contribute to achieving environmental protection objectives under the WFD, Habitats Directive and the Birds Directive • Safeguard aquatic ecosystems and safeguard space for the natural water environment to enable continued provision of ecosystem goods and services and taking opportunities to enhance same • Avoid, minimise or mitigate disturbance impacts on mobile aquatic species • Preserve, protect, maintain and / or restore protected areas and ensure integrity of the network is not impacted • Protect and conserve ecological corridors	

SEA Topic	SEA Objective	Assessment Criteria (to what extent will the RBMP…)	Relevant UN SDG
	schemes to offer multiple benefits for biodiversity, water, population and human health.	• Contribute to integrated climate biodiversity, soil and water benefits	
Land and Soils (LS)	• To safeguard soil quality and quantity.	• Prevent loss of soils; • Ensure the control of impacts from sewage and agricultural sludges • Ensure the ecosystem services of soils in terms of drainage, water quality, carbon sinks are not compromised	
Water (W)	• To protect, restore and enhance water quality (surface waters, groundwaters and marine waters). • To improve the efficacy of existing legislation and ensure its implementation in full, to regulate point source discharges, abstractions and activities impacting on hydro-morphology.	• Contribute to achieving the objectives under the WFD within the plan period; • Reduce nutrient pollution from land based activities; • Strengthen the implementation of existing water quality and environmental assessment legislation • Integrate with the Floods and Marine Strategy Framework Directives	
Air Quality (AQ)	• Maintain and improve air quality and reduce emissions of specified air pollutants to protect human health and the environment [EPA SoE 2020]	• Minimise emissions to air as a result of plan activities and maintain and promote continuing improvement in air quality as appropriate to the plan	
Climatic Factors (CF)	• To contribute to a climate resilient water sector • To support and promote water conservation • To reduce greenhouse gas emissions, improve energy efficiency and renewable energy, assess and manage adaptation to climate change [EPA SoE 2020]	• Contribute to adaptation to climate change • To reduce the environmental, social and economic risks of climate change by reducing (net) vulnerability and/or improve resilience to climate.	
Material Assets (MA)	• To support and promote the sustainable use of the water resource without conflicting with other environmental protection objectives.	• Achieve transition to a competitive, low-carbon, climate-resilient and environmentally sustainable economy by 2050 • Support development of sustainable water use e.g., water conservation. • Ensure the sustainable use of pesticides and fertilisers • Reduce the risk of hazardous material interacting with waterbodies	
Cultural Heritage (CH)	• To conserve, protect and enhance places, features, buildings and landscapes of cultural, historical archaeological or architectural heritage.	• Protect places, features, buildings and landscapes of cultural, archaeological or architectural heritage • Protect the site and setting of water based historic environment features	
Landscape (LandS)	• To protect landscape character and visual amenity.	• Ensure that the value and special qualities of landscapes (including river-scapes) are protected	

SEA STATEMENT

The primary intended effect of the RBMP is to improve the quality of water bodies with a focus on sustainable management of natural waters and protection of freshwater resources. It aims to improve how regulation and collaboration work together to deliver significant environmental improvements. The assessment is summarised in Table 3-2

Table 3-2: Summary of Draft Plan Measures and Assessment

Draft Plan Chapter Ref.	Summary of Draft Plan Measures and Assessment	Mitigation?
Chapter 2 Ireland's River Basin		
Section 2.2 Shared River Basins with Northern Ireland	The measures relate to the development of a 'shared waters' document in cooperation with the relevant agencies in Northern Ireland to outline the water bodies shared between jurisdictions and what measures are needed to ensure they meet their environmental objectives. This is broadly positive, particularly in light of Brexit as it takes an integrated approach to management. Precautionary SEA and AA screening of shared waters document suggested.	✓
Section 2.4 What we want to achieve	These measures relate to: templates for catchment management plans; reviewing local authority resources in terms of water quality protection/restoration; review progress on the RBMP implementation and looking at the feasibility of setting up an interdepartmental group to review progress on measures in terms of the Programme for Government's Water, Climate and Biodiversity objectives; Irish water to review its Water Services Strategic Plan; DHLGH and the Dept. of Rural and Community Development to develop a Rural Water Services Strategic Plan; Irish Water to implement mitigation measures for abstractions which are a pressure; a review of the need for exemptions for abstractions; and establishing a multi-agency group to coordinate efforts in implementing nature-based catchment management. Many of the measures are broadly positive, particularly for W and MA in terms of the review processes and coordinating groups being established and continued, and nature-based solution approaches, which also has positive effects for BFF, LS, CF/AQ and LandS. There is a lack of clarity on some measures, such as the level of detail to be contained in the catchment management plans, and the responsibilities for implementing the measures under the specific sectoral pressures. There is potential for negative environmental effects around the lack of timelines in terms of the mitigations/exemptions around abstractions. Reiterating the need for SEA and AA screening of related plans noted.	✓
Section 2.5 Other Plans and Programmes	The two measures relate to strengthening sector water protection measures (in particular: water services, spatial planning, agriculture and aquaculture), and embedding measures in sectors that can deliver on multiple environmental policy objectives (water, biodiversity and climate adaptation). Ensuring consistent policy integration between the RBMP and other national policy is perhaps one of the biggest risks to the success of the RBMP in achieving compliance with the WFD. These measures provide a statement of intent, but more context and specific actions are needed on how these can be achieved. The achievement of such alignment would be positive in the longer term. The need for clarity on the integration across sectoral plans noted.	✓
Chapter 3 Our Water Resources		
Section 3.1 The Current Condition of our Waters	The measure under this section relates to gathering additional evidence to determine if certain water bodies are at risk i.e., those water bodies which have little to no information on whether significant pressures are present or where more baseline data is needed to decide on the risk of not meeting environmental objectives. As the measure is focused on improving the evidence base, it will have long term positive effects on environmental receptors	✗
Section 3.3 Artificial and Heavily Modified Water Bodies	This measure will involve undertaking a technical review and public consultation on the designation of Heavily Modified Water Bodies. This measure is a review exercise and so will have indirect positive impacts for W in the medium to long term, as redesignation of some water bodies to heavily modified status may occur would better reflect the hydromorphological character of those water bodies. However, a redesignation of a significant number of water bodies to heavily modified has indirect negative aspects for BFF, W, LS and LandS in that it represents a net loss of natural capital due to human activities.	✗
Section 3.4	The measures relate to carrying out a 'climate check' on the draft RBMP's	✓

Draft Plan Chapter Ref.	Summary of Draft Plan Measures and Assessment	Mitigation?
Impacts of Climate Change	measures; updates to the Climate Adaptation Plan for the Water Quality and Water Infrastructure Sectors; examining opportunities in the RBMP's monitoring programme to improve the understanding of climate change trends; and to support additional research and pilot projects in the area of climate change. The climate check approach should have positive impacts on CF, W and MA and indirect positive impacts on BFF, PHH and LS. The review and update process for the Climate Adaptation Plan will allow for a new evidence base to be developed as well as monitoring to feed into actions necessary for the next plan cycle, which also has positive effects. Additional research and monitoring in the area of climate change is generally considered positive and will benefit climate adaptation and water management directly in the long-term, with indirect positive benefits for BFF, LS, PHH and MA in particular. However, the actions are somewhat vague and are at a similar scale to the general statement in the Climate Adaptation Plan. A gap analysis or prioritisation of issues to inform such actions would be required to properly focus funding and resources.	
Chapter 4 Implementation of Second Cycle Plan		
Section 4.3 Continuing Monitoring, Evaluation and Review	These measures concern progressing further studies under an ESRI research programme; reviewing resource needs of LAWPRO and wider local authority structures; reviewing the outcomes of the IPA Governance Research Programme which looks at Ireland's water governance arrangements; and to carry out a review of the Agricultural Sustainability Support and Advisory Programme (ASSAP) and recommendations for the 3rd Cycle RBMP. These measures are considered positive, principally for W, MA and PHH. Continued research will contribute to the knowledge base in the short and longer term depending on when the insights can be synthesised and acted upon). Reviews of the LAWPRO and wider public services structures, as well as ASSAP, are directly positive as it recognises that resources, training, funding, and clear roles/objectives are all required to support effective implementation of the RBMP/WFD.	✓
Chapter 5 Programme of Measures – How we Protect and Restore Water		
Section 5.2 Protection of Waterbodies	The measure will comprise the establishment of a working group to review current legislative provisions for activities which are posing a risk to water bodies, and opportunities to improve compliance with it. Improved understanding of blockages or challenges with regard to the efficacy of current legislation will improve compliance; this will have positive impacts for W and MA in the short to longer term and is deemed likely to result in better outcomes overall for RBMP implementation. A mid-term review should be conducted to assess progress on implementing the identified options for improving WFD compliance.	✓
Structural / Societal Measures		
Section 5.3 Structural and Societal Measures **Sub-section 5.3.1 Implementation/ Governance**	These measures relate to implementation and governance approaches for the 3rd cycle plan. Research into implementation arrangements and lessons-learned from the 2nd Cycle plan means there will a shift in focus from information sharing to more focus on high-level policy direction, monitoring and reporting on implementation of the plan, as well as a greater emphasis on compliance assurance activity. The implementation measures will also put in place a capacity building programme, as well as further development and support of local initiatives (such as river trusts/ catchment partnerships). Overall, these measures are considered to be directly positive for W and MA as well as PHH in the medium to long term, as they are anticipated to lead to better tracking of progress towards RBMP outcomes. Capacity-building is broadly positive particularly for PHH, W and MA as this measure relates to knowledge transfer and sharing, and there are currently many groups and cross-linkages/synergies across the various levels of governance. However, some of the groups involved in monitoring and evaluation of the plan have not developed this role in a formal way. Further activation and development of community projects is very positive for PHH, W and MA in particular when realised over the longer term, as it will allow these activities to progress and further enable stakeholder engagement. An environmental risk assessment approach is recommended to inform decision-making, along with awareness training for wider impact pathways at local level.	✓
Section 5.3 Structural and Societal Measures	LAWPRO will also prioritise their work in a number of Areas for Action, which is positive and will ensure limited resources are targeted efficiently. A detailed work plan will also be drawn up for the Blue Dot Programme which targets the highest	✓

Draft Plan Chapter Ref.	Summary of Draft Plan Measures and Assessment	Mitigation?
Sub-section 5.3.2 Areas for Action	quality monitored sites in Ireland, the number of which were decreasing over the last number of decades, and only recently showing a positive reversal of this trend. This measure is expected to yield positive impacts over the longer term, acknowledging that it can take a number of years for improvements to be realised. While the measures overall are expected to be positive, the assessment notes the need for consideration of other environmental receptors besides W and BFF, such as CH and LandS and the need for a detailed work plan to track progress.	
Section 5.3 Structural and Societal Measures **Sub-section 5.3.3 Public Participation**	The measures are designed to enhance the progress made to date on stakeholder engagement and to further mainstream integrated catchment management into individual and community-led initiatives and to expand funding/supports for these. As such they are broadly positive for environmental receptors, with positive effects predicted for PHH, W, BFF and MA through better engagement, identification of locally important issues (including natural and built heritage associated with river systems), as well as community investment in long term sustainable solutions. Indirect positive effects are also possible for BFF, MA, CH, LandS where co-benefits can be identified for protection, restoration and integration of other natural and built heritage with catchment management activities. The need for upskilling of local communities in wider impact pathways is noted as is the need for indicators of effectiveness to properly establish the co-benefits for actions.	✓
Environmental Measures		
Section 5.4 Environmental Measures **Sub-section 5.4.1 Agriculture**	The Agriculture measures cover the Good Agricultural Practice Regulations and the new Nitrates Action Programme (NAP) which is in preparation, new Rural Development Programme Regulations under the national Common Agricultural Policy Strategic Plan, development of farm sustainability plans/online planning tools, new authorisation systems for in-stream works, and expansion of the Local Authority Waters Programme (LAWPRO) and the Agricultural Sustainability Support and Advice Programme (ASSAP). The establishment of tighter controls, as well as providing for enhanced expansion of and programmes of enforcement by Local Authorities etc. is broadly positive, but efficacy is currently limited due to a lack of resources. If funded and implemented correctly these measures could be expected to have a medium to long term direct positive on W, LS, BFF, PHH, MA and CF. The measures also include compliance assurance and enforcement actions for agricultural activities, with a focus on targeted inspections and critical source areas for pressures, which ensures efficient use of limited resources. As such, medium to long term broadly positive impacts can be expected for environmental receptors, noting potential negative impacts where actions might lead to additional costs for farmers. However, reductions in the nutrient application requirements for instance could lead to positive benefits. It is acknowledged that agriculture is the dominant land use in Ireland, and also comprises the most common significant pressure affecting water bodies that are not meeting their WFD objectives. The concern with some of these measures is that there is currently plenty of guidance, regulations and tools available to tackle agricultural pressures, but there needs to be better implementation on the ground and for authorities working with farmers to ensure there is adequate resourcing to allow for this, and consistent training and application of new guidance/regulations, as well as ensuring accessibility to this toolkit of knowledge for all farmers. The need for lower tier assessments and training is noted.	✓
Section 5.4 Environmental Measures **Sub-section 5.4.2 Natural Rivers and Lakes and River Restoration - Hydromorphology**	The Hydromorphology measures are looking at establishing: a new regime for Controlled Activities for the Protection of Waters; a national restoration programme looking to mitigate the negative impact of past construction in or near water bodies; a pilot scheme at the Annacotty Weir in the Mulkear Catchment to assist in designing/implementing the restoration programme; and overseeing the implementation of a roadmap of actions to improve fish migration in the lower Shannon at the Hydroelectric scheme located around Parteen and Ardnacrusha. Establishing a new controlled activities regime, expert group is broadly neutral to positive across for environmental objectives, with positive benefits arising in the longer term as it will take time to establish this group, repeal older legislation, and develop/rollout new recommendations. There may be some negative aspects for MA insofar as new regulatory regimes may have implications for current hydromorphological-related activities, or where other agencies/state bodies may	✓

Draft Plan Chapter Ref.	Summary of Draft Plan Measures and Assessment	Mitigation?
	have to align their activities with the new regime. Under the national restoration programme, which would involve modifying or removing barriers to fish migration, has positive aspects for BFF, specifically fish, and also W, as barriers are often a reason for the fish status element to fail in terms of WFD ecological status. There are however implications on the wider environment; there is potential for negative effects on BFF and LS in terms of how this programme might affect other biological quality elements or water dependent species (e.g., otter). Barrier modification/ removal may result in for instance eroded river banks further downstream or modified hydrodynamic conditions. There are also potential long term negative implications for CF should the flood regime be significantly altered, or flood risk is increased elsewhere. Some barriers may have cultural heritage value, so there are potential for negative effects on CH and LandS. It is noted that hydromorphological modification has emerged in Ireland as being the second most common significant pressure on surface water bodies. Overall, it is acknowledged that while the measures for hydromorphology are broadly positive, much of the focus is on barriers, which is an important aspect but mainly from the perspective of fish status. This is one of many biological quality elements which together contribute to overall WFD ecological status. The measures are considered to not address far enough the main hydromorphological impacts which comprise channelisation and land drainage, which have broader and significant implications for overall ecological health. Recognition of the need for risk assessment approach for wider environmental impacts is noted.	
Section 5.4 Environmental Measures **Sub-section 5.4.3 Forestry**	The measures include: continuing to seek improvements to the licensing process for forestry activities; increasing the implementation of water setbacks and other water protection measures; managing applications of support measures which are water-protection focused under various forest schemes (e.g. Native Woodland Conservation Scheme); to encourage uptake of the Woodland Creation on Public Lands Scheme; rollout of the Woodland for Water Scheme; continue to address forestry-related water incidents; further engagement between DAFM and other parties on forestry matters; and to deliver further training to Registered Foresters and Consultant Ecologists etc. in the context of environmental protection in forestry projects. The measures are considered to have broadly positive effects on environmental receptors, particularly LS, W and indirectly for BFF such as the setback distances and various woodland schemes, and where a nuanced approach is taken in the context of the habitat and species sensitivities in target areas. Clearfelling operations and associated infrastructure such as road construction however can have significant negative effects on BFF and W. In terms of the measure managing the application of support measures that have a clear application in relation to the protection of water, the exact actions are not specified and requires some clarity. Similarly, the measure on tackling forestry-related water incidents is somewhat vague in terms of details of what this entails, however is also broadly positive should it lead to positive outcomes for BFF, W and LS. The measures on further engagement by the various parties involved in forestry activities, as well as roll-out of further training for those specialists working on forestry projects is welcomed. Requirement to look at conservation forestry and changes to legislation noted.	✓
Section 5.4 Environmental Measures **Sub-section 5.4.4 Urban Waste Water**	These measures comprise: continued investment in wastewater treatment plants through the Irish Water programme; addressing improvements in treatment for the Priority Areas for Action and investment in unsewered areas; ensure compliance with the Urban Wastewater Treatment Directive (UWWTD); review of discharge licences and update of the Nutrient Sensitive Area designations; negotiating the recast UWWT Directive and transposing into Irish law; developing new standards for sewer overflows; conduct research and a gap analysis, establishment of an inter-departmental group, and evaluation of options for EU funding. Broadly the measures direct positive impacts on PHH, BFF, W and MA, as effective treatment and management of wastewater is critical in order to protect human health and the receiving environment. As with any infrastructure upgrade works or construction of new facilities/supporting infrastructure, there is potential for direct and indirect impacts on the wider environment in the short to medium term on BFF, LS, W, CH, LandS and AQ/CF, should there be a loss of greenfield land or development in an area with environmental sensitivities, and from temporary construction-related impacts. The measures related to research, financing and gap analysis etc. are considered to be broadly neutral to positive	✓

Draft Plan Chapter Ref.	Summary of Draft Plan Measures and Assessment	Mitigation?
	across environmental objectives. The assessment notes that the carrying capacity of the receiving environment needs to be established where European sites are in proximity to wastewater facilities. Continued compliance with the UWWTD and WFD as agglomeration populations grow is also flagged.	
Section 5.4 Environmental Measures **Sub-section 5.4.5 Urban Runoff**	The measure for urban pressures covers the need for technical guidance for implementing nature-based solutions (NbS) in sustainable urban drainage systems (SuDS) and identifying resource/training gaps, as well as developing a national implementation strategy with interim guidance in advance of this; identifying shortcomings in legislation/policy for supporting WFD implementation; providing for coordination in terms of planning and land use policy; and identifying investment needs. The measures are broadly positive across environmental objectives, particularly the focus on SUDS and the NbS approach, which works with nature rather and offers opportunity for multiple environmental benefits for W, MA, BFF and LS, such as contributing to flood risk management and water quality. Indirect positive effects are anticipated for PHH, BFF, LS, W, AQ, CF, MA and LandS as these measures will result in application of NbS concepts in urban planning. All of the measures proposed recognise that further groundwork is required to efficiently deliver outcomes from the NbS approach, and is a positive step recognising that resources, training and funding are all required to support effective implementation.	✓
Section 5.4 Environmental Measures **Sub-section 5.4.6 Domestic Waste Water Discharges**	The measures for domestic wastewater treatment systems (DWWTS) relate to monitoring the uptake of new grant schemes and initiating a research project on behaviours/attitudes to assess levels of uptake; research into nature-based solutions (NbS) as an approach to sustainable DWWTS; and reviewing the inspection regime for DWWTS. Conducting research into sustainable domestic wastewater discharges is directly positive for LS and W in particular (especially groundwater), and such research could lead to valuable insights and inform future design practices. There would also indirect positive impacts for W and PHH. Monitoring uptake of grant schemes and examining reasons why people may not be availing of these through a research project is broadly neutral to positive. A review of the National Inspection DWWTS Plan would be positive across PHH, LS, W and MA; while DWWTS can operate effectively when installed under the correct conditions, problems can arise e.g., through inadequate percolation in certain soil types, which can pose a serious health risk. The requirements for upgrades to treatment systems would have some short term impacts for PHH and MA if new or upgraded infrastructure in needed. The use of NbS however will have longer term direct positive impacts for LS and W in particular, and indirectly positive for BFF and CF as it would represent a shift to more sustainable treatment systems.	✓
Section 5.4 Environmental Measures **Sub-section 5.4.7 Unknown Pressures**	The measures states that the significant pressures for 164 water bodies is still to be identified and that to address this data gap, assessments will be undertaken by both LAWPRO and local authorities. It is intended that the results of these assessments will inform what measures would be needed during the next period. It is noted that the majority of these water bodies (104) are within the Priority Areas for Action and will undergo targeted pressure-impact assessments by LAWPRO. The measure will have indirect positive effects in the short-medium term by improving the baseline to inform the most appropriate actions for these water bodies.	✗
Section 5.4 Environmental Measures **Sub-section 5.4.8 Other Pressures**	The pressures identified under the heading of 'other' include abstractions, aquaculture, atmospheric, historically polluted sites, invasive species, tourism, windfarms, golf courses, water treatment and waste. As these activities each impact a relatively small number of water bodies, they have been grouped together in the RBMP to be dealt with through the implementation of basic measures and on a case by case basis by the relevant responsible body. While actions to address pressures are anticipated to give rise to positive effects for W, in the absence of defined measures for these 'other' pressures there is potential for an uncoordinated response with limited opportunity for lessons learned and knowledge transfer where similar problems arise elsewhere within or outside defined RBMP Areas for Action. Several of the aspects listed under the pressure category of "other" have potential to become issues into the longer-term. There is currently insufficient information to carry out an assessment.	✓
Section 5.4	The Peat measures include a review of the National Peatlands Strategy;	✓

Draft Plan Chapter Ref.	Summary of Draft Plan Measures and Assessment	Mitigation?
Environmental Measures **Sub-section 5.4.9 Peat**	overseeing/ implementing various LIFE Integrated Projects (IP), which are EU projects that support 'Environment, Nature Conservation and Climate Action'; continuing to implement the various programmes to restore the raised bog SAC/NHA network; implementing the actions of the CANN and CABB projects (transboundary collaboration); looking into the causes of blanket bog landslides; implementation of three European Innovation Partnership (EIP) projects for sustainable farming in upland areas; and exploring financial options to continue rollout of peat restoration efforts. The mid-term review of the National Peatlands Strategy is considered to be positive, particularly in relation to PHH, W, BFF, LS, MA and CH, as it will allow an audit of progress and efficiency of the measures and allow an opportunity for refinement and further alignment with latest evidence base and prioritisation; the review must focus also on the effectiveness of its measures. Two EU LIFE IP funds have been secured to bring forward the *Wild Atlantic Nature* and *Peatlands and People* projects, and three EIP projects are underway; these are expected to have direct positive impacts in the medium to long term for W, BFF, LS as a result of reducing the pressures in the catchments concerned. BFF will benefit from rehabilitation and restoration of bog habitat and improved quality of habitats to support key dependant species. Ecosystem services are also likely to improve with the restoration efforts with positive, and in particular long term, effects from climate, flood mitigation, water filtration etc. on CF, AQ, BFF, PHH, LS and LandS, among others, with indirect positive effects for PHH, MA and CH a just transition. Indirect negative effects are possible under both projects where wider BFF is affected by charges in existing drainage and habitats, and also for MA and CH where traditional peat harvesting/ turf cutting is lost. Examining the reasons for bog landslides is positive as it will contribute to the knowledge base on this topic and inform the key risk factors. Mitigation of ammonia from cutaway peatlands needs to be included.	
Section 5.4 Environmental Measures **Sub-section 5.4.10 Industry, Mines and Quarries**	The measures include setting up a group under the National Technical Implementation Group to examine the implementation of current legislation governing activities which pose a risk to waters and to identify opportunities to improve compliance with it. This is welcomed and would be expected to give rise to short to medium term benefits for all environmental receptors where enforcement of existing requirements is strengthened, particularly with regard to issues of compliance under the WFD but also the Birds and Habitats Directive. DHLGH will also examine opportunities to support businesses in taking on water stewardship approaches, which is broadly positive as a move from a purely regulatory approach is necessary in the long term for a sustainable approach to water management.	✓
Section 5.4 Environmental Measures **Sub-section 5.4.11 Drinking Water Source Protection**	The drinking water measure relates to developing legislative and administrative structures to transpose the recast EU Drinking Water Directive, which will include a risk-based approach to managing water supply catchments as well as defining responsibilities. The protection of drinking water sources is now a specified requirement under the revised directive. The measure is broadly neutral to positive across environmental objectives, with longer term direct positive impacts on W, PHH and MA, and indirect positive impacts on LS via protection of the surface-groundwater interaction. Establishing legislation, assigning responsibilities for tasks, and stakeholder communications through the established Drinking Water Expert Group are broadly positive for W, MA, PHH and LS as the overall aim is for better management activities in order to contribute to protection of drinking water supplies. While the majority of drinking water supplies are of good quality in Ireland, there are ongoing issues in some supplies with the presence of e.g., fertilisers, pesticides and coliforms.	✓
Section 5.4 Environmental Measures **Sub-section 5.4.12 Invasive Alien Species**	The measures comprise implementation of the new EU Invasive Alien Species (IAS) Regulation; development of management plans and priority actions; stakeholder engagement and supporting local projects; recruitment of more biodiversity officers and increased funding for community projects. IAS has emerged as one of the key challenges facing EU biodiversity as well as presenting serious social and economic challenges. The measures are broadly positive, particularly for BFF, W and LS. Positive impacts are also anticipated for PHH, CH and LandS as the measures all seek to control IAS and increase resourcing and funding. This is particularly important in the context of climate change as IAS may spread more aggressively and compete more effectively with the effects of climate change as ecological niches and envelopes change. It is	✓

Draft Plan Chapter Ref.	Summary of Draft Plan Measures and Assessment	Mitigation?
	noted that the measures are similar to those presented in the 2nd cycle plan and as such the effectiveness of rollout of the measures will need to be a significant aspect of the 3rd cycle PoMs.	
Section 5.4 Environmental Measures **Sub-section 5.4.13 Hazardous Chemicals in the Aquatic Environment**	The measures related to hazardous chemicals relate to: inputting into the EU work to revise the list of Priority Substances and Priority Hazardous Substances (which comprise certain heavy metals, pesticides etc.); amending the Environmental Quality Standards (EQS) Regulations for priority and hazardous substances, as well as revised EQS for shellfish waters; supporting the work of the National Pesticides and Drinking Water Action Group (NAECG), including the scoping study on river basin-specific pollutants and the study into investigating candidate substances as assigning EQS if needed. The measures are generally positive across environmental objectives, and PHH, W, BFF and LS in particular, as the aim of these measures is to ensure that chemical monitoring continues and takes account of emerging issues so that both environmental and human health is protected. Amending the EQS Regulations and the scoping studies will have direct positive impacts on PHH, BFF and W in particular, as this will have important implications for water quality monitoring going forward and responds to the wider issue of the quantity and diversity of chemical substances which are ending up in the water environment. Supporting the NAECG will have positive impacts on PHH, W and BFF in particular as well as LS as it can be expected that supporting actions to reduce and regulate pesticide use will also lead to a decrease in hazardous chemicals building up in lake and river sediments. The measures also support knowledge sharing which in the medium to long term should lead to better access to data and information and improve the knowledge base for water chemistry.	✗
Section 5.4 Environmental Measures **Sub-section 5.4.14 Aquaculture**	The Aquaculture measures relate to the launch of a licensing map viewer and improving access and links to licensing information; examining options to strengthen the licensing process with WFD considerations; reviewing quality standards for shellfish and the convening of a national expert group; establishment of a new management framework, including legislation and regulations, to allow for further designation and protection of shellfish waters; and consideration of shellfish waters as part of WFD risk and pressure characterisation. The measures seek to designate and protect shellfish waters into the future by introducing a new legislative and management framework in Ireland. Launching an online licensing map viewer is positive for PHH, W, BFF, LS and MA through improved overall understanding of baseline conditions; including the status of licences is also important. Improving the knowledge base through inclusion of shellfish waters as part of the WFD characterisation process would also be highly beneficial. Strengthening links between the licensing process and WFD is also positive and should lead to better alignment of policy and practice, however it lacks sufficient detail for; commitment to a Working Group and an outline of its terms of reference would form the basis for a more focused measure. A review of quality standards would be anticipated to give rise to long term positive effects for PHH, BFF, W, LS and MA, as would the drafting of primary and secondary legislation for shellfish waters, ensuring that appropriate water quality objectives have a legal basis and can contribute to the long term improvements. There is however a notable absence of reference to finfish in the measures presented and this should be addressed, as negative effects from and on finfish activity are also of relevance. Migratory fish species and other protected species in European sites with connectivity to aquaculture activity are not addressed in the measures for aquaculture, despite also being protected areas under the WFD.	✓
Section 5.4 Environmental Measures **Sub-section 5.4.15 Land Use Planning**	These measures relate to: the delivery of planning guidelines for local authorities in terms of River Basin Management Planning; developing a suite of other guidelines in the context of development management planning and preventing water quality deterioration/ supporting the delivery of the WFD, including the rollout of training to planning authorities. The measures relate to improving the integration between land use planning, WFD and RBMP objectives, and as such have potential for indirect medium to long term positive impacts, particularly for PHH, BFF, LS, W and MA as they will inform decision-making and provide processes and practices which can practically be applied throughout the forward planning and development management phases of land use planning. It is noted that additional supports are required in	✓

Draft Plan Chapter Ref.	Summary of Draft Plan Measures and Assessment	Mitigation?
	terms of personnel and budgets if guidelines are to be applied effectively by planning authorities. Indirect negative effects are anticipated in the medium to long term for MA where WFD considerations limit current land use potential, result in de-zoning or require additional costs to ensure protection of water quality for development. It is noted that the aim listed under measure for developing planning guidelines is to avoid unnecessary restrictions on sustainable growth and development and ensuring WFD requirements are proportionate to the plan level, risk, scale, nature and location of development. This has the potential for indirect negative effects on PHH, W, LS, BFF and MA as it introduces subjectivity into the decision-making process, where the sensitivity of the receiving environment and the nature of the activity is what must guide this.	
Section 5.5 Update and Review of Economic Analysis	These measures comprise the approach in Ireland to the recovery of costs for water services and the contribution made by the various water users to the recovery of water services, including: CRU will continue to assess and approve the costs and investment plans of Irish Water; Irish Water will publish a National Water Resources Plan and will maintain registers of water supply and wastewater capacity; excess use charges will continue to apply; compliance assurance activities will be enhanced for agricultural activities. The most effective combination of RBMP measures will also be examined prior to the draft RBMP's Programme of Measures being finalised. The measures are generally positive for PP, MA and W, with the assessment noting some negative effects for BFF, LS, CH, LandS where new infrastructure is required.	✓

***Key: PHH:** Population & Human Health; **BFF:** Biodiversity, Flora & Fauna; **LS:** Land & Soils; **W:** Water; **AQ:** Air Quality; **CF:** Climatic Factors; **MA:** Material Assets; **CH:** Cultural Heritage; **LandS:** Landscape*

3.4.2 Statutory Consultation on the Draft Plan

The draft RBMP was published for consultation on 27th September 2021 alongside the SEA Environmental Report and the Natura Impact Statement (NIS). All documents were available for inspection and download online[1]. See further details in **Section 5.3**.

3.5 SEA Statement

In accordance with Article 16 of S.I. 435 of 2004, as amended, the Competent Authority is required to prepare a statement, and this is the purpose of this document. This SEA summarises:

- How environmental considerations have been integrated into the plan or programmes, or modification to a plan or programme;
- How (i) the environmental report, prepared pursuant to article 12, (ii) submissions and observations made to the planning authority in response to a notice under article 13 and (iii) any consultations under article 14 have been taken into account during the preparation of the plan or programme;
- The reasons for choosing the plan or programme, in light of other reasonable alternatives dealt with, and
- The measures decided upon to monitor, in accordance with article 17, the significant environmental effects of implementation of the plan or programme.

The main purpose of this SEA Statement is to provide information on the decision-making process for the RBMP in order to illustrate how decisions were taken, making the process more transparent. In so doing, this SEA Statement records how the recommendations of both the Environmental Report and the Natura Impact Statement, as well as the views of the statutory consultees and other submissions received during

[1] DHLGH Consultation: gov.ie - Public Consultation on the draft River Basin Management Plan for Ireland 2022-2027 (www.gov.ie)

consultation have influenced the preparation of the final Plan. This SEA Statement also provides information on the arrangements put in place for monitoring.

3.6 Appropriate Assessment

In addition to the SEA, there is a requirement under the EU Habitats Directive (92/43/EEC) to carry out Appropriate Assessment (AA). The requirement for an assessment derives from Article 6 of the Directive, and in particular Article 6(3) which requires that:

> *"Any plan or project not directly connected with or necessary to the management of the site but likely to have a significant effect thereon, either individually or in combination with other plans or projects, shall be subject to appropriate assessment of its implications for the site in view of the site's conservation objectives. In the light of the conclusions of the assessment of the implications for the site and subject to the provisions of paragraph 4, the competent national authorities shall agree to the plan or project only after having ascertained that it will not adversely affect the integrity of the site concerned and, if appropriate, after having obtained the opinion of the general public."*

In recognition of this, an AA Screening was undertaken, and subsequently an NIS was prepared for the draft RBMP. Following consultation and updates to the draft RBMP, the NIS was also updated, and this was formally submitted to the Environmental Assessment Unit of the DHLGH in accordance with the requirements of S.I. 477 of 2011, as amended. Following a separate period of public consultation, the EAU made its determination. The formal determination is available under separate cover on www.gov.ie.

4 INFLUENCE OF THE SEA PROCESS ON THE RBMP

4.1 Integration of the SEA Process

The SEA process has been undertaken in parallel to the preparation of the RBMP. From the outset, considerations of the environmental consequences of implementing the RBMP (and its reasonable alternatives) have been taken into account. This included:

- Iterative discussions between the RBMP and SEA team to inform the SEA Scoping Report to understand and highlight key environmental issues;
- Iterative discussion and development of the alternatives to be considered;
- Advice and guidance on early versions of the proposed action base to highlight environmental risks;
- Evolution of RBMP recommendations/ actions;
- Recommendation of mitigation measures to address the potential impacts arising from the draft measures and subsequent detailed discussions on how to integrate this mitigation effectively;
- Attendance at an SEA monitoring workshop to discuss realistic and implementable monitoring actions;
- Discussions on integration of stakeholder observations and issues raised through statutory public consultation on the draft Plan.

Table 4-1 shows how environmental considerations and the input of the SEA and AA have been taken into account in the final RBMP.

Table 4-1: How Environmental Considerations Have Been Taken into Account in the RBMP

Environmental Consideration	Integration into the RBMP Process
Early discussion on policy formation	The SEA / AA teams engaged directly with the RBMP team at an early stage to raise issues and create awareness on key environmental constraints relating to plan alternatives and the action base.
Identification of environmental constraints	The SEA team prepared baseline information on environmental conditions with the focus on SEA environmental topics, including: population, human health, biodiversity, flora and fauna, water, climate, air, land and soil, landscape, cultural heritage, material assets and water. This information was used to focus the SEA objectives, inform the alternatives discussions and the assessment and assess positive and negative impacts associated with the implementation of the proposed RBMP. It also influenced the development of the SEA monitoring programme by flagging data gaps. GIS analysis and an Environmental Sensitivity Mapping (ESM) exercise were also undertaken to inform the baseline at a strategic level.
Assessment of alternatives	The environmental baseline and objectives were used to identify key sensitivities and inform development and assessment of the alternatives. The SEA team and the plan team liaised on possible alternatives during preparation of the SEA scoping document and subsequently through meetings and workshops.
Recommendation of mitigation measures to address impacts on the wider environment	Mitigation measures were proposed to address negative environmental impacts identified during the assessment process. These included amendments to the wording of recommendations/actions in the RBMP and recommendations for changes/ new actions to reflect protection of the environment.
Required environmental monitoring programme	A monitoring programme was presented in the SEA Environmental Report. This has been amended following statutory public consultation and further discussion with the plan team and will help facilitate the ongoing monitoring of the implementation of the RBMP.
Consultation	Statutory consultation was undertaken with the environmental authorities for SEA in Ireland in relation to scoping of the SEA Environmental Report. Informal transboundary consultation was also undertaken at that time with Northern Ireland. Issues raised were

Environmental Consideration	Integration into the RBMP Process
	used to inform the overall scope and context of the environmental assessment. Subsequently, the SEA Environmental Report, the AA Screening Information and a Natura Impact Statement were put on public display by the DHLGH on 27th September 2021 alongside the draft RBMP. Consultation was open for a 6 month period. Stakeholder feedback was reviewed and follow up meetings and discussions were held between the DHLGH and stakeholders to identify amendments to the draft Plan. Proposed changes arising from the written submissions and subsequent meetings were then assessed under the SEA and AA processes to determine if they would result in any additional significant environmental effects or result in adverse effects to any European site(s) prior to their inclusion and finalisation of the RBMP (see **Chapter 5**). The NIS relating to the final draft Plan proposed for adoption was submitted to the Environmental Assessment Unit of the DHLGH. This unit undertook an independent assessment of the NIS and also held an independent consultation over May and June of 2024. This consultation related solely to the NIS for the proposed plan and was to inform the Appropriate Assessment process.

4.2 Recommended Mitigation Measures and how they have been addressed in the Final RBMP

As part of the assessment of the draft RBMP, both the SEA Environmental Report and the NIS specifically suggested mitigation measures to offset negative impacts identified. These included general measures such as additional text clarifying obligations in relation to protection of European Sites, suggested inclusion of further guidance and studies to inform the evidence base, wording in actions, as well as specific recommendations and suggestions on how to improve the effectiveness of the plan going forward.

Table 4-2 and **Table 4-3** present the mitigation measures from the SEA Environmental Report and AA NIS carried out on the draft RBMP and provide the DHLGH response on how they have influenced the final RBMP.

Table 4-2: SEA Mitigation Measures in the Environmental Report

Section in RBMP	Proposed Mitigation	DHLGH Response on How these Have Been Addressed in the Final RBMP
Shared River Basins with Northern Ireland – Chapter 2, Section 2.2 of the draft RBMP	• **Action 2.2(1):** To avoid unintended environmental effects, the shared waters document should undergo SEA screening and AA screening prior to implementation.	**Action 2.2(1):** The DHLGH has confirmed that the Shared Waters document is intended to summarise in one document, the content of the RBMP and POMs for each jurisdiction for shared catchments. All RBMPs and POMs have already been subjected to SEA and AA screening. Therefore, this mitigation has not been brought forward by the DHLGH into the final RBMP.
What we want to achieve – Chapter 2, Section 2.4 of the draft RBMP	• **Action 2.4(1):** SEA and AA screening of the Integrated Catchment Management Plans will be required to determine the potential for significant environmental effects. If those documents do not contain action specific and location specific detail, then the DHLGH will identify the appropriate plan scale to undertake further SEA and plan level AA prior to implementation. • **Action 2.4(5):** The revised Water Services Strategic Plan (WSSP) will require SEA and AA. Furthermore, an audit the successes and failures of the plan and the environmental protections will be undertaken to inform the next cycle. • **Action 2.4(6):** As with the WSSP provided by Irish Water, the rural waters strategic plan will need to undergo SEA and AA prior to its adoption.	**Action 2.4(1):** This mitigation has not been taken onboard. SEA and AA screening will not be carried out for the Catchment Management Work Plans. SEA and AA will not be conducted on the Sectoral Action Work Plans. The SEA Team note that this mitigation was not brought forward. The intent of the mitigation was to ensure that other environmental receptors such as PHH, CH, LandS and MA were not impacted unintentionally. As noted, if the Catchment Management Work Plans or Sectoral Action Work Plans are not the appropriate place for this environmental consideration, the DHLGH should make clear the appropriate plan scale it will be considered at prior to implementation if significant negative effects on wider environmental receptors are to be avoided. **Action 2.4(5)**: Noted. Uisce Éireann is the Competent Authority for the WSSP and will be responsible for screening for SEA and AA. No change made to final RBMP. **Action 2.4(6):** Noted. The Competent Authority for the Rural Waters Strategic Plan will be responsible for screening for SEA and AA. No change made to final RBMP.
Other Plans and Programmes – Chapter 2, Section 2.5 of the draft RBMP	• **Actions 2.5(1) and 2.5(2):** More clarity is required on how the integration across the draft RBMP's sectoral plans and policies is to be achieved and monitoring of its effectiveness.	The following text has been added into the final RBMP: Chapter 6- "*A number of sectoral policies are being reviewed to more closely align with and support the objectives of the National River Basin Management Plan.*" Chapter 8- *"Uisce Éireann has also been tasked to develop plans to ensure*

Section in RBMP	Proposed Mitigation	DHLGH Response on How these Have Been Addressed in the Final RBMP
		security of supply and sufficient capacity in drinking and wastewater networks to allow for balanced regional development. Uisce Éireann funding is subject to a number of formal steps. The Minister prepares a Water Services Policy Statement21. This sets out Government water policy objectives and priorities. Uisce Éireann prepares a Water Services Strategic Plan22 for a 25 year period."
Our Water Resources		
The Current Condition of our Waters – Chapter 3, Section 3.1 of draft RBMP	*None proposed.*	N/A
Artificial and Heavily Modified Water Bodies – Chapter 3, Section 3.3 of draft RBMP	*None proposed.*	N/A
Impacts of Climate Change – Chapter 3, Section 3.4 of draft RBMP	• **Action 3.4(1):** The process for 'climate-checking' the RBMP measures must be transparent and must be applied from the RBMP down to water body measures. • **Action 3.4(3) and 3.4(4):** More specific information is required on the additional research and monitoring actions in the area of climate change. An analysis of the gaps in knowledge and understanding is needed to focus monitoring and research over the plan period. Recommended that an action to identify and prioritise areas for monitoring and research is included.	**Action 3.4(1):** The DHLGH noted that all projects/programmes take climate checking into consideration in accordance with the EIA Directive. Guidance notes on the projects listed in Annex I and II of the EIA Directive already calls for the impact of climate change on the project and its implementation to be considered early on in the project. All implementation bodies will be reminded of the importance of climate checking their respective actions and implementation monitored by the RBMP Project Delivery Office. Also, an updated **Action 3.**2 included in the RBMP states "*DHLGH will review and update the Climate Adaptation Plan for the Water Quality and Water Infrastructure Sectors.*" The SEA Team note that it is not the scope of an EIAR to consider whether Government policy has effectively considered policies it is proposing is future proofed for climate. EIA is project focussed and cannot change policy. Inclusion of updated Action 3.2 inf the final RBMP is welcome. **Action 3.4(3) and 3.4(4):** Implementation of publicly funded projects under the Nature-based surface water management implementation strategy to be undertaken. Will bring learning from relevant sectors to provide greater climate resilience in water management, greener urban environments and

Section in RBMP	Proposed Mitigation	DHLGH Response on How these Have Been Addressed in the Final RBMP
		improving water quality. Action in relation to National Monitoring Programme has been deleted. Additional climate change research project through NFGWS pilot project to introduce climate change and biodiversity initiatives in rural communities. Further research studies to be advanced under Joint Research Programme on Water – further research on climate change challenges can be emphasised.
Implementation of Second Cycle Plan		
Continuing, Monitoring, Evaluation and Review – Chapter 4, Section 4.3 of draft RBMP	• **General:** Overall implementation of the draft Plan would benefit from clarifying in greater detail the roles and responsibilities in terms of the various groups involved in RBMP/WFD implementation. • **Action 4.3(3):** There would be merit in including a mid-term review on overall progress on plan measures, as well as development of intermediate outcomes to help track progress, which was identified as a monitoring gap from the EPA/IPA research.	**General:** The roles and responsibilities for implementing the measures in the RBMP and POMs are set out in the appendix under each action **Action 4.3(3):** The progress with measures will be monitored on an ongoing basis by the NCMC and WPAC. The development of the Catchment Management Plans includes to consideration of appropriate KPIs for the purpose of monitoring progress in RBMP implementation. The development of a spatial data capture system (proposed to be incorporated in to the EDEN WFD Application) of implementation data from each responsible authority will allow for the timely review of KPIs versus target timelines established in the Catchment Management Plans.
Assessment of the Programme of Measures		
Protection of Waterbodies		
Protection of Waterbodies- Chapter 5, Section 5.2 of draft RBMP	• **Protection 1:** A mid-term review should be conducted to assess progress on implementing the identified options for improving WFD compliance.	The progress with measures will be monitored on an ongoing basis by the NCMC and WPAC. The development of the Catchment Management Plans includes to consideration of appropriate KPIs for the purpose of monitoring progress in RBMP implementation. In relation to the Action in Section 5.2 specifically, the text has been modified in consultation with the EPA as follows: "*The National Technical Implementation Group will identify the issues preventing water quality objectives from being achieved and will identify any further evidence, legislative, policy or implementation gaps that need to be addressed.*" The development of a spatial data capture system of implementation data from each responsible authority will also allow for the timely review of KPIs versus target timelines established in the Catchment Management Plans.
Structural/ Societal Measures		
Implementation and	• **Structural / Societal Measures General:** An environmental risk	As proposed above SEA and AA screening will be applied to the Integrated

Section in RBMP	Proposed Mitigation	DHLGH Response on How these Have Been Addressed in the Final RBMP
Governance – Chapter 5, Section 5.3 of draft RBMP	assessment approach shall be developed by DHLGH and implemented at LAWPRO level to inform decision-making. This approach should give consideration to, and take account of, broader environmental issues that may be impacted by RBMP measures and be applied prior to the rollout of any measures. This should be done with reference to existing tools (e.g., EPA Environmental Sensitivity Mapping tool and AA GeoTool) to inform wider environmental sensitivities in the area targeted by measures. See Section 9.1.1 of this environmental report for further detail on an outline approach. • **Structural / Societal 2:** The catchment plans must be subject to SEA and AA screening and environmental risk assessment as per the general mitigation as appropriate. • **Structural / Societal 5:** Provide awareness training to local initiatives on impact pathways to inter-related environmental receptors to ensure actions to improve water quality do not lead to a deterioration in other environmental receptors.	Catchment Management Plans to determine the potential for significant environmental effects. This will first be undertaken in the five selected Pilot Catchments identified by LAWPRO. Furthermore, environmental assessments will be applied at project level as required by planning law. Any works requiring planning consent will be subject to environmental screening. The forthcoming Water & Planning Guidance will assist planning authorities and applicants in applying these environmental assessments. Training in the use of the guidance will be provided. A review of the Community Water Development Fund, administered by LAWPRO on behalf of the DHLGH will begin in Q3 of 2023. The review will lead to an updated funding structure. As part of current CWDF applicant information, requirements for environmental assessments are outlined. Further guidance will be developed for applicants, and provision of knowledge and awareness sessions are proposed, potentially through LAWPRO or other delivery mechanisms e.g. The Rivers Trust (iCatch) etc.
Areas for Action	• **Areas for Action General Mitigation:** An environmental risk assessment approach shall be developed by DHLGH and implemented at LAWPRO level to inform decision-making. This approach should give consideration to, and take account of, broader environmental issues that may be impacted by RBMP measures and be applied prior to the rollout of any measures. This should be done with reference to existing tools (e.g., EPA Environmental Sensitivity Mapping tool and AA GeoTool) to inform wider environmental sensitivities in the area targeted by measures. See Section 9.1.1 of this environmental report for further detail on an outline approach. • **Areas for Action 1-3:** Similar to Areas for Action 4 a detailed work plan, through which the progress in the rollout of the proposed measures and actions can be audited on a regular basis to ensure progress, is required. • **Areas for Action 1-4:** As noted previously, the catchment management plans, and county level implementation plans must be subject to an environmental risk assessment. • **Areas for Action 1-4:** Catchment management plans and county level implementation plans must be screened for SEA and AA prior to implementation. • **Areas for Action 1-4:** All works, measures and projects proposed must undergo AA screening to ensure no likely significant effects on a European site, in view of the conservation objectives of the site, alone or in combination with other plans and projects.	**General Mitigation:** Areas for Action, where measures are required, will be identified via the preparation of Catchment Management Plans which will be subject to SEA and AA screening. Furthermore, environmental assessments will be applied at project level as required by planning law. **Areas for Action 1-3:** Progress will be monitored against KPIs established with each implementation body. LAWPRO to coordinate the preparation of the 46 Catchment Management Plans. EPA to further develop the EDEN WFD Web application to facilitate the tracking of KPIs and spatial analysis of implementation data. **Areas for Action 1 – 4:** Catchment Management Plans will be screened for SEA/AA, starting with the 5 Pilot Catchments. **Areas for Action 1 – 4:** Catchment Management Plans will include the work of Local Authorities under the RMCEI (Recommended Minimum Criteria for Environmental Inspections) for which each LA prepares an annual plan. Each Catchment Management Plan prepared, will be also displayed at the County scale, for ease of information sharing and interpretation at that scale. They will not be separate plans – Catchment Management Plans will be subject to screening for SEA and AA as outlined previously.

Section in RBMP	Proposed Mitigation	DHLGH Response on How these Have Been Addressed in the Final RBMP
		Areas for Action 1 – 4: environmental assessments will be applied at project level as required by planning law.
Public Participation	• Training of local communities and Rivers Trusts should include awareness of indirect negative effects for wider environmental receptors. Introduction and training in the use of the EPA Environmental Sensitivity Mapping Tool and AA GeoTool should be a pre-requisite to any funding of projects in local communities to avoid unintended consequences on the wider environment. Obligations of LA's (and in turn LAWPRO) with respect to the Birds and Natural Habitats Regulations, 2011, as amended, should also be noted as part of training and awareness for LAWPRO. • Develop indicators of effectiveness for NbS and a monitoring programme to properly establish the co-benefits for actions, measures and projects derived from the RBMP.	Further activation, development and support of local level initiatives (rivers trusts, catchment partnerships), additional supports to groups will include understanding of environmental impact assessment requirements, and cumulative impact assessments associated with water projects they wish to deliver. The iCatch Hub Network, which LAWPRO provides funding to the Rivers Trust to operate, consists of a network of established Rivers Trusts/Catchment Associations, to share experiences, receive training and information sessions on relevant topics. iCatch can facilitate such training for groups. NbS - environmental assessments will be applied at project level as required by planning law. The SEA Team would note that project level statutory impact assessments are not a substitute for establishing effectiveness of NbS or for identifying co-benefits for actions, measures and projects.
Environmental Measures		
Agriculture	• **Agriculture 1:** – As the SEA and AA of the fifth NAP is underway, this measure should align with the outcomes of those processes as it is currently unclear whether nutrient controls will remain as they are or whether the fifth NAP will impose tighter controls. – A risk assessment and screening for AA on a farm-by-farm basis must accompany any derogations under the NAP. • **Agriculture 3:** – Consider rolling out practical training and consistent awareness-raising on the ground so farmers can effectively utilise and apply the suite of available tools. – Greater certainty is needed on who has responsibility for developing Farm Sustainability Plans. • **Agriculture 4:** As the SEA and AA of the CAP Strategic Plan is underway, this measure should align with the outcomes of those processes as it is currently unclear what mitigations will be required from the SEA/AA processes.	**Agriculture 1:** The Fifth NAP was finalised and published on the 11 March and all details can be found at: www.gov.ie e Fifth NAP imposes tighter controls. **Agriculture 3:** Noted. The training referred to here is in relation to the Farm Sustainability Plans, which is being led by and is the responsibility of Teagasc. Elements of training that DHLGH are carrying out in terms of Agriculture whilst not explicitly mentioned are integrated into various actions of the plan, include the following: (i) under the ACRES Cooperation project of the CSP, a training course on "Catchment Science and Management" was delivered to members of the ACRES Cooperation Project Teams in February 2023. CP teams will then adopt training for delivery to Farm Advisors/Farmers in each of their CP areas. This will help to target actions at farm level. In addition, each CP team have been allocated a space on the 8-day CSM course delivered by LAWPRO; and (ii) as part of NAP and the associated LA national inspection programme – training will be rolled out to LA staff. Learnings from this training will filter down to farmers on the ground through LA inspections. **Agriculture 4:** Noted. DAFM is the Competent Authority for the CAP

Section in RBMP	Proposed Mitigation	DHLGH Response on How these Have Been Addressed in the Final RBMP
		Strategic Plan and will be responsible for screening for SEA and AA. No change made to final RBMP.
Natural Rivers and Lakes and River Restoration - Hydromorphology	• **Hydromorphology General:** An environmental risk assessment approach shall be developed by DHLGH and implemented at LAWPRO level to inform decision-making. This approach should give consideration to, and take account of, broader environmental issues that may be impacted by RBMP measures and be applied prior to the rollout of any measures. This should be done with reference to existing tools (e.g., EPA Environmental Sensitivity Mapping tool and AA GeoTool) to inform wider environmental sensitivities in the area targeted by measures. See Section 9.1.1 of this environmental report for further detail on an outline approach. • **Hydromorph General:** The general risk assessment should establish whether other specific surveys/assessments are required e.g., hydrological monitoring for downstream effects, increased flood risk downstream, impacts on other biodiversity and aquatic species such as otter, heritage surveys etc. • **Hydromorph 1:** A commitment to the timelines for the legislation and the CoP/GBRs would strengthen the action as delays will present opportunity for further cumulative negative effects to occur on water bodies under pressure from hydromorphological pressures. • **Hydromorph 2:** – Prior to any national programme of removal, an environmental assessment will be undertaken as per the Hydromorphology General Mitigation. – Groups and Agencies tasked with the activity should receive training in environmental assessment of the wider receiving environment. – Where removal of a barrier may have adverse effects on site integrity and achievement of Conservation Objectives in a European site it will not be permitted. • **Hydromorph 3:** – The Annacotty Weir Mulkear pilot project should be screened for Appropriate Assessment. – A general risk assessment should be undertaken to establish the broader environmental sensitivities and establish whether other specific surveys/ assessments are required e.g., hydrological monitoring for downstream effects, increased flood risk downstream, impacts on other biodiversity and aquatic species such as otter, heritage surveys etc.	**Hydromorph General**: IFI have drafted guiding principles to inform a filter process that is based on a list of criteria and indicators that capture the ecological key factors important to effective barrier mitigation (catchment hydrology, connectivity, biodiversity, water quality), as well as crucial socio-economic aspects (e.g., infrastructure, flood protection, public attitude) that need to be considered when planning for intervention. The Barriers Mitigation Programme will also draft guidance on funding, scoping, application / assessment documentation and a list of all required surveys. IFI will also create a catalogue for works for reference. **Hydromorph General**: A general risk assessment will be completed for each site on a case-by-case basis to determine what surveys or assessments are required. **Hydromorph 1**: Following text has been included in Appendix 1, Box 6 of the RBMP: "*DHLGH to lead in the development of a new regulatory regime in collaboration with other departments and public bodies to address pressures on the physical condition of waters*." The National Hydromorphology Programme will deliver multiple benefits for water, biodiversity and climate mitigation and adaptation. To achieve these benefits, a programme is proposed to deliver a new consolidated piece of legislation that will control physical changes in or near water that have a potential to impact on the status of water, thus preventing the achievement of Water Framework Directive objectives. It is anticipated that this will require new legislation, including a Bill and associated secondary legislation aimed at managing hydromorphological pressures to ensure that bodies of water will achieve the required ecological status or potential as required under the Water Framework Directive. The National Hydromorphology Programme is directly relevant to the statutory functions and responsibilities of a number of government departments. This will require new legislation, including a Bill and associated secondary legislation aimed at managing hydromorphological pressures. It is also anticipated that there will be a need to amend and/or repeal a number of existing pieces of legislation. This will require coordinated effort across

Section in RBMP	Proposed Mitigation	DHLGH Response on How these Have Been Addressed in the Final RBMP
	– The pilot study should examine all options through a feasibility study. If it is determined that complete removal would lead to adverse environmental effects other options should be considered e.g., lowering the gradient or providing a fish pass/ramp. ill not be permitted. • **Hydromorph 4:** – Any proposed project should be screened for Appropriate Assessment. – A general risk assessment should be undertaken to establish the broader environmental sensitivities, as per the Hydromorphology General Mitigation. – The general risk assessment should establish whether other specific surveys/assessments are required e.g., hydrological monitoring for downstream effects, increased flood risk downstream, impacts on other biodiversity and aquatic species such as otter, heritage surveys etc.	departments over the coming years to address several legacy issues that each department has been seeking to resolve. The following key pieces of legislation are likely to be amended (among others): Planning and Development Act (2000) Planning and Development Regulations (2001) The Arterial Drainage Acts (1945 and 1995) * The Local Authorities (Works) Act (1949) EIA (Agriculture) Regulations (2011) Fisheries Act (1959) Foreshore Act (1933) ** The Government has mandated a national Land Use Review which will trigger a review of future drainage needs and practices carried out under the Arterial Drainage Act. The review is led jointly by the Department of Environment, Climate and Communications, the Department of Agriculture, Food and the Marine and the Department of Housing, Local Government and Heritage.* RBMP Programme of Measures includes an updated **Action Hymo 2:** *DHLGH will lead the development of a new enhanced and consolidated legislative regime to address pressures on the physical condition of waters. [Timeframe 2026].* Noted. The only timeframe that can currently be provided is to say during the third cycle RBMP. **Hydromorph 2**: Establish a restoration programme to mitigate the negative impact of past construction in or near water bodies. All required environmental assessments will be undertaken at a local level for each site where mitigation is proposed. All groups and agencies tasked with activity will have the appropriate skills, expertise and training. Under the new National Barriers Mitigation Programme in IFI, all required environmental assessments for barrier mitigation/removal will be carried out

Section in RBMP	Proposed Mitigation	DHLGH Response on How these Have Been Addressed in the Final RBMP
		as part of the planning process. This includes Appropriate Assessment. **Hydromorph 3**: A pilot project will be undertaken for the Annacotty Weir in County Limerick to assist with the design and implementation of the national restoration programme. All required environmental assessments will be undertaken for the Annacotty Weir pilot project (in progress). All environmental and engineering assessments will be completed prior to works commencing. This includes: a topographical survey, a geotechnical survey, a hydrological report. hydraulic modelling for the project, a geomorphological survey, an architectural heritage report, an archaeological report, underwater archaeology of the site, sediment analysis upstream of the weir, a hydraulic assessment and flood study, a pearl mussel survey, AA, NIS, EcIA and an Options Report. The project is being conducted in stages to include: preliminary design of all feasible options and public consultation and design of the preferred option following a decision matrix. **Hydromorph 4**: New supplementary action **Hymo 7** now included which includes implementation of the roadmap of actions to improve fish migration in the lower Shannon at the Hydroelectric scheme located around Parteen and Ardnacrusha. All required environmental and engineering assessments will be undertaken for any works proposed by the roadmap. A general risk assessment will be carried out to determine what environmental/engineering assessments are necessary.
Forestry	• **Forestry General:** – The effectiveness of measures proposed under the Forests & Water: Achieving Objectives under Ireland's River Basin Management Plan 2018-2021 published by DAFM in 2018 should be reviewed to inform the 3rd cycle RBMP measure proposed in order to give focus to the aspects of enforcement activities that need to be strengthened.	The DAFM has commenced a programme of long-term monitoring in 8 selected waterbodies with a high percentage of forest cover. In addition, DAFM works closely with the EPA and LAWPRO and considers the findings of their monitoring work. Afforestation, forest road works, thinning, felling and aerial fertilisation all

Section in RBMP	Proposed Mitigation	DHLGH Response on How these Have Been Addressed in the Final RBMP
	– Specific afforestation, felling and reafforestation guidance for sensitive catchments e.g., of the FPM, oligotrophic lakes and hard water lakes, should be developed by DHPLG to ensure alignment of WFD, Habitats Directive and forestry policy. – DHLGP should review felling and re-planting requirements in sensitive catchments to ensure there is alignment – Coillte, which owns over half of Ireland's forested lands, should apply its integrated Environmental Risk Assessment approach to all its forestry operations. – The DHLGH should work with Coillte to encourage proactive planning and ensure avoidance mitigations can be embedded early in their internal planning process. – Forestry-specific training in relation to WFD assessment of forestry operations should be provided to the sector. – Management plans will be created for all FPM catchments to agree a way forward for existing forestry operations and establish what management regime is required in the medium to long term to protect the species from further harm. • **Forestry 2:** A nuanced approach to setback implementation is require; this would require identification of specific conservation forestry approaches to aid in the management of certain habitats and species, depending on the location of the forestry to ensure habitats and species can meet their Conservation Objectives and that the application of setback distances does not lead to more damage than the existing situation. • **Forestry 3:** It is recommended that the planting of new native woodland is specifically targeted to ensure that ecosystem services benefits are maximised, particularly for high status sites. • **Forestry 4:** Any applications of support measures under the various schemes listed should be subject to AA. • **Forestry 6:** A nuanced approach to setback implementation is require; this would require identification of specific conservation forestry approaches to aid in the management of certain habitats and species, depending on the location of the forestry to ensure habitats and species can meet their Conservation Objectives and that the application of setback distances does not lead to more damage than the existing situation. • **Forestry 7:** Further transparency is required in relation to this measure	require licences to be issued by DAFM in accordance with the Forestry Act, 2014. All licence applications are subject to assessment by the DAFM, (including Appropriate Assessment), which considers the potential impact on sensitive environmental receptors. To ensure a robust assessment, DAFM has increased the number of ecologists evaluating forestry licence applications from 1 (in 2019) to 26 full-time equivalents. Coillte applies its ERA to all of its operations and is subject to the same licensing process as private landowners. The DAFM will provide WFD-specific training to the forestry sector, including machine operators, in 2023. This will be developed with input from Coillte, IFI, EPA and other stakeholders, as appropriate. It is proposed that sectoral Catchment Management Plans will be developed for all pressures, including forestry, and FPM will be considered in forestry CMPs, where the species is present. All forestry licence applications are assessed individually, and setbacks applied are dependent on site conditions, taking into consideration [inter alia] slope, soil type, and whether within the subbasin of a high status objective WB. Minimum setbacks to be applied are set out in the Environmental Requirements for Afforestation and these can be extended if required. In addition, other measures can be applied, such as the use of native woodland establishment through the Forests for Water Scheme, or the refusal of areas proposed for afforestation, in part or in whole. Any landowner can apply to plant forests under the DAFM schemes, including public bodies. The Forestry Programme 2023 – 2027 also includes added incentives to plant native forests in a targeted manner. For example, under Forest Type 2 (Forests for Water), native woodland creation is used for phosphorus interception; where recommended by LAWPRO/ASSAP; for drinking water source protection; as a natural water retention/nature-based solution; for protection and enhancement of fish habitat; and for the expansion of the Annex I alluvial woodland habitat. All applications are subject to screening for appropriate assessment, and appropriate assessment, if deemed necessary, and the DAFM has significantly increased ecological resources in this area in recent years.

Section in RBMP	Proposed Mitigation	DHLGH Response on How these Have Been Addressed in the Final RBMP
	on addressing forestry-related water incidents, and clarity on the processes being followed.	In December 2020, DAFM launched its Forestry Licence Viewer (FLV), which allows members of the public to view forestry licence applications anywhere in the country, alongside their associated documentation and life status. This strongly compliments the public consultation process and also the referral process involving prescribed statutory bodies. Where an incident is detected, all relevant stakeholders are informed, and the issue addressed cooperatively. In future, incidents will also be recorded on the WFD app, and this will help inform assessments of waterbodies by the EPA.
Urban Wastewater	• Many existing urban areas are already located in close proximity to European Sites and areas with high environmental sensitivity. As such, site selection will be essential to avoiding unnecessary impacts. The carrying capacity of the receiving environment will also need to be established to understand what limits should be set for the extent of development. • Recommend that continued compliance with the UWWTD and WFD is ensured as agglomeration populations grow. Development of new infrastructure, or expanded capacity, must be rolled out on a phased basis to match population growth and demand/capacity trends. • **UWW 1, UWW 2 and UWW 4:** Wastewater services must be delivered on a phased basis to match current and projected demand. • **UWW 3:** – The review of WWDLs should prioritise those licences where UWW was identified as a significant pressure during the characterisation work carried out by the EPA. – The measure only references WWDLs; a review of Certificate of Authorisations should also be included, particularly those identified as significant pressures for Cycle 3. • **UWW 4:** Suggest updating and strengthening the wording to better reflect Irish Water's 2027 target of zero raw sewage discharges i.e., to reduce and eventually eliminate untreated wastewater discharges. • **UWW 6:** – Once the UWWT Directive has been renegotiated and transposed into Irish Law, a review of existing WWT licenses and conditions will be required. – Suggest clarifying the wording of the measure in the context of the negotiation/recast of the directive e.g., Ireland will contribute to the	**UWW General 1**: Noted **UWW General 2 & UWW 1, 2 and 4**: Uisce Éireann, through Action 57 continue to invest in wastewater infrastructure for the years 2020 to 2024 and as outlined in Action 58 will continue investment in wastewater infrastructure during the RBMP 3rd Cycle from 2022 to 2027 **UWW 3** : Noted **UWW** 4: Action UWW 4 is now Action UWW 5 and is updated as follows: "*DHLGH will deliver a multi-annual investment programme to provide wastewater infrastructure for villages not served by public wastewater collection systems*." **UWW 6**: Noted

Section in RBMP	Proposed Mitigation	DHLGH Response on How these Have Been Addressed in the Final RBMP
	negotiation of terms of the recast UWWTD.	
Urban runoff pressures	• **Urban Runoff 1:** – Identify the elements of the nature-based solutions implementation strategy that can be applied more widely than urban centres to start the process of mainstreaming in other settlement typologies. – A system to monitor performance should be included in the implementation strategy. • **Urban Runoff General:** – Require that all NbS for flood risk management or green roofs will include for adaptive management, based on long-term monitoring, indicating that the proposed sustainable NbS is performing. – A roadmap for delivery of the actions listed would assist in tracking the effective role out of the approach and allow for integrated planning across other key national documents such as the National Biodiversity Plan, Climate Action Plan and sectoral adaptation strategies.	**Urban Runoff 1:**Noted. However, the current emphasis is on urban runoff pressures. The SEA Team note and accept the focus in this section of the plan is urban however the mitigation is looking at a lessons learned approach for other settlement typologies. A cross reference to other settlement typologies would suffice. **Urban Runoff 1 and General:** Pilot projects are being established under a new Action in the RBMP, which include monitoring. The outcome of these pilot projects will inform future NbS development and delivery.
Domestic Waste Water	• **Domestic Ww 3:** A timeline for review of the applicability of the research into zero discharge nature-based solutions in the context of Ireland's climatic conditions should be included to ensure progress can be monitored as this would be an area where multiple benefits could be achieved in terms of CF, BFF, W.	**Domestic Ww 3:** The research project will be completed in Q2 2025. The outcome of the research project will determine the applicability, or not, of zero discharge NbS for domestic wastewater treatment.
Unknown	*None proposed.*	N/A
Other	• Further consideration is required on the approach to Other Pressures to ensure a coordinated and integrated response in the longer-term.	Noted.
Peat	• **Peat 1-6:** All projects arising out of the proposed measures under Peat should be subject to screening for SEA, EIA and AA as appropriate. • **Peat General**: Measures to mitigate the impact of ammonia from cutaway peatlands in the longer term should be included.	**Peat 1-6:** All environmental assessments will be carried out as required for projects arising. **Peat General**: Noted. Studies ongoing in relation to peat restoration measures.
Industry, Mines and Quarries	• **IMQ General:** Utilise the regulatory regime to review ELVs for licensed facilities which are significant pressures on receiving water bodies. • **IMQ General:** Utilise the regulatory regime to encourage usage of non-toxic alternatives in production and processing steps. • **IMQ 2:** The proposed examination/review of current legislation and opportunities should also consider enforcement in terms of Appropriate Assessment issues and wider environmental conditions on cultural heritage, landscape and land/soil issues which may be included in	**IMQ General:** The following text has been added to section 5.4.10 of the RBMP: "*The EPA have identified IPC, IE and waste licenced facilities that are considered a significant pressure on water quality under the WFD and have prioritised them for enforcement. A site specific enforcement plan has been drawn up for each of the sites and the EPA are carrying out detailed investigations to identify what impact a site may be having on water quality. The EPA will continue to track the progress and implementation of the site specific enforcement plans throughout the 3rd cycle of the RBMP".*

Section in RBMP	Proposed Mitigation	DHLGH Response on How these Have Been Addressed in the Final RBMP
	licences.	
Drinking Water Source Protection	• **Drinking Water Source Protection 1:** The measure would benefit from the inclusion of enhanced environmental enforcement in designated safeguard zones. • **Drinking Water Source Protection General:** Recommend the RBMP includes for the provision for the establishment of land management agreements to enhance drinking water protection measures. There would be opportunities to achieve multiple benefits from land management agreements, using existing incentive schemes which address water quality as well as biodiversity and climate objectives should be considered.	**Drinking Water Source Protection 1:** Noted. **Drinking Water Source Protection General:** Noted.
Invasive Alien Species	• The measures will need to recognise not only transboundary issues with NI for shared waters but also shared responsibilities between freshwater, transitional and marine waters within RoI. Responsibilities for aquatic activities span across a wide range of agencies and departments and this must be addressed as an ecosystem issue. • The issues of IAS will apply to all tourism plans associated with waterways. It is recommended that a general measure is included in relation to tourism plans, as water-based activities and recreation are key vectors for IAS to spread. • Monitoring of the 3rd cycle implementation takes account of progress on the 2nd cycle measures i.e., tracking of the governance arrangements and development of biosecurity guidelines.	Ireland and Northern Ireland share two international river basin districts and through these the WFD places much emphasis on consultation and participation. Since the withdrawal of the United Kingdom (UK) from the European Union, bilateral relations are now principally governed by the terms of the Good Friday (or Belfast) Agreement. Relations between the EU and the UK are governed presently by The Withdrawal Agreement. With the withdrawal of the UK from the EU other international instruments will take on greater importance, such as the ESPOO Convention. Noted. Progress on measures is monitored.
Hazardous Chemicals in the Aquatic Environment	*None proposed.*	N/A
Aquaculture	• The proposed aquaculture mapping tool should distinguish license status notably active versus non-active status in order to properly inform cumulative assessments and establishing carrying capacity for new licenses. Inactive licenses should be reviewed and revoked if necessary. • A terms of reference should be developed and consulted on to inform discussions in relation to strengthening the links between the aquaculture licencing process and the WFD. • Monitoring and compliance reporting for the aquaculture sector should be published on a regular (annual) basis to assist in identifying and remedying unforeseen environmental effects on or from aquaculture. • The proposed review of shellfish quality standards will be based in clear	The aquaculture mapping tool and aquaculture licensing is under the remit of the DAFM. DAFM has committed to working with DHGLH to examine the current aquaculture licensing guidelines and process. The following text has been added to the RBMP: *"DHLGH and DAFM will work collaboratively to consider the current aquaculture licensing guidelines and process in order to ensure that the WFD assessment process is provided for. Following examination, both departments, together with the support of the Marine Institute, will work collectively to update the process/guidelines, if required."*

Section in RBMP	Proposed Mitigation	DHLGH Response on How these Have Been Addressed in the Final RBMP
	evidence base on monitoring and reporting. A timeframe on completion of the review should be included. • Work with BIM and DAFM to fund and complete a feasibility study into MTS which can contribute to achieving improvements in water quality. • A constraints and opportunity map should be developed to inform the identification of new aquaculture sites and ensure the different types of aquaculture are directed to suitable locations taking into account environmental and social needs. • Potential aquaculture areas must be identified through a transparent process which can be subject to SEA and AA at a plan level. In this way, carrying capacities can be addressed at a macro level and the potential for cumulative impacts with other sectors can be properly addressed before individual license applications are made. Supporting infrastructure requirements e.g., ports etc. should also be considered in the identification of sites. • Inclusion of finfish aquaculture measures should be considered.	
Land Use Planning	• **Landuse 1:** – The reference to 'proportionate and unnecessary restrictions' in the supporting text on the aims of Landuse 1 should be removed. – An inventory of existing guidance in relation to water management should be made available on DHLGH's website to ensure best practice is being followed.	Landuse 1: No reference found to proportionate and unnecessary restrictions. The SEA Team can confirm the reference to unnecessary restriction related to an earlier version of the emerging draft and is no longer relevant. Website will be reviewed in 2024 with a view to making guidance available in relation to water management.
Update and Review of the Economic Analysis		
Economic Analysis	• **Economic 5:** The ecosystems services assessment should also take account of socio-economic aspects and environmental issues and have regard to recent research in this area. • **Economic 7:** The Rural Water Services Strategic Plan and Rural Water Services Resource Plan must be subject to SEA and AA.	**Economic 5**: Noted. **Economic 7**: Noted.

Table 4-3: AA Mitigation Measures in the Natura Impact Statement

Section	Mitigation Measures	DHLGH Response on How These Have Been Addressed in the Final RBMP
All		
Overarching Protection 1	The following text will be included in the RBMP: It should be kept in mind that the RBMP does not replace or negate the need for other regulatory requirements particular to specific proposal types and scales, Public Bodies, decision-making processes or locations. Such requirements may apply at any stage of a proposal from investigative and feasibility studies to operation. There is an important role for optioneering at all phases of planning and development to avoid environmental impacts. Requirements include relevant environmental assessments such as, inter alia, Strategic Environmental Assessment (SEA), Environmental Impact Assessment (EIA) and Appropriate Assessment (AA), as appropriate.	Following text is inserted in Chapter 5 of the final RBMP. In addition to the Strategic Environmental Assessment (SEA) and Appropriate Assessment (AA) processes that has been applied to this high level plan, all measures and projects arising during the third-cycle RBMP will be subject to further environmental assessments at the appropriate level, as required. A full list of mitigation measures taken from the SEA and Natura Impact Statement (NIS) that apply to the Programme of Measures can be found in the accompanying appendices to the plan. In completing any required assessment, the responsible agency and/or project partners should ensure the utilisation of the appropriate tools available, such as the EPA's Environmental Sensitivity Mapping Tool (https://enviromap.ie/).
Overarching Protection 2	The following text will be included in the RBMP: Proposals must demonstrate that they can be implemented without adverse effects on the integrity of Special Areas of Conservation (SACs) or Special Protection Areas (SPAs). Where adverse effects from proposals remain following mitigation, in line with Habitats Directive Article 6(3), consent for the proposals cannot be granted unless the prerequisites set by Article 6(4) are met. This will require that alternatives have been considered.	Noted. Following text is inserted in Chapter 5 of the RBMP. Any proposed measures must demonstrate that they can be implemented without adverse effects on the integrity of Special Areas of Conservation (SACs) or Special Protection Areas (SPAs). Where adverse effects from proposals remain following mitigation, in line with Habitats Directive Article 6(3), consent for the proposals cannot be granted unless the prerequisites set by Article 6(4) are met. This will require that alternatives have been considered.
What we want to Achieve		
Action 2.4(1)	To ensure the avoidance of negative effects, the catchment management plan templates must: i. Be based on evidence regarding the eco-hydrological requirements of relevant European sites; ii. Integrate the requirement to maintain and restore the favourable conservation status of European site QI habitats and species and SCI species pertinent to the Catchment; including identifying actions to secure the delivering of this requirement with respect to a particular Catchment. iii. Contribute to the delivery of the Conservation Objectives of the QI habitats and species and SCI species pertinent to the Catchment; including identifying actions which deliver this contribution.	As proposed above in Table 1 SEA and AA screening will be applied to the Integrated Catchment Management Plans to determine the potential for significant environmental effects. This will first be undertaken in the five selected Pilot Catchments identified by LAWPRO, and in consultation with NPWS. The Register of Protection Areas under the WFD includes Natura 2000 sites (SACs and SPAs) and the WFD is required to integrate the requirements of water dependent habitats and species into its programme delivery. Furthermore, environmental assessments will be applied at project level as required by planning law. Any works requiring planning consent will be subject to environmental

Section	Mitigation Measures	DHLGH Response on How These Have Been Addressed in the Final RBMP
	iv. Identify activities within the catchment which prevent or are a threat to delivering (ii) and (iii); the Plan identifying the measures and mechanisms required to remove or reduce the threat – including conformance with relevant existing legislation. In addition, as the content of these plans is not yet available, it will be essential that the 46 plans are screened for AA once available.	screening. The forthcoming Water & Planning Guidance will assist planning authorities and applicants in applying these environmental assessments through the requirement for Water Status Impact Assessments, along with AA screening. It should be noted that with regard to the SEA and AA recommendations (ii) to (iv) a key objective of the RBMP and the supporting catchment management plans is to achieve any specific statutory water standards and objectives established in law to support designated protected areas. It is not the role of the RBMP to achieve, for example, the full conservation objectives of protected areas. These are much broader objectives. The legal obligation to achieve these are under the Habitats Directive. The legal requirement of the WFD is to achieve the necessary water status requirements needed to support the broader conservation objectives. The supporting water status standards/objectives are assumed to be equivalent to Good Ecological Status unless more stringent standards/objectives have been established in law for the protected area. (e.g., Freshwater Pearl Mussel Regulations). An AA determination has been made on the final RBMP and no adverse effects on site integrity of EU sites have been concluded. The SEA Team note the conclusion of the AA determination.
Action 2.4(5)	**Mitigation:** It is essential that the review and update of the WSSP be subject to Appropriate Assessment, especially given that the previous version identified potential for likely significant effects and an NIS was prepared to inform the AA determination. **Recommendation:** It is recommended that Irish Water review the mitigations from the previous NIS to establish their implementation and effectiveness in order to inform the next plan which will be required to engage with the AA process. **Recommendation:** It is recommended that the WSSP take cognisance of the 46 Catchment Management Plans as soon as they are available, noting the mitigation required under Action 2.4(1) in terms of template content.	Noted.
Action 2.4(6)	**Mitigation:** It is essential that the Rural Water Services Strategic Plan is be subject to the AA process. **Recommendation:** It is recommended that the RWSSP take cognisance of the 46 Catchment Management Plans as soon as they are available, noting the mitigation	Noted.

Section	Mitigation Measures	DHLGH Response on How These Have Been Addressed in the Final RBMP
	required under Action 2.4(1) in terms of template content.	
Action 2.4(7)	**Mitigation:** In addition to compliance with the WFD (noting its connection to the Habitats Directive and Birds Directive by way of the register of protected areas) the abstraction licensing process will have to separately show compliance with the Art. 6(3) and if necessary 6(4) of the Habitats Directive and as such will need to be supported by an AA process culminating in an AA determination.	Noted – text provided by Water Policy Unit regarding water abstractions in Section 4.3.2 in final RBMP.
Action 2.4(8)	**Mitigation:** Any potential for exemptions shall be informed by the AA process in addition to any other assessment processes relevant to decision making. An exemption which leads to adverse effects on site integrity of any European site, alone or in combination, cannot be granted a license. In such a circumstance, where mitigations are not possible, alternatives and IROPI conditions must be met if the project is to proceed.	Inserted in the RBMP (Section 4.3.2. What we want to achieve) The SEA Team cannot locate this text.
Action 2.4(9)	**Recommendation:** It is recommended that the membership of the multiagency group under the NTIG shall include a representative from NPWS.	NPWS is a member of the NTIG.
Other Plans and Programmes		
Action 2.5.(2)	**Mitigation:** The measures shall be subject to the AA process under each sectoral policies / plan prior to their adoption.	A number of sectoral policies are being reviewed to align more closely with and support the objectives of the National River Basin Management Plan. All of these are subject to AA screening. The sectoral policies and plans include; The Water Services Policy Statement (2018-2025) which is scheduled to be review in 2023 by Government and the Oireachtas (See Section 5.5). The forthcoming statutory guidelines relating to water and planning will be given effect through amendments to the Planning Act (See Section 5.4.15). Significant cross government collaboration has occurred in relation to the development of the National Common Agricultural Policy Strategic Plan to incorporate measures which will deliver for biodiversity, water and climate action (See Section 5.4.1.). The Department of Agriculture, Food and the Marine, in collaboration with the Department of Housing, Local Government and Heritage is reviewing the 1997 Fisheries (Amendment) Act for the purpose of further strengthening the link between the Water Framework Directive and the aquaculture licensing process (See Section 5.4.14).

Section	Mitigation Measures	DHLGH Response on How These Have Been Addressed in the Final RBMP
Climate Change		
Action 3.4(1)	**Mitigation:** The sensitivity analysis must explicitly consider the potential for changes in QI/SCI population ranges and dynamics if adverse effects are to be avoided.	Noted.
Action 3.4(2)	**Mitigation:** The update of the Climate Adaptation Plan will be subject to Appropriate Assessment process.	Noted. Requirement for appropriate assessment to be undertaken as per S.I. 293 of 2021.
Action 3.4(4)	**Recommendation:** It is recommended that specific research relating to climate change challenges associated with water dependant European sites (including terrestrial habitats which are groundwater dependant) would greatly increase the knowledge base to inform decisions not only on WFD compliance into the future but also Habitat Directive compliance.	Further research studies to be advanced under Joint Research Programme on Water – further research on climate change challenges can be emphasised.
Structural, Societal		
Structural, Societal 5	**Mitigation:** The DHLGH will develop a process to ensure that support, funding and coordination of local initiatives undergoes a risk assessment (carried out by LAWPRO or similar) with regard to likely significant effects on any European site, alone or in combination with other plans and projects. The risk assessment will include the requirement to engage with the AA process. **Mitigation:** Given that this is locally driven the most appropriate stage at which to undertake risk assessments is at the LAWPRO level where ecological expertise to support communities is in place to undertake the assessments. **Mitigation:** Assessment will have regard to the Catchment Management Plans (noting the mitigation required in relation to the content of templates noted under Action 2.4(1). This will ensure a more coordinated approach to local actions. **Mitigation:** The DHLGH will ensure that there is awareness raising and training associated with any funding or support of initiatives to ensure the potential for effects on any European site are understood more widely.	The DHLGH do not propose to establish any additional and separate processes beyond those processes and procedures already in place for AA under Habitats legislation. It is the responsibility of each body responsible for a plan or project to undertake AA screening as appropriate. As proposed in Table 1 above SEA and AA screening will be applied to the Integrated Catchment Management Plans to determine the potential for significant environmental effects. Furthermore, environmental assessments will be applied at project level as required by planning law. However, contrary to the suggestion in the SEA/AA recommendations opposite, responsibility for AA screening will rest with the body implementing the measures, as required by law. Local authorities through LAWPRO will have responsibility for the AA screening of the integrated catchment management plans. Any works requiring planning consent will be subject to environmental screening. The forthcoming Water & Planning Guidance will assist planning authorities and applicants in applying these environmental assessments. Training in the use of the guidance will be provided. A review of the Community Water Development Fund, administered by LAWPRO on behalf of the DHLGH will begin in Q3 of 2023. The review will lead to an updated funding structure. As part of current CWDF applicant information, requirements for environmental assessments are

Section	Mitigation Measures	DHLGH Response on How These Have Been Addressed in the Final RBMP
		outlined. Further guidance will be developed for applicants, and provision of knowledge and awareness sessions are proposed, potentially through LAWPRO or other delivery mechanisms e.g. The Rivers Trust (iCatch) etc.
Implementation / Governance		
Areas for Action 1- 4	**Mitigation:** The DHLGH will develop a process to ensure that support, funding and coordination of such works and projects undergoes a risk assessment (carried out by LAWPRO or similar) with regard to likely significant effects on any European site, alone or in combination with other plans and projects. The risk assessment will include the requirement to engage with the AA process. **Mitigation:** Given that this is locally driven the most appropriate stage at which to undertake risk assessments is at the LAWPRO level where ecological expertise to support communities is in place to undertake the assessments. **Mitigation:** The DHLGH will ensure that there is awareness raising and training associated with any restoration works, works programmes and projects to ensure the potential for effects on any European site are understood more widely. **Mitigation:** Assessment will have regard to the Catchment Management Plans (noting the mitigation required in relation to the content of templates noted under Action 2.4(1). This will ensure a more coordinated approach to local actions. **Mitigation:** All catchment projects shall be subject to the AA process prior to roll out.	Areas for Action, where measures are required, will be identified via the preparation of Catchment Management Plans which will be subject to SEA and AA screening. Furthermore, environmental assessments will be applied at project level as required by planning law. Progress will be monitored against KPIs established with each implementation body. LAWPRO to coordinate the preparation of the 46 Catchment Management Plans. EPA to further develop the EDEN WFD Web application to facilitate the tracking of KPIs and spatial analysis of implementation data. Catchment Management Plans will be screening for SEA/AA, starting with the 5 Pilot Catchments. County level implementation plans will be based on the RMCEI (Recommended Minimum Criteria for Environmental Inspections) Plans prepared annually by Local Authorities. Environmental assessments will be applied at project level as required by planning law.
Public Participation Measures		
Public Participation 1 and 3	**Mitigation:** The consequences of the local initiatives must be considered in project planning (including the requirement (or otherwise) for AA for defined plans or projects) to avoid adverse effects from community engagement initiative. **Mitigation:** To avoid adverse effects on any European site resulting from local initiatives, the DHLGH will develop a process to ensure that support, funding and coordination of local initiatives undergoes a risk assessment (carried out by LAWPRO or similar) with regard to likely significant effects on any European site, alone or in combination with other plans and projects. The risk assessment will include the requirement to engage with the AA process. **Mitigation:** Given that this is locally driven the most appropriate stage at which to undertake risk assessments is at the LAWPRO level where ecological expertise to	Further activation, development and support of local level initiatives (rivers trusts, catchment partnerships), additional supports to groups will include understanding of environmental impact assessment requirements, and cumulative impact assessments associated with water projects they wish to deliver. The iCatch Hub Network, which LAWPRO provides funding to The Rivers Trust to operate, consists of a network of established Rivers Trusts/Catchment Associations, to share experiences, receive training and information sessions on relevant topics. iCatch can facilitate such training for groups. A review of the Community Water Development Fund, administered by

Section	Mitigation Measures	DHLGH Response on How These Have Been Addressed in the Final RBMP
	support communities is in place to undertake the assessments. **Mitigation:** Assessment will have regard to the Catchment Management Plans (noting the mitigation required in relation to the content of templates noted under Action 2.4(1). This will ensure a more coordinated approach to local actions. **Mitigation:** The DHLGH will ensure that there is awareness raising and training associated with any funding or support of initiatives to ensure the potential for effects on any European site are understood more widely. **Mitigation:** All catchment plans or projects shall be subject to the AA process prior to roll out.	LAWPRO on behalf of the DHLGH will begin in Q3 of 2023. The review will lead to an updated funding structure. As part of current CWDF applicant information, requirements for environmental assessments are outlined. Further guidance will be developed for applicants, and provision of knowledge and awareness sessions are proposed, potentially through LAWPRO or other delivery mechanisms e.g. The Rivers Trust (iCatch) etc.
Public Participation 4	**Mitigation:** The DHLGH will ensure that there is awareness raising and if necessary, training associated with any funding or support of initiatives to ensure the potential for effects on any European site are understood more widely. This should include the development of risk assessment templates by LAWPRO or similar for use in the programme. **Mitigation:** The national citizen science programme will link to the Catchment Management Plans (noting the mitigation required in relation to the content of templates noted under Action 2.4(1). This will ensure a more coordinated approach to local actions.	As Above. A review of the Community Water Development Fund, administered by LAWPRO on behalf of the DHLGH is underway. The review will lead to an updated funding structure. As part of current CWDF applicant information, requirements for environmental assessments are outlined. Further guidance will be developed for applicants, and provision of knowledge and awareness sessions are proposed, potentially through LAWPRO or other delivery mechanisms e.g. The Rivers Trust (iCatch) etc. Agreed.
Agriculture		
Agriculture 1	**Mitigation:** The new NAP will be subject to AA and SEA in its own right and the new NAP will be required to be cognisant of the RBMP; including the mitigations identified within this NIS for the RBMP. **Mitigation:** Any derogations which emerge from the NAP will be subject to AA; which should include a robust assessment of in-combination adverse effects.	The Fifth NAP was finalised and published on the 11 March and all details can be found at: www.gov.ie e Fifth NAP imposes tighter controls. The SEA and AA can also be found at this link along with the AA Determination undertaken by the Ecological Assessment Unit.
Agriculture 2	**Mitigation:** The proposed new RDP Regulations underpinning the green architecture as foreseen under the CAP Strategic Plan will need to take full account of the mitigation measures identified in the NIS being prepared for that Plan (under separate cover).	Noted. This is the responsibility of DAFM and not under the remit of DHLGH.
Agriculture 3	**Recommendation:** It is recommended that training is provided to ensure the online tool is properly used.	Noted. This is the responsibility of Teagasc, who is the lead organisation of this action. It is not under the remit of DHLGH.
Agriculture 4	**Mitigation:** The CAP Strategic Plan will need to take full account of the mitigation measures identified in the NIS being prepared for that Plan (under separate cover).	Noted. This is the responsibility of DAFM and not under the remit of DHLGH.

Section	Mitigation Measures	DHLGH Response on How These Have Been Addressed in the Final RBMP
Agriculture 5	**Mitigation:** The new authorisation system for in-stream engineering works shall include requirement for AA prior to authorisation being given; including requirement to implement any mitigation measures identified as part of the AA process. **Mitigation:** The DHLGH will ensure that there is awareness raising and training associated with instream engineering works to ensure the potential for adverse effects is understood more widely.	Noted. It is acknowledged that screening for Appropriate Assessment will be necessary as part of the authorisation process. Noted. As with the introduction of any new authorisation system awareness raising and training will be a necessary element of implementation.
Hydro-morphology		
Hydromorph 1	**Mitigation:** The development of a new legislative regime will not give rise to adverse effects however, the new legislation must formally include the need for protection of European sites, their QI and SCI in decision making and the need for application of the AA process as part of the control regime.	Noted for inclusion in Controlled Activities for the Protection of Waters regime when drafting.
Hydromorph 2	**Mitigation:** A risk assessment is needed to inform actions that are to be implemented on the ground. Given that specific measures will be decided upon at a more local level the most appropriate stage at which to undertake such assessments is at the LAWPRO level where ecological expertise to support communities is in place to undertake the assessments. **Mitigation:** The DHLGH will ensure that there is awareness raising and training associated with any funding of initiatives to ensure the potential for adverse effects is understood more widely.	Noted. IFI will undertake actions on the ground through which will be guided by the Hydromorphology Expert Group. Noted.
Hydromorph 3	**Mitigation:** It is essential that all pilot projects proposed, and the subsequent restoration programme are subject to AA to inform design solutions and support planning.	Noted. IFI are in the process of completing all required environmental assessment to inform design and support planning.
Hydromorph 4	**Mitigation:** The actions once developed shall undergo screening for AA and preparation of an NIS, supported by hydrological modelling if required, to determine if the actions will have adverse effects on any QI/SCI or site integrity and inform the formal determination on AA. **Mitigation:** All actions proposed will also be informed by ecological impact assessment to ensure no unintended consequences on wider supporting biodiversity.	Noted. All required environmental assessments will be undertaken prior to any works commencing. All works will be guided by the Steering Group. Noted. All required environmental assessments will be undertaken prior to any works commencing. All works will be guided by the Steering Group.
Forestry		
Forestry 1	**Mitigation:** DAFM will integrate into their licensing process, a framework for consideration of in-combination effects at the catchment/ sub-catchment level to better inform AA determinations. **Mitigation:** DAFM to develop a GIS layer showing key forestry constraints including waterbodies at risk from forestry, high status areas, protected areas under WFD (which includes SAC/SPA) and water dependant ecosystems, all of which are available through the WFD app but may not be known or understood by individual	All licence applications are subject to screening for AA, and AA, if deemed necessary, and this includes an in-combination assessment and the assessment of the risk from forestry operations to specific environmental receptors. The DAFM uses a bespoke GIS platform for forestry licence assessments, known as IFORIS. The system has been in place since 2006 and is

Section	Mitigation Measures	DHLGH Response on How These Have Been Addressed in the Final RBMP
	applicants. This type of GIS support can inform forestry applications by avoiding high risk areas as a starting point. **Mitigation:** DAFM to develop a risk matrix in relation to forestry impacts on QI/SCI to inform sensitivity analysis.	constantly being updated. Included in this system's dataset are [inter alia] EPA waterbodies and their sub-basins (which include information on whether forestry is a pressure); HSO waterbodies; Natura sites; NHA; pNHA; FPM population locations; Irish Water and NFGWS drinking water abstractions, etc. In addition, where a referral is received from LAWPRO, the boundary area is also added to IFORIS and the referral is considered by the Inspector and/or Ecologist assessing the application. There is also a public facing version of this tool called iNET, where Registered Foresters submitting applications also have access to this information, with specific sensitivities removed in relation to the location of certain populations of protected species.
Forestry 2	**Mitigation:** DAFM to identify areas where conservation forestry practices will be required as a response to existing forestry pressures on known QI/SCI effected by historic forestry activity.	All forestry licence applications are subject to the requirements set in in 6(3) of the Habitats Directive, regarding screening for appropriate assessment and appropriate assessment, if required. In addition, reforestation presents an opportunity to restructure forests, including the creation of wider setbacks, unplanted areas, changes of species, etc. The Forestry Programme 2023 – 2027 includes a number of proposed grant aided measures such as the construction of attenuation areas, grants for conversion to CCF or native woodland, use of temporary bridging and other innovative harvesting technology, the creation of setbacks that may not have been installed at establishment historically, and the removal of undesirable natural regeneration from sensitive areas. The sectoral CMP will also identify specific areas for the implementation of these schemes. Furthermore, DAFM's Felling & Reforestation Policy allows for permanent forest removal where overriding environmental concerns exist. In addition, Coillte, through its not-for-profit division Coillte Nature, has commenced a number of bog restoration projects.
Forestry 3	**Mitigation:** The creation of new forests will need to be outside European Sites; unless the activity is directly connected with or necessary to the management of the European Site for nature conservation; and **Mitigation:** The creation of new forests outside of European Sites, particularly those whose designated interests are hydrologically dependent, will need to demonstrate no adverse effect on the eco-hydrological function of the European Site which underpins maintaining the favourable conservation status of the Site and its associated QIs/SCIs. **Recommendation:** It is recommended that the planting of new native woodland is specifically targeted to ensure that ecosystem services benefits are maximised, particularly for high status sites.	All forestry licence applications are subject to DAFM's forestry-related appropriate assessment procedure, and the licencing assessment includes a referral process to relevant statutory authorities. Where applications are within Natura designated sites or NHAs, consent is required from NPWS. Afforestation has not been permitted in Hen Harrier SPAs since 2013. Any landowner can apply to plant forests under the DAFM schemes, including public bodies. The Forestry Programme 2023 – 2027 also includes added incentives to plant native forests in a targeted manner. For example, For example, under Forest Type 2 (Forests for Water), native woodland creation is used for phosphorus interception; where

Section	Mitigation Measures	DHLGH Response on How These Have Been Addressed in the Final RBMP
		recommended by LAWPRO/ASSAP; for drinking water source protection; as a natural water retention/nature-based solution; for protection and enhancement of fish habitat; and for the expansion of the Annex I alluvial woodland habitat.
Forestry 4	**Mitigation:** Any application of support measures under these schemes must be subject to AA	See 3 above.
Forestry 6	**Mitigation:** DAFM to identify areas where conservation forestry practices will be required as a response to existing forestry pressures on known QI/SCI effected by historic forestry activity.	Repetition of Forestry 2.
Forestry 7	**Mitigation:** Further transparency is required in relation to this measure and clarity on the processes followed, particularly if such forestry-related water incidents lead to damage to European sites, their QI or SCIs. **Mitigation:** DHLGH, working with DAFM will prepare a clear process for the recording and follow up of any forestry related water- incidents with potential for direct or indirect significant effects / adverse impacts on a European site, its QI or SCI. Initially this will require a risk assessment in relation to pathways for impact and consideration of impacts on achieving conservation objectives. Where effects are identified a co-ordinated response including NPWS, EPA, DAFM and DHLGH will be required.	In December 2020, DAFM launched its Forestry Licence Viewer (FLV), which allows members of the public to view forestry licence applications anywhere in the country, alongside their associated documentation and life status This strongly compliments the public consultation process and also the referral process involving prescribed statutory bodies. Where an incident is detected, all relevant stakeholders are informed, and the incident addressed cooperatively. In future, incidents will also be recorded on the WFD app, and this will help inform assessments of waterbodies by the EPA.
Urban Waste Water		
UWW 1	**Mitigation:** Waste water infrastructure is subject to planning and / or licensing of discharges. Both will require AA to inform decision making by the relevant competent authority thereby avoiding and / or mitigating the risk of any adverse effects.	As above.
UWW 3	**Recommendation:** It is recommended that the measure also reflect the need to prioritise achieving Habitats Directive objectives and the conservation objectives of individual European Sites.	As above.
UWW 4	**Mitigation:** All investment decisions must be informed by an AA carried out by the relevant competent authority	As above.
UWW 5	**Mitigation:** These projects will require planning and / or licenses which by law will be subject to AA at the site specific level.	Noted.
UWW 9	**Mitigation:** Proposed works will need to be screened for EIA and AA as a minimum as per normal planning and environmental assessment processes.	Noted.
Urban Pressures		
Urban Runoff 2	**Recommendation:** It is recommended that for complete clarity, the guidance specifically reference compliance with the EU Habitats and Birds Directives and the	Noted.

Section	Mitigation Measures	DHLGH Response on How These Have Been Addressed in the Final RBMP
	need for consideration of both Conservation Objectives for any European sites and related WFD Objectives.	
Urban Runoff 3	**Mitigation:** Any approach or project relating to Dublin Bay (or any measures arising from the approach or project) will be subject to AA.	Noted.
Urban Runoff 6	**Mitigation:** All integrated urban drainage management plans will be screened for AA once prepared. The urban drainage management plans will need to contribute positively to achieving, maintaining, and restoring the favourable conservation status of European sites and their associated QIs/SCIs for the area covered by the Plan	Noted.
Domestic Waste water		
Domestic Ww 1	**Mitigation:** Any consent and/or licensing associated with such upgrades must be subject to AA.	Noted
Other		
Other 1	**Mitigation:** Further transparency is required in relation to this measure. The measure should be revised to be specific in action and intent to facilitate oversight.	Noted
Peat		
Peat 1	**Mitigation:** Any modifications to the plan or indeed preparation of a new Implementation Plan arising out of the mid-term review must be subject to the AA process.	Any modifications to the plan or actions arising from the implementation plan will be subject to the AA process as required.
Peat 2	**Mitigation:** Where continued cutting is to be permitted on SAC bogs despite adverse effects on site integrity, an Article 6(4) derogation will be required to support the permission/licensing. This will require that alternatives have considered which include provisions of alternative fuel sources for example. **Mitigation:** Each restoration proposal relating to raised bog SAC will require AA which may in limited cases include consideration of imperative reasons of over-riding public interest where no less damaging alternative can be found.	Appropriate Assessment is required for all such works, which would determine the need for an Article 4(6) derogation should it be required. AA will be carried out for each restoration proposal which will include consideration of imperative reasons of overriding public interest where necessary.
Peat 7	**Mitigation:** AA screening of the specific actions under the Wild Atlantic Nature project will be required to ensure indirect or ex-situ effects are fully considered.	Noted. All required environmental assessments will be undertaken prior to any works commencing.
Invasive		
Invasive 2	**Mitigation:** Each management plan must undergo AA process to ensure that the pathways for impact are fully understood and accounted for in any actions. **Recommendation:** It is recommended that clarity is provided on what species are to be included.	Each management plan will undergo AA process as required. Noted.
Invasive 4	**Mitigation:** AA screening of projects tackling Invasive Alien Species will be required to ensure these direct, indirect or ex-situ effects are fully considered.	Noted. All required environmental assessments will be undertaken prior to any works commencing.

Section	Mitigation Measures	DHLGH Response on How These Have Been Addressed in the Final RBMP
Invasive 5	**Mitigation:** AA screening of projects tackling control of Invasive Alien Species will be required to ensure these direct, indirect or ex-situ effects are fully considered.	Noted. All required environmental assessments will be undertaken prior to any works commencing.
Land Use		
Land Use 1	**Recommendation:** It is recommended that the training specifically addresses the integration of WFD with the Habitats Directive. Specifically, it should address the issues of overlap, potential for conflicting or more onerous objectives under the different pieces of legislation and the differences in "tests" for assessment purposes under both pieces of legislation.	Noted for inclusion in design of training course material.
Land Use 2	**Recommendation:** It is recommended that the legislation clarifies how the requirements of the Habitats Directive are to be considered and the process where conflicts arise.	Noted for inclusion in drafting legislation.
Economic		
Economic 1	**Mitigation:** Proposals must demonstrate that they can be implemented without adverse effects on the integrity of Special Areas of Conservation (SACs) or Special Protection Areas (SPAs), unless there are Imperative Reasons of Overriding Public Interest (IROPI) and no satisfactory alternatives (consistent with Article 6(4) of the Habitats Directive.	Noted.
Economic 2	**Mitigation:** CRU approvals in relation to investment decisions will need to ensure that AA has been completed by the relevant competent authority as a condition of investment. It is noted that Irish Water has previously applied AA throughout its planning hierarchy to ensure avoidance and mitigation measures can be integrated.	Noted.
Economic 3	**Mitigation:** IW as the competent authority will need to undertake further AA as more location specific information is included.	Noted.
Economic 6	**Mitigation:** All investment decisions must be informed by an AA carried out by the relevant competent authority.	Noted.
Economic 7	**Mitigation:** AA will be required for the plans. The DHLGH will ensure the AA process is applied to the plans prior to their adoption.	Noted.

5 HOW CONSULTATION FEEDBACK HAS INFLUENCED THE RBMP

Two streams of statutory consultation have feed into the development of the RBMP. The first is derived from the requirements of Article 14 of the Water Framework Directive and the second from Article 9 of the SEA Directive.

5.1 Consultation Under Article 14 of the Water Framework Directive

As a requirement of Article 14 of the Water Framework Directive (WFD), it is necessary to encourage the active involvement of all interested parties in the implementation of the WFD, in particular in relation to the production, review and updating of River Basin Management Plans. The activities included a combination of consultation, stakeholder engagement and public access to information. The extent of consultation activities undertaken by the DHLGH in fulfilment of this requirement is summarised in **Appendix 1** of this Report.

5.2 Consultation Under Article 9 of the Strategic Environmental Assessment Directive

As a requirement of Article 9 of the Strategic Environmental Assessment Directive, Information on the Decision, and in parallel with the WFD requirements noted above, statutory consultation was undertaken in the draft RBMP as published on 27th September 2021 alongside the SEA Environmental Report and the NIS. All documents were available for inspection and download online.[2]

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

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

Of these, 259 were identified as unique content. The questionnaire submissions included responses to 26 questions set by the DHLGH, with responses submitted either through their online survey or by completing a template response document and sending it to the DHLGH. Each questionnaire was reviewed individually to provide a summary per question (noting not all questions were answered by all respondents) and an overall summary was then prepared for each question once all 161 submissions had been reviewed. In addition, key themes raised were noted for each submission.

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

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

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

[2] Department of Housing, Local Government & Heritage (DHLGH) (www.gov.ie)

- Political.

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

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

- **Water Quality / Pollution –** Key issues raised included the need for clear water governance and adequate investment; lack of specific measures to improve water quality in the plan; inefficient liaison with water stakeholders; transparency from authorities working in the water sector; large number of water bodies being subjected to wastewater pollution and extensive arterial drainage; lack of prosecution for defaulters and impact of water quality on public health.
- **Agricultural Practices -** Key issues raised included the lack of recognition of the conflict between agriculture and WFD targets; urgency related to nutrient pollution; need for better incentives for farmers to promote good practices; stronger enforcement; need for WFD specific farm assessments; and the heavy reliance on Agricultural Sustainability Support and Advisory Programme (ASSAP).
- **Public Engagement and Awareness -** Key issues raised included the inadequate public participation measures in the plan; need for a comprehensive, transparent, and participative public engagement programme; role for citizen science programmes and community involvement with provision of appropriate funding for same; and the need for simple and effective complaints channel for the public to report any pollution event. The importance of education in relation to water quality, agricultural practices, and invasive species was also raised in submissions.
- **Local Authority -** A lot of issues were highlighted in relation to the Local Authorities including lack of funding; lack of adequate resourcing; availability of training to deliver necessary measures; role of Local Authorities to sustain, drive, fund, and coordinate community involvement; development and implementation of the proposed catchment management plans.
- **Level of ambition -** The key issues raised on this issue in the submissions was that the level of ambitions in the plan is considered inadequate. It was noted that there is a need for measures to be more targeted, measurable, timebound and based on more Key Performance Indicators (KPIs). More focussed targeted climate change measures dealing with flooding, sea level rise and storage/reservoirs along with coastal specific measures were also recommended.
- **Sewage Pollution -** Key issues raised included the onerous and strict nature of the grant application process for domestic waste water treatment system (DWWTS); more investment and inspectors for proper inspection of all the malfunctioning DWWT setups; the need for the Irish Water Investment Plan to end sewage pollution from all the waste water treatment plants identified as the main pollution source; and the urgent need for upgrade or replacement of specific WWTP was noted.
- **Department / Agency –** Key issues included the need for every department/agency to carry out an internal review in respect of its role under the RBMP; the RBMP must ensure that a joined-up approach is taken to the preservation of water quality and waste water management; a single lead agency must be identified and resourced adequately to monitor and uphold key performance metrics for successful implementation of the plan.
- **Co-ordination -** Key issues were the need for greater coordination among the implementation bodies in particular Local Authorities and the Department of Agriculture, Food and the Marine (DAFM); the imperative of policy coherence between water, climate and biodiversity plans and measures; clarity on the responsibilities of different stakeholders towards the improvement of water quality; requirement for a strong collaborative approach; and the need to work positively with the farming sector to deliver improvements in water quality.
- **Funding –** References were related to the significant need for appropriate funding and resourcing to deliver necessary measures.
- **Forestry –** Key issues included the requirement for WFD specific assessment and site-specific conditions for all planting and felling licences in the forestry sector.
- **Peat –** Requirement for a list of all waterbodies that have been impacted by peat extraction to be included in the plan, need for peat-specific targets, prohibition of wetland drainage, need for a National Wetland Restoration Plan; and incentives and grants to support such measures.

- **Shellfish waters / aquaculture -** Better integration for shellfish waters / aquaculture in the plan; need for all potential pressures from aquaculture to be included in the plan and need for effective monitoring to be put in place.
- **Other -** Requirement of restoration programme including re-meandering, re-establishment of natural riparian zones etc.; urgency to halt the release of hazardous substances into waterbodies; constant need for compliance assurance and need for proper monitoring to track the progress of plan implementation etc.

The full consultation summary report is presented in **Appendix 2** of this report.

Following review of the submissions and informed by the extensive stakeholder engagement under the WFD noted in section 5.1, the DHLGH updated the draft RBMP. The material changes made are presented in Section 5.3 and have been assessed under both the SEA and AA processes to determine if any changes could result in additional significant effects, not previously identified in the pre-consultation assessments.

5.2.1 Consultation Feedback on the SEA and AA Documents and Processes

The following is a summary of issues raised specifically on the SEA and AA documentation and processes and how they have been addressed.

Table 5-1: Issues Raised in relation to SEA

Issue / Comment Raised	How this has been addressed
Comments related to SEA	
Section 2.6 of the draft plan should also clearly address how the findings of the SEA Environmental Report have been integrated in the Plan. Any future amendments to the Plan should be screened for likely significant effects, using the same method of assessment applied in the "environmental assessment" of the Plan.	Chapter 5 of the final plan notes that a full list of mitigation measures taken from the SEA and Natura Impact Statement (NIS) that apply to the Programme of Measures can be found in the accompanying appendices to the plan. In addition, this SEA Statement includes information in Chapters 4 and 5 on how the SEA process and stakeholder feedback have influenced the plan.
Chapter 8 of the SEA Environmental Report includes an extensive list of detailed mitigation measures. It is important that the recommendations of the SEA Environmental Report are fully integrated into the Plan, or if not the case, an explanation provided as to the reasons for not including them. Likewise, the mitigation measures from the appropriate assessment should be integrated into the Plan. The Plan should also provide a clear indication of how these mitigation measures will be implemented.	Section 4.2 of this SEA Statement provides details of how mitigation has been applied in the final plan and responses from the DHLGH are also provided.
If the monitoring identifies adverse impacts during the implementation of the Plan, DHLGH should ensure that suitable and effective remedial action is taken. The implementation of the Plan should include provisions for annual reporting on implementation of the Programme of Measures. The Plan implementation, monitoring and reporting should be aligned with the environmental monitoring and reporting required under the SEA legislation.	An enhanced programme of formal and scheduled monitoring and reporting of progress in respect of the implementation of the RBMP has been committed to. This will be assisted with the implementation of the 46 Catchment Management Work Plans and supporting Sectoral Action Work Plans, as sub-plans to the national Plan. In addition, monitoring will also be included under the SEA monitoring programme which will form part of the wider monitoring strategy for the RBMP.

Issue / Comment Raised	How this has been addressed
The SEA Environmental Report discusses all of the relevant issues extensively. The inclusion of the SEA objectives in tabular form which clearly shows how the objectives are linked to each of the SEA topics as well as the UN Sustainable Development Goals is welcomed. There is merit in also considering SDG Goal 3: Good Health and Wellbeing and the relevant links with the Plan.	SDG3 is included where relevant to show the links with the Plan in Table 6-2 of the SEA ER in the manner as for the other SDGs.
The links in the baseline information of the SEA ER to the EPA State of the Environment Report (SOER) 2020 is welcomed. However, the baseline can be further strengthened through references to the baseline information from the previous two river basin management cycles. The use of data from the previous cycles would present a clearer picture of trends for key environmental receptors. The baseline should be updated with reference to the new EU Soils Strategy and its relevant objectives which has been published in the interim since the public consultation commenced.	See Chapter 8 of this statement for the Addendum to the SEA Environmental Report.
There may be merit in identifying the key relevant policies and plans in the main text of the document and including the other relevant plans as an appendix to the report. This would enable the Environmental Report to identify which policies and plans are likely to have significant impacts and so which proposed mitigation measures are the most important measures with respect to the Plan.	The key relevant policies are included in Chapter 4 of the SEA report with an additional Appendix A with a more comprehensive list.
It was noted that in Table 5- Inter relationships between SEA topics, the SEA ER fails to recognise the important relationship between cultural heritage and biodiversity. Many heritage assets provide areas of key habitat in themselves or secondarily through their influence on surrounding landscape character. In the riverine, or canalised environment bridges, banks and historical wreckage can provide discrete areas of special habitat.	See Chapter 8 of this statement for the Addendum to the SEA Environmental Report.
It is recommended that in relation to monitoring the effects of the implementation of the plans be considered against appropriate monitoring measures in relation to both water quality and resource. It is essential that associated trigger actions and interventions (including plan revisions where required) are undertaken if any unforeseen or adverse environmental effects to the aquatic environment are identified as a result of the plans.	The proposed monitoring programme included in the Environmental Report identifies remedial actions for all parameters to be monitored. The environmental monitoring programme will be integrated into the wider governance and implementation proposed for the RBMP. This includes for example: A National Oversight and Audit Commission (NOAC) which will include appropriate water quality metrics in Key Performance Indicators for local authorities during the next review of indicators.

Issue / Comment Raised	How this has been addressed
	The Catchment Management Work Plans which will include the list of waterbodies, their associated status, significant pressures/issues and targeted measures, along with outcomes-based targets for the third cycle and key performance indicators to monitor progress and outcomes. Justification for waterbodies not meeting their WFD objective by 2027 should also be included in catchment management plans, in line with Article 4 of the WFD.
SEA Scoping Report (Pg. 112) fails to include a reference to the National Monuments Service's Wreck Inventory of Ireland Database which contains the historical record of all historic wrecks within Irish waters. This should be included.	See Chapter 8 of this statement for the Addendum to the SEA Environmental Report.
Appendix A 'Regional level plans & programmes' 'water and wastewater' should include the 'UK Fisheries Act 2020' - a legal requirement for the UK's four national	See Chapter 8 of this statement for the Addendum to the SEA Environmental Report.
Fisheries policy authorities (Marine Management Organisation (MMO), Scottish Ministers, Welsh Ministers, and the Northern Ireland department) to produce a Joint Fisheries Statement (JFS) that will lay out how these objectives will be met. The Act requires these authorities to produce the JFS within two years of the Fisheries Act being passed. This act will form the basis of any changes to the Fisheries Act (NI) 1966.	See Chapter 8 of this statement for the Addendum to the SEA Environmental Report.
Appendix A - 'Regional level plans & programmes' under 'cultural heritage' should be 'Protection of military remains Act 1986' – An Act to secure the protection from unauthorised interference of the remains of military aircraft and vessels that have crashed, sunk or been stranded and of associated human remains, and for connected purposes.	See Chapter 8 of this statement for the Addendum to the SEA Environmental Report.
It is worth noting under 5.2.1.4 of the SEA reports that IFI is the primary body for management of certain sport fish and freshwater species of fish. The DAFM holds responsibility for sea fishing.	See Chapter 8 of this statement for the Addendum to the SEA Environmental Report.
The SEA ER recommends that a mid-term review of the overall progress on implementation of the Plan measures be undertaken. This would be a key means of evaluating the progress towards implementing the programme of measures and achieving the objectives in the Water Framework Directive.	See Section 4.2 of this report for how mitigation has been taken on board for the RBMP.

Issue / Comment Raised	How this has been addressed
The SEA ER should reflect the alignment and consistency between the objectives of the National Planning Framework (in particular National Policy Objectives 50, 52 and 571), the three Regional Spatial and Economic Strategies and the River Basin Management Plan.	It is noted that the NPF is currently under revision. It will have regard to the draft RBMP in revising policy relevant to NPO 50, 52 and 57. SEA and AA are also ongoing on the NPF and will seek the alignment and consistency sought this will in turn tier down to the RSES when they are being updated in the near future.
Both SEA ER and the Plan would benefit from the inclusion of a schematic showing the hierarchy and inter relationships of the other relevant plans and programmes, e.g., Nitrates Action Programme, Irish Water plans, etc.	Figure 1 of the final Plan includes WFD Interaction with Other EU Legislation, along with a section on relationships to other plans. See Chapter 8 of this statement for the Addendum to the SEA Environmental Report.
The analysis of the alternatives would benefit from referring to the alternatives considered under the environmental assessment of the second cycle RBMP and how they differ to those considered under the current proposed iteration so that the learnings from previous cycles can be applied.	See Chapter 8 of this statement for the Addendum to the SEA Environmental Report.
A number of mitigation measures refer to the requirement for further plans (e.g., Rural Waters Strategic Plan, Integrated Catchment Management Plans, Water Services Strategic Plan) to undertake SEA and appropriate assessment screening. It is important that DHLGH and relevant plan making authority(ies) consider the requirements of the SEA Regulations (S.I. 435 of 2004, as amended) and the Habitats Directive, early, in the plan-preparation process.	See section 4.2 for DHLGH response to mitigation requirements.
The Monitoring Programme should be flexible to take account of specific environmental issues and unforeseen adverse impacts should they arise during implementation. The monitoring programme should set out the various data sources, monitoring frequencies, responsibilities and reporting. Some of the parameters included in the SEA Environmental Report for monitoring do not have data sources, e.g., peat, soils. This should be addressed before a final monitoring programme is agreed.	The DHLGH have included proposed monitoring under Chapter 6 of their final plan. It is noted it does not integrate the proposed monitoring programme from the SEA.

5.3 Assessment of Final Changes to the Draft RBMP post-Consultation

This section records the amendments made to the draft RBMP following consultation and the assessment under the SEA. Each section below contains the assessment of changes made to the final Plan. In many

cases, the amendments proposed reflect addition of measures previously proposed in the SEA Environmental Report, the NIS on the draft RBMP and extensive stakeholder feedback on ways to strengthen the RBMP in the context of protecting the wider environment.

5.3.1 The Importance of Protecting our Natural Waters

RBMP Action No.	Draft RBMP Action No. and Wording	Final RBMP Action Wording	Assessment of Effects and Requirement for Mitigation
1.1	*New action arising following Public Consultation*	Integrated catchment management approaches will be used to identify and decide on further specific measures for each water body, where they are required in addition to those set in this plan. These will be included in the 46 Catchment Management Work Plans, which will be used to locate measures within each catchment. The co-benefits of water-focused measures on climate and biodiversity will also be identified.	The key activity in relation to this action is the adoption of an integrated catchment management approach to identify and decide on further specific measures for each water body, where required. This includes the coordination of the Sectoral Action Work Plans and subsequent Catchment Management Work Plans, the inclusion of proposed measures within same and reporting of measures at water body scale. This is considered broadly positive for all environmental receptors as taking an integrated catchment management approach will address water quality issues effectively. **No significant negative effects** identified on any of the environmental factors as a result of this new action.
1.2	*New action arising following Public Consultation*	The Catchment Management Work Plans will include the list of water bodies, their associated status, significant pressures/issues and targeted measures, along with outcomes-based targets for the third cycle and key performance indicators to monitor progress and outcomes. Justification for water bodies not meeting their WFD objective by 2027 should also be included in catchment management work plans, in line with Article 4 of the WFD.	The key activities in relation to this action include the coordination of the preparation of the 46 Catchment Management Work Plans through regional committees, dissemination of the work plan template, and the provision by implementing bodies of reporting (work programmes, action plans, local authority water action plans) for online reporting in the 46 catchments. This is considered broadly positive for all environmental receptors. As noted in Action 6.1 [Action 2.4(1) in the draft plan], the Catchment Management Plans will be screened for AA. **No significant negative effects** identified on any of the environmental factors as a result of this new action.
1.3	*New action arising following Public Consultation*	Sectoral Action Work Plans will be developed. They will set out the actions to be taken by the relevant authorities in line with their legally binding general duties under Article 3(1) of the 2003 Water Policy	The key activity relates to the development of Sectoral Action Work Plans. This will include the re-establishment of the Programme of Measures working group, template development and engagement by

		Regulations (SI 722 of 2003).	each sector in the preparation of the plans. This is considered broadly positive for all environmental receptors. **No significant negative effects** identified on any of the environmental factors as a result of this new action.
1.4	*New action arising following Public Consultation*	When developing new policy, Government Departments will have regard to the OECD principles[3] for policy coherence to consider cross-cutting issues; trade-offs and synergies with other key policy objectives.	The key activity in relation to this action is having regard to OECD principles for policy coherence when developing new policy. This is considered broadly positive for all environmental receptors. **No significant negative effects** identified on any of the environmental factors as a result of this new action.

5.3.2 The Status of Ireland's Water Bodies

RBMP Action No.	Draft RBMP Action No. and Wording	Final RBMP Action Wording	Assessment of Effects and Requirement for Mitigation
2.1	*New action arising following Public Consultation*	The DHLGH shall continue to engage with counterparts in Northern Ireland via the North/South Water Framework Directive Co-ordination Group as is necessary to ensure coordination of programmes of measures across the whole of shared river basin districts.	The key activity will be engagement with counterparts in NI to ensure cooperation for water bodies that flow into or through both jurisdictions. This is considered broadly positive for all environmental receptors as it will ensure alignment on achieving objectives under the WFD, Nature Directives and other inter-related environmental legislation. **No significant negative effects** identified on any of the environmental factors as a result of this new action.
2.2	**Action 2.2(1):** In cooperation with our northern colleagues, DHLGH will prepare a "shared waters" document that will outline the water bodies that flow into or through both jurisdictions and the work to be undertaken to ensure they meet their environmental objectives as reported in the River Basin Management Plans for Ireland and Northern	A collaborative 'Shared Waters' document will be published following publication of the River Basin Management Plans of the Republic of Ireland and Northern Ireland.	Action previously assessed as **Action 2.2(1)** in draft RBMP SEA Environmental Report. Text has been refined but action remains the same. **No significant negative effects** identified on any of the environmental factors as a result of this refinement.

[3] OECD (2019), Recommendation of the Council on Policy Coherence for Sustainable Development, OECD, Paris.

	Ireland.		

5.3.3 Setting Environmental Objectives

RBMP Action No.	Draft RBMP Action No. and Wording	Final RBMP Action Wording	Assessment of Effects and Requirement for Mitigation
3.1	*New action arising following Public Consultation*	DHLGH will arrange for the development and application of a methodology for the screening and application of WFD Article 4(5) exemptions, extending the deadline for compliance beyond 2027, where justified in accordance with the strict criteria stipulated within the Directive.	The key activity in relation to this action is the commissioning and development of a methodology for the screening and application of WFD Article 4(5) exemptions. Article 4(5) exemptions must be subject to satisfying strict criteria, where avoidance, substitution, mitigation and management are not feasible. Consideration must also be given to the interrelationship between the Water Framework Directive and the Habitats Directive. Developing of a methodology is considered broadly positive for all environmental receptors. **No significant negative effects** identified on any of the environmental factors as a result of this new action.
3.2	**Action 3.4(2):** Update the Climate Adaptation Plan for the Water Quality and Water Infrastructure Sectors	DHLGH will review and update the Climate Adaptation Plan for the Water Quality and Water Infrastructure Sectors.	Action previously assessed as **Action 3.4(2)** in draft RBMP SEA Environmental Report. **No significant negative effects** identified on any of the environmental factors as a result of this update.
3.3	**Action 3.4(1):** To ensure that the actions selected are effective, sustainable and cost efficient under changing conditions, a "climate check" will be required for all measures carried out under this plan.	LAWPRO will co-ordinate a simplified climate change sensitivity analysis or "climate check" which will be undertaken in line with EU Guidance during the third RBMP cycle at the level of Catchment Management Work Plans. The check will also inform the setting of RBMP environmental objectives for the following fourth cycle.	The key activity for this action is climate change sensitivity analysis for all measures carried out under the plan which is considered broadly positive for all environmental receptors as it acknowledges the dynamic nature of environmental conditions in the context of climate change and climate sensitivity to be integrated into decision making Climate change has the potential for a number of effects on environmental receptors, notably deteriorations in air quality, alteration to flood risk, deterioration in quality of bathing / recreational waters, deterioration in drinking water quality, all with impacts on PHH, W and MA. BFF is also at risk from climate change with potential to alter river flows and quality and the functioning of water-dependent habitats; which will have direct and indirect effects for BFF which may be dependent on the habitat. There is also potential to impact to habitats and

			species related to groundwater dependant ecosystems through changes in groundwater quantity or quality. Changes in concentration of pollutants, availability of suitable habitat for resting, breeding, changes in species dynamics and increased success for invasive species may result from the effects of climate change. This review itself will be positive, ensuring that the climate change effects relevant to protection of the environment can be considered in the context of the Catchment Management Work Plans to be prepared. However, the sensitivity analysis must explicitly consider the potential for changes in population ranges and dynamics if negative effects on environmental receptors are to be avoided.
3.4	**Action 3.4(3):** Examine opportunities in the monitoring programme to improve our understanding of climate change trends.	The EPA will review the national monitoring programme and integrate climate change considerations such as identifying water bodies likely to be most vulnerable to climate change and detecting the direct impacts of climate change.	The key activity for this action relates to refining the national monitoring programme to integrate climate consideration. This is considered broadly positive for all environmental receptors. **No significant negative effects** identified on any of the environmental factors as a result of this amendment.
3.5	**Action 3.4(4):** Support additional research and pilot projects in the area of climate change.	Support additional research in the area of climate change in Ireland (impacts and adaptation).	Action previously assessed as **Action 3.4(4)** in draft RBMP SEA Environmental Report. **No significant negative effects** identified on any of the environmental factors as a result of this amendment.
3.6	**Urban Runoff 3**The National Bathing Water Expert Group to undertake a project to determine the most suitable approach to protecting bathers' health outside of the current bathing season in Dublin Bay	The National Bathing Water Expert Group to undertake a research project to determine the most suitable approach to protecting bathers' health outside of the current bathing season.	Action previously assessed as **Urban Runoff 3** in draft RBMP SEA Environmental Report. **No significant negative effects** identified on any of the environmental factors as a result of this amendment.
3.7	**Urban Runoff 4:** DHLGH to amend the existing Bathing Water Regulations (S.I. No. 79 of 2008) to provide discretion to local authorities on determining the bathing season for	DHLGH will amend the existing Bathing Water Regulations (S.I. No. 79 of 2008) to facilitate local authorities defining the length of the "bathing season" on determining the bathing season for individual bathing	The key activities for this action relate to provision of discretion to local authorities to determine the length of bathing season for individual bathing waters and review of Bathing Water Directive in due course. This is considered positive for PHH, MA and W, as this amended legislation would allow

	individual bathing waters.	waters in respect of the "bathing waters" within their jurisdiction. DHLGH will also consider the research outcomes and recommendations from the National Bathing Water Expert Group. The outcome of the EU regulatory fitness and performance programme (REFIT) review of the Bathing Water Directive will be assessed in due course.	for more flexibility and would take account of local variations in terms of when people generally are taking advantage of bathing seasons for particular waters. The review of review of Bathing Water Directive is considered broadly positive for all environmental receptors. **No significant negative effects** foreseen on any of the environmental factors as a result of this new action.
3.8	*New action arising following Public Consultation*	The water-related requirements of water-dependant habitats and species will be reviewed by the Water Division, the National Parks and Wildlife Service and the EPA during the 3rd RBMP cycle, taking account of the most recent scientific evidence. If necessary, proposals for updating the related water standards will be made and this will be integrated into the catchment management process.	The key activity in relation to a review of the water-related requirements of water-dependent habitats and species, to include the most up-to-date scientific information. This will have direct and indirect positive effects for BFF and W in particular as it will improve the decision making by applying most recent scientific evidence and implement adaptive management in response.
3.9	*New action arising following Public Consultation*	The National Parks and Wildlife Service and the Water Division, both of this Department, and other relevant stakeholders will continue to engage closely in the catchment management planning process as it relates to Freshwater Pearl Mussel to ensure conformity with the requirements of the Habitats Directive and the Water Framework Directive.	The key activity in relation to this measure is the engagement of key stakeholders during the catchment management planning process to ensure that the requirements of the Habitats Directive and the Water Framework Directive are included. This will have direct and indirect positive effects for BFF and W in particular as it will ensure a robust management response to support FPM.
3.10	**Action 3.3(1):** Undertake a technical review and public consultation on the designation of Heavily Modified Water Bodies.	The Minister for Housing, Local Government and Heritage will undertake a short public consultation before deciding whether to designate or de-designate water bodies as HMWBs. There were 466 water bodies, which the EPA has found to meet the criteria for designation. The Minister will take into account the recommendations of the EPA and the key concerns raised in the submissions to the	The key activity for this action is the addition of a public consultation to supplement the technical EPA recommendations. The addition of a public consultation is positive for PHH and MA as it improves overall engagement on environmental decision making. Notwithstanding that, the action is not clear on criteria or process for de-designation. Without consideration of the impacts of designation and / or de-designation may have indirect environmental consequences. **Mitigation:** Criteria need to be

		consultation process.	established and consulted on.
3.11	*New action arising following Public Consultation*	A review of arterial drainage requirements and the underpinning Arterial Drainage Act will be undertaken in order to inform future land use policy decisions arising out of the Land Use Review and to support the preparations for the implementation of the new Nature Restoration Law and the Heavily Modified Water Body review process.	The key activities in relation to this action are an assessment and review of the implications of different land use policy options arising from the Land Use Review on arterial drainage requirements; and assessing and advising on legislative changes to the Arterial Drainage Act to support national land use policy and ensure that future arterial drainage practices are sustainable and support the environmental objectives set out in the 2021 Climate Action Plan, the River Basin Management Plan, the National Biodiversity Action Plan and the related Nature Restoration Law, as well as flood risk management objectives. The review is considered broadly positive for all environmental receptors.

5.3.4 Measures Required

RBMP Action No.	Draft RBMP Action No. and Wording	Final RBMP Action Wording [Blue text / strikethrough denotes significant changes]	Assessment of Effects and Requirement for Mitigation
4.1	**Action 3.1(1):** Measures to be put in place to ensure the additional evidence required to determine if water bodies are 'At Risk' can be obtained.	The EPA and LAWPRO, with the support of the implementing bodies and other stakeholders, will continue to assess the impacts of pressures on waters to inform the measures that are needed.	The key activity are measures to ensure additional evidence base. While measures are not specified, this characterisation is essential to identifying appropriate actions to deliver improved water quality, which will have direct positive impacts for and indirect positive impacts for water-dependent BFF.

5.3.5 Programme of Measures to 2027

5.3.5.1 Overview of the Programme of Measures

5.3.5.1.1 How We Protect and Restore Water

RBMP Action No.	Draft RBMP Action No. and Wording	Final RBMP Action Wording	Assessment of Effects and Requirement for Mitigation
5.1	**Action 2.4(3):** The Department along with the governance groups (WPAC, NCMC and NTIG)	The Department of Housing, Local Government and Heritage will oversee an independent review of	The key activity is continuous review of implementation of the Programme of Measures. This is considered positive for all as it will allow for progress to be

	will continually review the progress in the implementation of the programmes of measures and the distance to the 2027 target.	progress with the implementation of the Programme of Measures.	tracked and interventions made if measures are not being delivered. **No significant negative effects** identified on any of the environmental factors as a result of this new action.
5.2	**Protection 1:** Working Group to be established under the National Technical Implementation Group to examine the implementation of current legislation governing activities which pose a risk to waters and to identify opportunities to improve compliance with it.	The National Technical Implementation Group will identify the issues preventing water quality objectives from being achieved and will identify any further evidence, legislative, policy or implementation gaps that need to be addressed.	The key activity will be the identification of issues causing declines in water quality and the examination of the implementation of current legislation focussed on water protection, including gaps that need to be addressed to prevent declines. This is considered positive, particularly for W, as it will allow for continuous improvements towards achieving water quality objectives. **No significant negative effects** identified on any of the environmental factors as a result of this new action.
5.3	**Areas for Action 1**: Restoration works to be advanced in 427 areas where environmental objectives are not being met.	LAWPRO will confirm significant pressures and work with implementing bodies and stakeholders to promote the implementation of appropriate restoration measures in each Area for Action (restoration) where environmental objectives are not being met.	Restoration works are likely to include improvement to natural flood alleviation, riparian improvements, replacing hard infrastructure with a non-structural solutions, removals of weirs etc. all with the intention of returning rivers to as close to their natural state as possible. Broadly restoration measures are positive, particularly for W, BFF and LS as a more natural state is achieved however, there is potential for negative effects on a range of environmental receptors including PHH, BFF, LS, L, MA, and CH where impact pathways are not recognised and accounted for in the restoration measures proposed. Actions could lead to impacting on existing land uses, existing access arrangements, visual intrusion, disturbance of natural or built heritage features, increased flood risk to properties, changes in population dynamics, spread of invasive species and reduced ecological connectivity etc. To avoid negative effects on the environment resulting from the proposed restoration works, works programmes and projects the DHLGH will develop a process to ensure that support, funding and coordination of such works and projects undergoes a risk assessment (carried out by LAWPRO or similar) with regard to likely significant effects on the environment. The risk assessment will include early engagement with the AA process.

			Given that this is locally driven, the most appropriate stage at which to undertake risk assessments is at the LAWPRO level where ecological and environmental expertise to support communities is in place to undertake the assessments. These assessments must have regard to relevant Catchment Management Plan(s) and mitigation provided in associated SEA and/or plan level AA. This will ensure a more coordinated approach to local actions which is broadly positive for all the environmental receptors. The DHLGH will ensure that there is awareness raising and training associated with any restoration works, works programmes and projects to ensure the potential for effects on the environment, including any European site are understood more widely.
5.4	**Areas for Action 2:** Protection measures to be progressed in 85 areas that are meeting their environmental objectives but require protection to ensure their water quality does not deteriorate.	LAWPRO will confirm significant pressures and work with implementing bodies and stakeholders to progress the implementation of appropriate protection measures in areas that are meeting their environmental objectives but require protection to ensure that water quality does not deteriorate.	The existing work programme for protections measures in areas that are meeting their environmental objectives but require protection to ensure that water quality does not deteriorate include Section 4 licences and DWWTS inspections and additional work under Water Pollution Act. Implementation of appropriate protection measures by LAWPRO and other relevant stakeholders is considered to be directly positive for W and BFF as this action contributes towards the achievement of WFD objectives. **No significant negative effects** identified on any of the environmental factors as a result of this new action.
5.5	**Areas for Action 4:** The Blue Dot Programme to draft a detailed work plan for waters with a High-Status Objective, with a view to them forming part of the proposed local catchment plans.	LAWPRO, in cooperation with the EU LIFE IP Waters of LIFE project team, will publish a new Blue Dot Programme work plan for waters with a High Status Objective.	The key activity will be the publication of a new Blue Dot Programme work plan for High Status objective waters by LAWPRO and Waters of LIFE project team. This is considered to be broadly positive for all environmental receptors, particularly for W and BFF as it will continue to raise awareness and promote protection and restoration of these waterbodies. **No significant negative effects** identified on any of the environmental factors as a result of this new action.
5.6	**Areas for Action 3**: Catchment projects aimed at improving water quality to be advanced in 15	Catchment projects aimed at improving water quality to be advanced in 15 areas (including community	The key activity will be to progress the catchment projects including existing large-scale, community led initiatives and projects or research ongoing within

	areas.	initiatives, Rivers Trusts, EIPs, PEACE+).	a catchment. This is considered to be broadly positive, particularly for W, BFF and LS. However, there is potential for negative effects on a range of environmental receptors including PHH, BFF, LS, L, MA, and CH where impact pathways are not recognised and accounted for in the proposed projects. Depending the nature and scale of the projects, they may require screening for SEA / EIA and AA. Possible impact pathways include impacting on existing land uses and existing access arrangements, visual intrusion, disturbance of natural or built heritage features, increased flood risk to properties, changes in population dynamics, spread of invasive species and reduced ecological connectivity etc.

5.3.5.2 Environmental Measures

5.3.5.2.1 Agriculture

RBMP Action No.	Draft RBMP Action No. and Wording	Final RBMP Action Wording	Assessment of Effects and Requirement for Mitigation
Agri 1	**Agriculture 1:** GAP Regulations - The existing GAP Regulations are due to expire and be replaced at the end of 2021. The Nitrates Expert Group is working on the development of the new Nitrates Action Programme, which will be implemented by the regulations. It is expected that the new NAP will: Retain the existing controls on Nitrogen and Phosphorous from agriculture. Implement tighter controls on nitrogen and phosphorus inputs by: Establishing a chemical fertiliser register for farmers Providing for enhanced programmes of enforcement. Stipulating tighter controls on the use of chemical nitrogen fertilisers focussed on critical source areas Incorporate an industry-led initiative to reduce agricultural impacts on water quality.	DHLGH and DAFM will oversee the implementation of the stronger and more targeted Nitrates Action Programme. The Fifth Nitrates Action Programme (2022-2025) retains and strengthens the existing controls from agricultural nutrient impacts on water and will implement tighter controls on nitrogen and phosphorus inputs by: 1) Stipulating tighter controls on the timing and methods of application of chemical nitrogen fertilisers and slurry. 2) Reducing the annual maximum fertilisation rate of nitrogen on grassland by 10% in 2022 with potential for a further reduction of, at least, 5% in 2024 following the Interim Review in 2023. 3) Reduction in the maximum derogation stocking rate on farms in waterbodies where there is, or a risk of, declining water quality.	Nutrient loses to water remain one of the most significant pressures on water quality nationally with the EPA identifying the two main sources as agriculture and wastewater. The SWMI consultation noted that nutrient loss is most common in freely draining soils, where it leaches readily to groundwater before being discharged into river systems and onwards to estuaries and coastal waters where it causes water quality problems. In the freely draining catchments, nitrate losses are closely correlated with farm intensity: the higher the application of nitrate to land, the higher the nitrate concentrations in waters. Nitrogen (and phosphorus) losses from such catchments will continue to rise unless controlled. These nutrient losses in addition to impacting water quality can also impact on the favourable conservation status of water-dependant European sites.

		4) Implementing a livestock excretion banding system from Q1 2023 to more accurately reflect the different rates of organic nitrogen loading from different sized animals in the maximum stocking rate calculations. 5) Establishing a national fertiliser sales database for farmers.	The GAP Regulations are intended to provide the control with regard to nutrients however, the most recent monitoring results from the EPA indicate that trends in terms of nutrient pollution are not going in the right direction, partly as a result of the ongoing expansion of the agriculture sector under Food Wise 2025 and its successor. A new NAP has been prepared and includes more measures such as: 1) Stipulating tighter controls on the timing and methods of application of chemical nitrogen fertilisers and slurry. 2) Reducing the annual maximum fertilisation rate of nitrogen on grassland by 10% in 2022 with potential for a further reduction of, at least, 5% in 2024 following the Interim Review in 2023. 3) Reduction in the maximum derogation stocking rate on farms in water bodies where there is, or a risk of, declining water quality. 4) Implementing a livestock excretion banding system from Q1 2023 to more accurately reflect the different rates of organic nitrogen loading from different sized animals in the maximum stocking rate calculations. 5) Establishing a national fertiliser sales database for farmers. The actions arising from the new NAP have potential for significant adverse effects on European sites; particularly mindful of nutrient loss to water from agriculture is one of the most significant pressures on water quality in Ireland. The 5th NAP was subject to AA and SEA in its own right and includes mitigation measures for the avoidance of impact to European sites that must be adhered to. It is also required to

			be cognisant of the RBMP; including the mitigations identified within this NIS for the RBMP. An interim review of the 5th NAP is underway and is responding to the latest water quality information from the EPA. This NAP review is also the subject of an SEA and AA processes which have not yet concluded. A key issue for the assessments is nitrates derogations for over 5000 derogation farms as well as wider management and governance issues in terms of inspections. The outcomes of the NAP review SEA and AA will need to be fully implemented. In the short term, risk assessment around the selection of farms to be inspected has been improved and water considerations have been brought into that risk assessment process. In addition, inspections have increased from 5% to 10% per annum [see **Agri 2** below]. As outlined above, reduction in the maximum derogation stocking rate on farms in proximity to water bodies where there is (or is a risk of) declining water quality is required. Decision-making must utilise the science presented by the EPA in their Catchments of Concern assessment[4]. No additional mitigation required under RBMP subject to full implementation of any mitigations identified in the SEA Environmental Report and NIS for the Interim NAP.
Agri 2	**Agriculture 6:** Local authorities and the EPA, through the NIECE network, will ensure that compliance assurance (including enforcement) actions for agricultural activities will be further enhanced and ensure that there is an increased	Local Authorities will strengthen the inspection and enforcement relating to agricultural diffuse pollution. A total of 57 new Inspectors in local authorities have been allocated for the National Agricultural Inspection Programme (NAIP) and five new	The key activity will be increased enforcement and inspections which is broadly positive for PHH, W, BFF, and LS in particular. Noting that inspection and enforcement are already a key element of the existing legislation and regime,

[4] EPA 2021. Assessment of the catchments that need reductions in nitrogen concentrations to achieve water quality objectives. WFD River Basin Management Plan – 3rd Cycle.

	targeting of inspections by local authorities based on water quality results, critical source areas and the EPA's PIP Maps.	staff have been allocated to the EPA to oversee the programme. An additional four staff have been allocated to LAWPRO to help in co-ordinating the activity and avoiding duplication where possible. Inspections will be targeted and risk-based using all the available evidence, including water quality data, the EPA's PIP Maps and the Targeting Agricultural Measures Map on up to 4,500 farms per annum during the lifetime of the Nitrate Action Programme. DAFM will undertake 500-1,000 inspections per year under the GAP Regulations focused in Q1 where risk of nutrient impact on water quality is high. DAFM has increased their derogation inspections from 5% to 10% of all derogation farms per year and will undertake approximately 700 inspections per annum.	the resources applied are critical to achieving success. It is noted the proposed level of inspection is increasing from a low base and more are needed to confirm compliance where issues are found. The effectiveness of the inspection and remedial actions applied is also an essential element to the overall success of this measures and must be continuously reviewed in order to generate a positive outcome for water quality.
Agri 3	**Agriculture 2:** CAP Strategic Plan - New Rural Development Programme Regulations under the National CAP Strategic Plan will underpin the establishment of a new green architecture that aims to deliver and reward positive environmental outcomes, including water, biodiversity and climate mitigation and adaptation objectives.	DAFM will implement Ireland's CAP Strategic Plan with a strong emphasis on the achievement of a higher level of environmental ambition. This includes implementing the new Green Architecture of (1) Conditionality, (2) Pillar I Eco-Schemes and (3) the Pillar II Interventions such as ACRES and the new Water EIP.	The CAP Strategic Plan was subject to both SEA and AA. No additional mitigation required under RBMP subject to full implementation of any mitigations identified in the SEA Environmental Report and NIS for the CAP Strategic Plan.
Agri 4	*New action arising following Public Consultation*	Eco-scheme measures will contribute to the protection of water quality. DAFM will promote and target the uptake of these measures in locations at farm level where they will maximise water protection. This will be achieved through training and farm advisory services and by using the Pollution Impact Potential (PIP) maps generated by the EPA.	The key activity in relation to this measure is the delivery of advisor training and promotion of the use of EPA PIP maps to target the right measure in the right place. This will increase the efficiency of measures within eco-schemes that contribute to the protection of water quality by increasing the knowledge base around targeting of measures with direct and indirect positive effects for W, BFF, PHH and MA.
Agri 5	*New action arising following Public Consultation*	The Water EIP project led by LAWPRO, in partnership with	The key activity relates to the delivery of the 'Farming for

		Teagasc and Dairy Industries Ireland will focus on reducing losses of phosphorus, nitrogen, sediment and, where relevant, pesticides to water from agricultural lands by promoting the adoption of innovative best practice in nutrient management, the application of Nature based Natural Water Retention Measures (NWRM) and other suitable measures. The project will aim to support up to 15,000 farmers in implementing on-farm water protection and mitigation measures.	Water' EIP which aims to support farmers in implementing on-farm water protection and mitigation measures, and also measures to support climate, environment and biodiversity. The Water EIP provides a €60m investment as part of the government's commitment to support farmers in achieving water quality improvements. Through this project, LAWPRO will work with farmers on an individual basis to improve water quality. While this will have direct and indirect positive effects for PHH, W, BFF, MA and LS as a result of increased investment and focus, the source of sufficient expertise as envisaged by the Water EIP Guidelines Document is not clear. While increased resources are noted under Agriculture 6, these are for increased inspections and enforcement generally and would not be suitable to cover the individual basis suggested in this action. It should be clarified that the necessary resources do this action would be additional to those in Agriculture 6. Depending the nature of the measures designed by the Water EIP they may require screening for SEA / EIA and AA.
Agri 6	*New action arising following Public Consultation*	DHLGH and DAFM will put arrangements in place to ensure independent assessments and reviews of the efficacy of the Nitrates Action Programme (NAP), the CAP Strategic Plan and the Water EIP (and other relevant measures) to bring the 1,000 waterbodies impacted by agriculture up to good status and to prevent deterioration. They will identify additional measures, where necessary, which will be implemented during the lifetime of the plan or beyond, where justified under Article 4 of the WFD. Mechanisms for review will include: DHLGH monitoring & assessment of progress with the	The key activity in relation to this measure is to put arrangements in place to ensure independent assessments and reviews of the NAP and CAP which is broadly positive however the nature of the independent assessments is not clear. Furthermore, the monitoring of NAP to date – which is on its 5th cycle- indicates it has not been effective to date in terms of bringing waterbodies impacted by agriculture up to good status. The additional measures noted are also not clear including their function if they are outside NAP which is legal text and not a plan that can be modified in the usual sense.

		programme of measures, EPA's statutory role in assessing the NAP, EPA research projects and the CAP Strategic Plan Performance Monitoring and Evaluation Framework (PMEF).	While the addition of independent assessment is positive, the overall intent of this action and its application is unclear.
Agri 7	*New action arising following Public Consultation*	In support of the Catchment Management Work Plans, the Department of Agriculture, Food and the Marine will publish an Agricultural Sectoral Action Work Plan to reduce nitrogen losses to waters in areas where levels are increasing or are too high, and to bring nitrogen, phosphorous and sediment losses to water from agricultural sources within sustainable levels by 2027.	The key activity relates to the publication of an Agricultural Sectoral Action Work Plan. This includes engagement with the Programme of Measures working group, review of Agricultural Work Plans, agreement on templates, data for input into Catchment Management Plans, data collation and tracking through annual reporting. Depending the nature of the Agricultural Sectoral Action Work Plan, measures may require screening for SEA / EIA and or AA.
Agri 8	**Agriculture 3:** Teagasc will progress the development of a web-based Farm Sustainability Plan that will complement the existing Nutrient Management Planning online tool and support the wider Agricultural Knowledge and Information Systems (AKIS) programme.	Teagasc will develop an online Farm Sustainability Plan for farmers complementing existing Nutrient Management Planning online tool to support the wider Agricultural Knowledge and Information Systems (AKIS) programme.	Action previously assessed as **Agriculture 3** in draft RBMP SEA Environmental Report. Farm Sustainability Plans will be focused on identification of farm specific actions to reduce gaseous emissions, improve water quality and conserve biodiversity. It is acknowledged that preparing a plan for all the farms will require intensive resourcing. Developing a web-based version of this plan is broadly positive in effect in the short to long-term for BFF, LS, W and CF as it will help consolidate ground-level reporting to further inform decision making. Notwithstanding that, it is clear the NMP tool is not achieving desired outcomes and further education, training and certification is required to support any online tool. This must be tackled in the short term to ensure basic standards are improved and a certification programme is in place for those completing the NMP.
Agri 9	**Agriculture 4:** Consideration will be given to extending and	Extend and expand the local authorities' water protection	The key activity for this action relates to resourcing. As noted

	expanding LAWPRO and ASSAP to support the implementation of the new CAP Strategic Plan. There will be an increased focus on sustainability across the entire farm advisory service (both Teagasc and private advisory services). This may include a role in the preparation of Farm Sustainability Plans.	office: LAWPRO will be extended for the full duration of Cycle 3 up to 2027. The CCMA will identify the appropriate level of resources and involvement of LAWPRO to meet WFD objectives up to 2027 and beyond in future RBMPs.	elsewhere, resourcing is a key element to achieving successful outcomes for water. This commitment to resourcing will have broadly positive effects in the short to medium term for PHH, W, BFF, LS and MA however, there is uncertainty into the longer term unless the commitment can be continued beyond 2027.
Agri 10	**Agriculture 4:** As above	Provide free on-farm advice to farmers: The sustainability advisory service (ASSAP) will be extended for the full duration of Cycle 3. The dairy industry has increased the number of advisors involved in ASSAP by six for the period 2022 to 2027.	The key activity in relation to this action is the provision of free on-farm advice to farmers with consideration of the ASSAP Review Report Recommendations with indirect positive effects for PHH, BFF, W, LS and MA.
Agri 11	*New action arising following Public Consultation*	To support the goal of targeting the right measure in the right place all farm advisers involved in Environmental Schemes including the Cooperation Projects and Water EIP, will be provided with the appropriate level of catchment science training to ensure that measures are sufficiently targeted. In addition, these farm advisers will be made aware of the various other relevant funding schemes available to farmers to support the right measure in the right place.	The key activity in relation to this action is the delivery of training to upskill farm advisors with indirect positive effects for PHH, BFF, W, LS and MA.
Agri 12	*New action arising following Public Consultation*	Upskill farmers and advisors to ensure they have the knowledge and tools to implement appropriate measures to reduce the impact on water quality from farming practices.	The key activity in relation to this action is the delivery of training to upskill farmers and advisors with indirect positive effects for PHH, BFF, W, LS and MA.
Deleted **(now Hymo 2)**	**Agriculture 5:** The development of a new authorisation system for instream engineering works (see new Controlled Activities for the Protection of Waters regime in Section on Hydromorphology) will strengthen controls of land drainage practices and their enforcement.	~~**Agriculture 5:** The development of a new authorisation system for instream engineering works (see new Controlled Activities for the Protection of Waters regime in Section on Hydromorphology) will strengthen controls of land drainage practices and their enforcement.~~ Moved to hydromorphology section.	N/A

5.3.5.2.2 Physical modifications to the flow, form and/or function of natural surface water bodies (Hydromorphology)

RBMP Action No.	Draft RBMP Action No. and Wording	Final RBMP Action Wording [Blue text denotes new measure]	Assessment of Effects and Requirement for Mitigation
Hymo 1	*New action arising following Public Consultation*	A Hydromorphology Expert Group will be established to support the new National Hydromorphology Programme. This Expert Group will identify interim measures which will be readily implemented during the third RBMP cycle to assist in removing hydromorphological pressures.	The key action is the establishment of a Hydromorphology Expert Group to support the new National Hydromorphology Programme. The Expert Group will consist of members from the EPA, OPW, DECC, DAFM, Waterways Ireland, CCMA, LAWPRO, Teagasc, Uisce Éireann, ESB, NPWS and DHLGH (water and planning units) who will liaise with IFI in relation to their new National Barriers Mitigation Programme and will oversee pilot projects/any actions arising from this plan. The group is chaired by DHLGH. The Expert Group will make recommendations in relation to interim measures that can be implemented during the third cycle RBMP. The action therefore has the potential to contribute towards the removal of hydromorphogical pressures and mitigation of existing barriers nationwide. This is particularly positive for BFF and WQ over short to long term as it would result in restore migratory patterns of fish species in restore free-flowing rivers in Ireland. Depending on the nature of any proposals arising from the Hydromorphology Expert Group and the associated National Hydromorphology Programme, they may require screening for SEA / EIA and AA.
Hymo 2	**Hydromorph 1:** DHLGH to develop a new Controlled Activities for the Protection of Waters regime to address pressures on the physical condition of waters.	DHLGH will lead the development of a new enhanced and consolidated legislative regime to address pressures on the physical condition of waters.	Action previously assessed as **Hydromorph 1** in draft RBMP SEA Environmental Report. **No significant negative effects** identified on any of the environmental factors as a result of this amendment.
Hymo 3	**Hydromorph 2:** DHLGH to establish a restoration programme to mitigate the negative impact of past construction in or near water	IFI will establish a restoration programme to mitigate the negative impact of past construction in or near water bodies.	Action previously assessed as **Hydromorph 2** in draft RBMP SEA Environmental Report. **No significant negative effects** identified on any of the environmental factors as a result of this amendment.

	bodies.		
Hymo 4	*New action arising following Public Consultation*	A Sectoral Action for Hydromorphology will be developed, which will include measures and plans to address the 448 water bodies at risk from hydromorphology, including barriers, channelization, drainage, sediment and flood protection. It will be led and coordinated by DHLGH with supporting bodies IFI, DAFM, Forestry, OPW and DECC.	The key activity relates to the publication of a Sectoral Action Work Plan for Hydromorphology. This includes engagement with the Programme of Measures working group, review of Hydromorphology Work Plans, agreement on templates, data for input into Catchment Management Plans, data collation and tracking through annual reporting. This is considered broadly positive for all environmental receptors however the action plans will need to consider wider impact pathways. Measures may require screening for EIA/AA.
Hymo 5	*New action arising following Public Consultation*	It is proposed that IFI will lead a multi-agency whole of catchment pilot project on the River Dodder from source to sea with the aim of examining the feasibility of opening up this heavily urbanised catchment to migratory fish species by mitigating the five most significant barriers in the lower reaches and progressing to the next stage, as appropriate.	The key activity in relation to this action is an examination of the feasibility of multiple barrier mitigation on the River Dodder. This will include stakeholder engagement and feasibility studies to determine which options may be viable. Depending on the nature and scale of any proposals arising from this feasibility work, they may require screening for SEA / EIA and AA. Early engagement on potential significant impacts on the wider environment is needed from early feasibility to ensure sustainable options are brought forward.
Hymo 6	**Hydromorph 3:** A pilot project will be undertaken for the Annacotty weir in County Limerick to assist with the design and implementation of the national restoration programme.	IFI will lead a pilot project to be undertaken for the Annacotty Weir in County Limerick. The project will provide an opportunity to test a collaborative and ecology focussed design approach. It will also test enhanced community engagement opportunities that go beyond the standard consultation practices involved in the planning process, thereby assisting with the design and implementation of the national restoration programme. The pilot project is initially examining the feasibility of mitigation and will progress to the next stages, as appropriate.	The Annacotty Fish Passage Project is a complex project with multiple stages, some of which run in parallel. The project has been designated a pilot project to assist with the design and implementation of the national restoration programme by DHLGH. During this period of assessment, IFI will engage with stakeholders through workshops, webinars, the provision of information and other outreach initiatives to highlight the issues around the Annacotty Fish Passage Project. A range of studies will be undertaken to understand the effect of any change to the weir and its impact on river levels and flows downstream and upstream. The following reports have already been completed: – Archaeology; – Architectural Heritage; – Freshwater Pearl Mussel Survey; – Hydraulic Report; – Hydrology Report; – Topographical Bathymetric Survey; and – Underwater Archaeology.

			The following reports are outstanding and will be completed when the final design option has been decided: AA Screening, NIS and EcIA. All options for fish passage improvement at the weir will be fully assessed, including: complete removal, partial removal, bypass channel construction, rock-ramp fish pass construction and the 'do-nothing/status quo' scenario. These initial studies will also identify any ecological or engineering constraints that may influence the choice of final fish passage improvement option. When all the options for fish passage improvement have been fully assessed, IFI will organise another public meeting for stakeholders to present consultants' findings and recommendations and to hear the public's views. This will be done prior to the start of any planning permission process. General project stages: - Preliminary project work. - Formation of an interagency stakeholder group. This includes representatives from IFI, Limerick City and County Council, LAWPRO, NPWS, OPW, ESB, DECC and DHLGH. - Stakeholder Engagement and Public Information Events (ongoing). - Tendering for the environmental consultants and consulting engineers - Undertaking all technical and environmental assessments. - Review of reports and decision matrix - Presentation of the preferred options to stakeholders. - Application for planning permission to Limerick City and County Council for the final agreed design. - Tendering for the construction stage of the final agreed design. - The construction stage of the project during the environmental window. - Commissioning of the new fish pass improvement works. To avoid negative effects on the environment resulting, any proposals/projects arising from this process must have regard to mitigation measures provided in associated EIAR or Environmental Report, the NIS, EcIA or any other relevant environmental assessments.
Hymo 7	**Hydromorph 4:** DHLGH to oversee the implementation of the roadmap of actions to improve fish migration in	Implementation of the roadmap of actions, including the use of state-of-the-art technical solutions, to improve fish migration in the lower Shannon at the	The key activity for this action is to implement the roadmap of actions to improve fish migration in the Lower Shannon in the vicinity of Parteen and Ardnacrusha, beginning with initial examination of the feasibility of any mitigation proposed prior to progressing any

	the lower Shannon at the Hydroelectric scheme located around Parteen and Ardnacrusha.	Hydroelectric scheme located around Parteen and Ardnacrusha. The pilot project will initially examine the feasibility of mitigation and will progress to the next stages, as appropriate.	works. It is noted that the roadmap of actions is not part of the RBMP. The supporting text in the RBMP notes that a multi-agency steering group was established in 2018 by the then Minister, to prepare recommendations for improvements to fish passage in the lower Shannon catchment. This has now resulted in the development of a draft roadmap of actions, which received Ministerial approval in 2022. The roadmap is ambitious and innovative and sets out a programme of initial investment measures which are intended to make a significant improvement to free passage for fish at Ardnacrusha and Parteen Weir in the short-term, while providing the platform for long-term enhancement of the ecology and environment of the Lower Shannon and consequently, the environmental sustainability of the Shannon Hydro-electric Scheme. The first steps proposed by this action and arising from the roadmap relate to a number of feasibility studies to assess the potential options for both up- and downstream fish passage, an environmental flow 'Eflow' regime and a management plan for the Lower River Shannon. There is a potential for both positive and negative impacts for environmental receptors. Any investment measure is considered to be broadly positive for all environmental receptors. Removal of barriers to help migrating fish and other species and restore the natural conditions of the waterbodies is particularly positive for BFF and W. However, there is a potential for negative impacts on BFF resulting from alterations to the hydrological regime of the water body and increased recreational tourism following the removal of barrier. These impacts include disturbance from human presence, destruction of holts/couches that Otters utilise or fragmentation of habitats supporting Alluvial forests. Negative impacts are also possible for MA, PHH, and LS resulting from alterations to the hydrological regime of the water body where flood risk may change impacting on current land uses, access, protection of property and soil erosion / deposition. In-combination effects – the Lower Shannon is the focus of much activity associated with recreation, industry, energy, water supply etc. As such, any changes proposed to the

			hydrologic regime need to be modelled in the context of these other pressures to ensure that cumulative effects are understood before any actions are rolled out. Depending on the nature and scale of any proposals arising from this feasibility work, must be supported by hydrological modelling and may require screening for SEA / EIA and AA as relevant.
Hymo 8	*New action arising following Public Consultation*	A proposed pilot project on the Slaney River at Clohamon will aim to improve fish passage at a medium scale hydroelectric scheme through a state and community collaborative initiative. The pilot project will initially examine the feasibility of mitigation and will progress to the next stages, as appropriate.	The key activity is the examination of the feasibility of mitigation, which will progress to the next stages if appropriate. It will include stakeholder engagement and feasibility studies. The Slaney Rivers Trust is preparing a revised design for a proposed rock ramp to improve fish passage (suitable for all species) at Clohamon Weir, following hydrometric study undertaken by the EPA to address flow ratios. Separately, a planning application (including Appropriate Assessment) was submitted to replace the tailrace barrier at Clohamon and reduce the screen size to 20 mm to prevent most adult fish species from entering the tailrace. Slaney River Trust engaged with NPWS during preparation of the planning application and were advised to undertake additional ecological survey work to support Appropriate Assessment, including mitigation measures required. All surveys have been completed. Any proposals arising from this feasibility work, will require screening for AA and depending on the nature and scale may also require screening for SEA/EIA.
Hymo 9	*New action arising following Public Consultation*	In addition to river barrier removal and mitigation other restoration and mitigation work will be developed. This will be partly guided by the framework for prioritising measures for both river restoration and Nature-based Catchment Management prepared by the EPA.	The key activity in relation to this action is the initial scoping and identification of other hydromorphological pressures on water quality, to include a report with recommendations. This will be led by DHLGH with support from a number of key stakeholders and the NPWS. Similar impacts to those identified above in relation to removal of barriers can be anticipated from other restoration and mitigation work .
3.10 repeat (as above)	**Action 3.3(1):** Undertake a technical review and public consultation on the	The Minister for Housing, Local Government and Heritage will undertake a short public consultation before deciding whether to	Action 3.10 assessed above.

	designation of Heavily Modified Water Bodies.	designate or de-designate water bodies as HMWBs. There were 466 water bodies, which the EPA has found to meet the criteria for designation. The Minister will take into account the recommendations of the EPA and the key concerns raised in the submissions to the consultation process.	
3.11 repeat (as above)	*New action arising following Public Consultation*	A review of arterial drainage requirements and the underpinning Arterial Drainage Act will be undertaken in order to inform future land use policy decisions arising out of the Land Use Review and to support the preparations for the implementation of the new Nature Restoration Law and the Heavily Modified Water Body review process.	Action 3.11 assessed above.

5.3.5.2.3 Forestry

RBMP Action No.	Draft RBMP Action No. and Wording	Final RBMP Action Wording [Blue text / strikethrough denotes significant changes]	Assessment of Effects and Requirement for Mitigation
Forestry 1	*New action arising following Public Consultation*	In support of the Catchment Management Work Plans, the Department of Agriculture, Food and the Marine will publish a Sectoral Action Work Plan. DAFM will update the 2018 document "*Forests and Water: Achieving Objectives under Ireland's River Basin Management Plan 2018-2021*" as the Forestry Sectoral Action Work Plan supporting the third RBMP.	The key activity is to publish f a Sectoral Action Work Plan and update the 2018 document "*Forests and Water: Achieving Objectives under Ireland's River Basin Management Plan 2018-2021*" as the Forestry Sectoral Action Work Plan. This includes a number of administrative steps relating to resourcing, training, review of work plans, data for input into Catchment Management Plans, data collation and tracking through annual reporting. **No significant negative effects** foreseen on any of the environmental factors as a result of this new action.
Forestry 2	*New action arising following Public Consultation*	DAFM recognises the key recommendation from the HYDROFOR Project (2016) to "cease	The key activity is the application of various policies underpinning the forestry programme (e.g. new soil type and site fertility requirements, the

		afforestation on peat soils in acid-sensitive headwater catchments" and is applying various water and non-water related policies, procedures and protocols that combine to rule out afforestation on such sites, or to limit it to appropriate multi-benefit native woodland.	exclusion of afforestation from undesignated Annex I habitats, SPAs and wetland habitats) and existing procedures and protocols (e.g. AA for all forestry applications and areas Acid Sensitivity Protocol). This is considered broadly and indirectly positive for all environmental receptors, particularly for BFF, W and CF as continued cessation of afforestation on peat soils in acid-sensitive headwater catchments will aid the reduction of dissolved organic carbon loss and improve water quality. **No significant negative effects** foreseen on any of the environmental factors as a result of this new action.
Forestry 3	**Forestry 2:** Increase the area of forests with appropriate water setbacks through the ongoing restructuring of existing forest stands at clear fell/reforestation stage to incorporate appropriate water setbacks.	DAFM to increase the area of forests with appropriate water setbacks through the ongoing restructuring of existing forest stands at clearfell / reforestation stage.	Action previously assessed as **Forestry 2** in draft RBMP SEA Environmental Report.
Forestry 4	**Forestry 3:** Ensure the application of water setbacks and other water-based protection during the creation of new forests, principally under the Afforestation Grant & Premium Scheme.	DAFM to ensure the application of water setbacks and other water-based protection during in all new forests, principally realised with support under the 2023 – 2027 Afforestation Scheme.	Action previously assessed as **Forestry 3** in draft RBMP SEA Environmental Report.
Forestry 5	**Forestry 4:** Manage the application of support measures that have a clear application in relation to the protection of water, including: the Continuous Cover Forestry Scheme; the native woodland and agri-forestry options under the Afforestation Scheme, and the Native Woodland Conservation Scheme.	DAFM to manage the application of support measures that have a clear role in relation to the protection of water, including: the Continuous Cover Forestry Scheme; the various native woodland and agri-forestry options under the Afforestation Scheme, the Native Woodland Conservation Scheme, and the Reforestation for Climate Resilience Scheme.	Action previously assessed as **Forestry 4** in draft RBMP SEA Environmental Report.
Forestry 6	**Forestry 5:** Encourage uptake of the recently-revised Woodland Creation on Public Lands Scheme to deliver	DAFM to encourage the uptake of the Forest Type 3 under the Afforestation Scheme, aimed at funding	Action previously assessed as **Forestry 5** in draft RBMP SEA Environmental Report.

	woodland-based solutions for the protection of drinking water sources and water in general.	native woodland creation on public land, specifically to deliver woodland-based solutions for the protection of drinking water sources and water in general.	
Forestry 7	*New action arising following Public Consultation*	DAFM to launch the new Forests for Water option (Forest Type 2) under the Afforestation Scheme, which offers added incentives to farmers and other landowners to promote the creation of new native forests specifically to provide water services, including improvements to water quality, drinking water source protection, natural water retention, the improvement of aquatic and riparian habitats, and the expansion of alluvial woodland.	The aim of Forest Type 2 – Forests for Water is to create new native forests in strategic locations where this land use change would deliver specific ecosystem services, including the protection of water and aquatic ecosystems. It also aims to reinforce and expand areas of alluvial forests. Applications must meet one of the following targeted objectives in order to be considered eligible: - Plant in areas identified as Rank 1-3 on the EPA Pollution Impact Potential (PIP) Maps for phosphorus to break the pathway and protect the delivery point to the receiving aquatic zone. - Plant in areas identified by LAWPRO or ASSAP, for Native Forest creation as a mitigation. - Plant in areas identified by Uisce Éireann or the National Federation of Group Water Schemes for drinking water source protection. - Plant in areas suitable for Natural Water Retention Measures. Such areas are in the process of being identified by the Office of Public Works (OPW). - Plant in areas identified by Inland Fisheries Ireland for improvement of fisheries habitat and stream ecology. - Plant to facilitate the expansion of the Habitats Directive Annex I Habitat: Alluvial Woodland 91EO. All of the targeted objectives will result in indirect, positive environmental effects in the short to long term, notably for W and BFF as these will contribute towards improvement in water quality by obstructing the pathways for nutrient pollution and expansion of protected Alluvial Woodland habitat. Notwithstanding this, planting of trees can give rise to potential negative impacts for biodiversity including: release of nutrients/suspended solids to freshwater, estuarine and coastal habitats with direct negative impacts on biodiversity including highly sensitive species such as the Freshwater Pearl

			Mussel (FPM) and sensitive habitats such as fish spawning and nursery areas. As Forestry Type 2 sits under the Afforestation Scheme, there are a number of additional requirements including application of the *Forestry Standards Manual, Environmental Requirements for Afforestation and the Land Types for Afforestation*[5]. This manual includes the requirement for EIA and AA screening as part of the application for pre-planting approval. DAFM provided a template document for applicants and registered foresters within to submit an AA screening report to DAFM in respect of a forestry licence and/or scheme approval as part of Circular 13 of 2020[6]. Documentation including any mitigation measures arising from the AA process must be submitted prior to grant receipt. All applications for afforestation approval under the Afforestation Scheme 2023-2027 will undergo an environmental assessment procedure. All applications submitted to DAFM will be subject to AA. In the context of wider environment, the applications must have regard to the mitigation measures proposed in associated EIA.
Forestry 8	**Forestry 7:** Continue to address all forestry-related water incidents, as identified by DAFM Inspectors or reported to DAFM by foresters, water agencies, NGOs and members of the public. **Forestry 8:** Further engagement between DAFM and other parties on forestry-related issues, both within the existing WFD structures and forums, and bilaterally (e.g. with Inland Fisheries Ireland).	DAFM to continue to address all forestry related water incidents, as identified by DAFM Inspectors and LAWPRO or reported to DAFM Forestry by foresters, water agencies, environmental NGOs and members of the public. ~~**Forestry 8:** Further engagement between DAFM and other parties on forestry-related issues, both within the existing WFD structures and forums, and bilaterally (e.g. with Inland Fisheries~~	Action previously assessed as **Forestry 7** in draft RBMP SEA Environmental Report. Duplication in actions removed.

[5] Forestry Standards Manual, Working Document v.08Nov23, Department of Agriculture, Food and the Marine.

[6] Government Circular 13 of 2020.

		~~Ireland).~~	
Forestry 9	**Forestry 9:** Deliver further training of Registered Foresters and Consultant Ecologists and of Department Forestry Inspectors and Ecologists, in relation to the design, assessment and implementation of forestry projects from the perspective of the protection environment, including water.	DAFM to train Registered Foresters, Consultant Ecologists and machine operators in relation to the design, and implementation of forestry projects, from the perspective of protecting and enhancing receiving waterways.	Action previously assessed as **Forestry 9** in draft RBMP SEA Environmental Report.
Forestry 10	**Forestry 1:** Continue to seek improvements to the licence applications process for key forestry activities.	Continue to seek improvements to the licence applications process for key forestry activities.	Action previously assessed as **Forestry 1** in draft RBMP SEA Environmental Report.
Deleted	**Forestry 6:** Roll-out the Woodland for Water Scheme which is focused on strategically realising native woodland in areas where such features would have a marked impact in relation the protection of water.	**Forestry 7:** DAFM to launch the new Forests for Water option (Forest Type 2) under the Afforestation Scheme, which offers added incentives to farmers and other landowners to promote the creation of new native forests specifically to provide water services, including improvements to water quality, drinking water source protection, natural water retention, the improvement of aquatic and riparian habitats, and the expansion of alluvial woodland. ~~**Forestry 6:** Roll-out the Woodland for Water Scheme which is focused on strategically realising native woodland in areas where such features would have a marked impact in relation the protection of water.~~	Action previously assessed as **Forestry 6** in draft RBMP SEA Environmental Report. Amalgamated with Forestry 7.

5.3.5.2.4 Urban Wastewater

RBMP Action	Draft RBMP Action No. and Wording	Final RBMP Action Wording	Assessment of Effects and Requirement for Mitigation

No.		[Blue text / strikethrough denotes significant changes]	
UWW 1	**UWW 1:** Continue investment in wastewater infrastructure with Irish Water investing in 83 wastewater treatment plants and 10 collection networks at an estimated cost of €1.022bn, over the period 2020-2024.	Uisce Éireann will continue investment in wastewater infrastructure investing over €2.3bn over the period 2020-2024. This includes 108 wastewater treatment plants and 77 collection networks at an estimated cost of €1.542bn and 92 national programmes at an estimated cost of €780m.	Action previously assessed as **UWW 1** in draft RBMP SEA Environmental Report. Any proposal arising from this increased investment by Uisce Éireann must be screened for SEA/EIA and AA as appropriate.
UWW 2	*New action arising following Public Consultation*	Uisce Éireann will deliver infrastructure projects as set out in the Appendices for the next RBMP 3rd cycle (2022-2027).	The release of raw or poorly treated sewage can have negative effects on water quality including enrichment. This can cause excessive growth in aquatic flora which changes the water ecosystem characteristics by reducing light availability, increasing amounts of organic matter and causing an unstable amount of dissolved oxygen. This brings aquatic ecosystem functioning imbalances and leads to eutrophication. The eutrophication mechanism leads to a chain reaction, notably a change in the structure of biological communities and trophic networks, as well as changes in biogeochemical cycles. Such conditions endanger many aquatic fauna, leading in the long-term changes in habitats. Continued investment in waste water infrastructure is therefore considered indirectly positive for PHH, BFF and W, as it reduces the incidence of raw or poorly treated waste water entering lakes, rivers, estuarine or marine waters. As with provision of any infrastructure, there is potential for direct and indirect negative effects on the receiving environment in the short to medium term for BFF, LS, W, CH, LandS and AQ/CF as a result of land use change in greenfield sites, destruction of habitat, disturbance or habitats or species and changes in environmental parameters as a result of temporary and localised emissions to water, soil or air during the construction phase. Therefore, it is important that any projects and infrastructural developments must be subjected to the outcomes of the planning and environmental assessment processes as applicable to avoid any negative environmental effects.

			.
UWW 3	*New action arising following Public Consultation*	Uisce Éireann will assess urban wastewater requirements for the 197 water bodies where urban wastewater has been identified as a significant pressure by 2027, including any new significant pressure water bodies identified by LAWPRO.	The EPA has identified 197 water bodies where urban wastewater has been identified as a significant pressure. The key activity related to this measure is the assessment of what is required for these water bodies to help remove urban wastewater as a significant pressure by 2027. This is considered indirectly positive for W and BFF in the short to long term as the assessment will identify specific issues related to urban wastewater treatment affecting the specified waterbodies. This will strengthen the existing evidence base and will help inform the measures required to tackle the associated pressures. It is noted that this action will likely be supported by the upgrading or provision of infrastructure by Uisce Éireann. As with provision of any infrastructure, there is potential for direct and indirect negative effects on the receiving environment in the short to medium term for BFF, LS, W, CH, LandS and AQ/CF as a result of land use change in greenfield sites, destruction of habitat, disturbance or habitats or species and changes in environmental parameters as a result of temporary and localised emissions to water, soil or air during the construction phase. Therefore, it is important that any projects and infrastructural developments must be subjected to the outcomes of the planning and environmental assessment processes as applicable to avoid any negative environmental effects.
UWW 4	**UWW 3:** EPA to carry out a review of Wastewater Discharge Licences	Uisce Éireann will apply for reviews of Waste Water Discharge Authorisations, where required. The applications shall be in a timeframe that is appropriate to the delivery programme and agreed with the EPA.	The key activity is the review of Waste Water Discharge Authorisations. Review of licences will be initiated by the Agency where Uisce Éireann propose to increase wastewater capacity in support of social and economic growth. The review of licences in response to changing circumstance is a positive protective measure and is likely to have indirect positive impacts on all environmental receptors.

UWW 5	**UWW 4:** Deliver a multi-annual investment programme to provide wastewater infrastructure for unsewered villages	DHLGH will deliver a multi-annual investment programme to provide wastewater infrastructure for villages not served by public wastewater collection systems.	Action previously assessed as **UWW 4** in draft RBMP SEA Environmental Report.
UWW 6	**UWW 5:** Irish Water River Basin Management Plan – Enhanced Ambition Programme to advance priority wastewater treatment plant projects whose discharges have been identified as being significant pressures on water bodies and impacting on WFD objectives.	Uisce Éireann's River Basin Management Plan – Enhanced Ambition Programme will deliver at least 10 new wastewater treatment plant upgrades not funded under the current investment plan where discharges have been identified as being significant pressures on water bodies and impacting on WFD objectives.	Action previously assessed as **UWW 5** in draft RBMP SEA Environmental Report. Any proposal arising from this programme by Uisce Éireann must be screened for SEA/EIA and AA.
UWW 7	*New action arising following Public Consultation*	Uisce Éireann will continue investment in storm water overflows with a minimum of 139 upgrades over the period 2022-2027.	The key activity in relation to this measure is continued investment in storm water overflows during the RBMP cycle. This is considered to be indirectly positive for BFF, W, PHH and MA in particular. Notwithstanding the positive impacts through improved water quality and stormwater network as a whole, ay infrastructural development/upgrades arising from the investment is expected to have temporary and localised negative impacts on BFF, LS, W, CH, LandS and AQ/CF during the construction phase. Therefore, it is important that any projects and infrastructural developments must be subjected to the outcomes of the planning and environmental assessment processes as applicable to avoid any negative environmental effects.
UWW 8	**UWW 6:** Complete negotiations and transposition into Irish law of the recast Urban Waste Water Treatment Directive	Following the completion of negotiations, DHLGH will undertake transposition into Irish law of the recast Urban Waste Water Treatment Directive.	Action updated to account for transposition into Irish law of the recast directive. Action previously assessed as **UWW 6** in draft RBMP SEA Environmental Report.
UWW 9	**UWW 7** Ensure development of any new standards for Combined Storm Overflows emerging	Following the expected recast Urban Waste Water Treatment Directive the DHLGH will update the	The key activity in relation to this measure will be development of new standards for Combined Storm Overflows.

	from an update to the Urban Waste Water Treatment Directive.	criteria for the performance of Combined Storm Water Overflows.	**No significant negative effects** foreseen on any of the environmental factors as a result of this amendment.
UWW 10	*New action arising following Public Consultation*	Uisce Éireann will put in place a Research and Innovation Programme on nature based solutions for small wastewater treatment plants.	The key activity relates to a research and innovation programme. **No significant negative effects** foreseen on any of the environmental factors as a result of this new measure.
UWW 11	*New action arising following Public Consultation*	As part of the distance to target analysis process led by the EPA, the impact of Sectoral Action Work Plans, including that for urban wastewater discharges, will be assessed as part of the preparation of the 46 Catchment Management Work Plans. Uisce Éireann will publish a Sectoral Action Work Plan. The Sectoral Action Work Plan for urban wastewater discharges will include further detailed information on the targeting of measures to address the 197 water bodies at risk from urban wastewater discharges during the third cycle.	The key activity relates to the publication of a Sectoral Action Work Plan. This includes a number of administrative steps relating to engagement with the Programme of Measures Working Group, agreement on templates, data for input into Catchment Management Plans, data collation and tracking through annual reporting. **No significant negative effects** foreseen on any of the environmental factors as a result of this new measure.
UWW 12	*New action arising following Public Consultation*	Uisce Éireann to engage with LAWPRO with the data required for their work in compiling the 46 catchment plans and also trialling the Catchment Management Plans template in the 5 pilot catchments.	The key activity relates to engagement with implementing bodies in the development of the CMPs to provide information as required for catchment plans and pilot catchment areas. **No significant negative effects** foreseen on any of the environmental factors as a result of this new measure.
UWW 13	**UWW 8:** Continue to develop and update the Gap Analysis as a tool to deliver environmental benefits for infrastructural planning.	Continue to develop and update the Gap Analysis as a tool to reflect UÉ's understanding of future needs, and consequent investment requirements.	Action previously assessed as **UWW 8** in draft RBMP SEA Environmental Report.
UWW 14	**UWW 9:** Update the Nutrient Sensitive Areas designations under the Urban Waste Water Treatment Directive.	Transpose the updated Nutrient Sensitive Areas designations under the Urban Wastewater Treatment Directive.	Action previously assessed as **UWW 9** in draft RBMP SEA Environmental Report. The key action update in the final plan relates to transposition of same.

Deleted	**UWW 2:** DHLGH to ensure ongoing engagement with Irish Water on the requirements for the next investment period (2025-2029).	~~**UWW 2:** DHLGH to ensure ongoing engagement with Irish Water on the requirements for the next investment period (2025-2029).~~ This measure has been captured by detail in other UWW measures.	N/A

5.3.5.2.5 Urban Runoff Pressures

RBMP Action No.	Draft RBMP Action No. and Wording	Final RBMP Action Wording [Blue text / strikethrough denotes significant changes]	Assessment of Effects and Requirement for Mitigation
Urban Runoff 1	**Urban Runoff 1:** Develop recommendations for an implementation strategy for nature based Sustainable Urban Drainage Systems on a national scale	LAWPRO in conjunction with DHLGH to develop recommendations for an implementation strategy for nature based Sustainable Urban Drainage Systems on a national scale.	Action previously assessed as **Urban Runoff 1** in draft RBMP SEA Environmental Report.
Urban Runoff 2	**Urban Runoff 2:** Provide interim guidance documentation to the Local and Planning Authorities on measures to be implemented to support the delivery of a greater focus on nature based solutions in advance of a national implementation strategy.	DHLGH to provide interim guidance documentation to the Local and Planning Authorities on measures to be implemented to support the delivery of a greater focus on nature based solutions in advance of a national implementation strategy. [Note: The interim guidance was delivered in Q4 2021].	Action previously assessed as **Urban Runoff 2** in draft RBMP SEA Environmental Report.
Urban Runoff 3	*New action arising following Public Consultation*	Develop a National Implementation Strategy for Nature based Sustainable Urban Drainage Systems on a national scale.	The key action relates to the development of an implementation strategy following engagement with stakeholders and the rollout of that strategy. To avoid negative effects on the environment resulting from this strategy, it should be screened for SEA and AA when drafted. **No significant negative effects** foreseen on any of the environmental factors as a result of this new measure.
Urban	**Urban Runoff 5:** Establish	DHLGH to establish a pilot	The Nature-based Solutions (NBS) pilot

Runoff 4	a programme for the modelling and monitoring of rainwater run-off and overflows.	project to investigate solutions to urban runoff using Nature-based Solutions.	projects are providing Irish based research on urban runoff. The projects include initial monitoring of potential sites, design of appropriate NBS features and monitoring after the feature is in place. The monitoring will include quality and quantity information for future analysis. In some circumstances demonstrator projects will be undertaken to provide locations for the monitoring. The projects are aiming to show how NBS can be retrofitted into long established urban areas to improve water quality, biodiversity and place-making. The location of the pilot projects will be within urban areas with existing urban runoff pressures. The output of this action will be a final report on the performance of NBS to mitigate urban runoff, which can then be used to inform policy and decision-making. This is considered to be indirectly positive for all the environmental receptors in the short to medium term. **No significant negative effects** foreseen on any of the environmental factors as a result of this amendment.
Urban Runoff 5	*New action arising following Public Consultation*	Additional resources will be provided to LAWPRO to provide specialist support to local authorities in adopting international best practice on nature-based surface water management within planning and infrastructure project delivery.	This action relates to the provision of additional specialist resources, which is broadly positive for all environmental receptors in the short term ,as it will facilitate the adoption of best practice in nature-based surface water management within planning and infrastructure project delivery. **No significant negative effects** foreseen on any of the environmental factors as a result of this amendment.
Urban Runoff 6	*New action arising following Public Consultation*	The DHLGH will work with NIEA to seek Peace Plus funding projects, which will trial Nature-based Solution measures and sustainable technologies.	The key action relates to seeking projects to trial Nature-based Solutions. The DHLGH and NIEA, with the support of the NIEA will coordinate the technical aspects of a proposal for inclusion in the next call of Peace Plus. **No significant negative effects** foreseen on any of the environmental factors as a result of this new measure. .
Urban Runoff	*New action arising following Public*	Review of outcomes of the Dublin Urban Rivers Life	The Dublin Urban Rivers Lie Project aims to improve water quality and

7	*Consultation*	project	aquatic biodiversity in urban areas by finding domestic misconnections and by building wetlands in public parks to treat and improve water quality. The mitigation of untreated urban wastewater and domestic misconnections discharges to aquatic environments is fundamental in achieving WFD objectives. The key activity is the review of the outcomes of this research project with a view to informing future policy. This is therefore considered indirectly positive for PHH, BFF, W and MA in particular over short to medium term. **No significant negative effects** foreseen on any of the environmental factors as a result of this new measure.
Urban Runoff 8	**Urban Runoff 6:** Oversee the preparation of integrated urban drainage management plans	Oversee the preparation of integrated urban drainage management plans.	Action previously assessed as **Urban Runoff 6** in draft RBMP SEA Environmental Report.
Moved to Chapter 3	**Urban Runoff 3**The National Bathing Water Expert Group to undertake a project to determine the most suitable approach to protecting bathers' health outside of the current bathing season in Dublin Bay	~~The National Bathing Water Expert Group to undertake a research project to determine the most suitable approach to protecting bathers' health outside of the current bathing season in Dublin Bay.~~ Action moved to Chapter 3	N/A
Moved to Chapter 3	**Urban Runoff 4:** DHLGH to amend the existing Bathing Water Regulations (S.I. No. 79 of 2008) to provide discretion to local authorities on determining the bathing season for individual bathing waters.	~~DHLGH to amend the existing Bathing Water Regulations (S.I. No. 79 of 2008) to provide discretion to local authorities on determining the bathing season for individual bathing waters.~~ Action moved to Chapter 3	N/A

5.3.5.2.6 Domestic Wastewater Discharges (Septic Tanks)

RBMP Action No.	Draft RBMP Action No. and Wording	Final RBMP Action Wording [Blue text / strikethrough denotes significant changes]	Assessment of Effects and Requirement for Mitigation

Domestic WW1	**Domestic Ww 1**: In line with the programme for government commitment to 'continue to help fund upgrades to domestic wastewater treatment systems, DHLGH will continue to monitor the uptake of the new grant schemes to ensure adequate numbers of people are availing of this measure. A research project will be initiated under the ESRI Research Programme on behaviours and attitudes to assess the level of uptake, impediments to uptake and to make recommendations for improving uptake.	DHLGH will continue to promote and monitor the uptake of the new grant schemes to ensure adequate numbers of people are availing of this measure. A research project will be initiated under the ESRI Research Programme on behaviours and attitudes to assess the level of uptake, impediments to uptake and to make recommendations for improving uptake.	Action previously assessed as **Domestic WW 1** in draft RBMP SEA Environmental Report.
Domestic WW2	**Domestic Ww 2:** A review of the National Inspection Plan (NIP) 2018-2021 to be completed, with the outcome informing the next NIP for the period 2022-2027. An objective of these plans is to prioritise inspections to areas of greatest environmental and public health risk and secure upgrading works where required.	A review of the National Inspection Plan (NIP) 2018-2021 was completed, with the outcome informing the next NIP for the period 2022-2027. An objective of these plans is to prioritise inspections to areas of greatest environmental and public health risk and secure upgrading works where required.	Action previously assessed as **Domestic WW 2** in draft RBMP SEA Environmental Report.
Domestic WW3	*New action arising following Public Consultation*	Local authorities to engage with householders to improve general awareness of septic tank maintenance requirements, and to address any failing septic tanks.	Septic tanks are a major cause of diffuse pollution to surface and ground water bodies, particularly in rural areas and are impacting on water quality in surface and groundwater particularly in areas of low soil permeability. This is largely due to lack of maintenance of systems. This pollution causes nutrient enrichment of water bodies and contamination of drinking water sources in some cases. Poorly performing or maintained domestic wastewater treatment systems are highlighted as a significant pressure on Ireland's environment (EPA November 2020). This measure relates to improving awareness of septic tank maintenance requirements with householders and addressing any failing septic tanks. Addressing these failures is considered to be indirectly positive for PHH, BFF, W and MA as it will result in

			improvements in water quality and water dependant ecosystems which are at risk from failing or deteriorating domestic wastewater treatment systems. Where upgrades or new systems are required, there is potential for direct, indirect, construction, operational and cumulative effects on wider environment and therefore it is important that any proposals for new septic tanks or upgrades must be screened for EIA and AA as appropriate.
Domestic WW4	*New action arising following Public Consultation*	Local authorities to complete 5,800 inspections between 2022 and 2026 under the National Inspection Plan.	The key activity relates to the completion of a target of 5,800 inspections between 2022 and 2026. This will include resources in local authorities that are clearly ring-fenced for this measure. Inspections will be planned and completed each year as set out in the National Inspection Plan. This will increase the level of compliance and result in positive impacts for all environmental receptors in the short to long term, as increased monitoring and reporting will help inform policy decisions particularly related to water quality in Ireland. **No significant negative effects** foreseen on any of the environmental factors as a result of this new measure.
Domestic WW5	*New action arising following Public Consultation*	The DHLGH to issue a policy direction to Local Authorities regarding Advisory Notices and Local authorities to enforce advisory notices issued under the National Inspection Plan.	The key activity relates to the issuing of advisory notice to local authorities. Local authorities will also ring-fence resources for this measure. Enforcement will be progressed in line with the Water Services Act and the National Inspection Programme and activities will be documents and an annual report sent to DHLGH and the EPA. This is considered indirectly positive for PHH, BFF, W and MA as it improves compliance and enforcement of the National Inspection Plan at the local level to ensure that negative impacts on the environment is mitigated in a timely manner. **No significant negative effects** foreseen on any of the environmental factors as a result of this new measure.
Domestic WW6	**Domestic Ww 3:** DHLGH to consider the outcomes of the research project into the application of zero	DHLGH to consider the outcomes of the research project into the application of zero discharge nature based	Action previously assessed as **Domestic Ww 3** in draft RBMP SEA Environmental Report.

	discharge nature based solutions and their applicability or not within Ireland's climatic conditions.	solutions and their applicability or not within Ireland's climatic conditions.	
Domestic WW7	**Domestic Ww 4:** Review the outcomes of the pilot projects under the first multi-annual Developer-Provided Water Services Infrastructure Resolution Programme to inform future policy considerations on resolving sub-standard developer provided infrastructure with sustainable solutions.	Review the outcomes of the pilot projects under the first multi-annual Developer-Provided Water Services Infrastructure Resolution Programme to inform future policy considerations on resolving sub-standard developer provided infrastructure with sustainable solutions.	Action previously assessed as **Domestic Ww 4** in draft RBMP SEA Environmental Report.

5.3.5.2.7 Unknown Pressures

RBMP Action No.	Draft RBMP Action No. and Wording	Final RBMP Action Wording [Blue text / strikethrough denotes significant changes]	Assessment of Effects and Requirement for Mitigation
Unknown 1	**Unknown 1:** The Local Authority Waters Programme will conduct assessments of water bodies with unknown pressures in priority areas for action to identify the significant pressures in these areas with a high level of confidence.	The Local Authority Waters Programme (LAWPRO) will conduct assessments of water bodies in Priority Areas for Action where the pressures are unknown to identify the specific issues and actions that are required to protect or restore water quality as necessary.	The key activity will be for LAWPRO to conduct assessments of water bodies with unknown pressures in priority areas for action. Identification of specific issues and measures that will help improve the water quality across Ireland is indirectly positive for PHH, BFF, LS and MA in the short to medium term. This will also contribute towards the achievement of the WFD objectives in the Priority Areas of Action. **No significant negative effects** foreseen on any of the environmental factors as a result of this amendment.
Unknown 2	**Unknown 2:** Each local authority will conduct assessments of water bodies with unknown pressures (those not within priority areas for action) to identify the significant pressures in these areas with a high level of confidence.	Each local authority supported by LAWPRO will conduct assessments of other water bodies where the pressures are unknown (which are not within priority areas for action) to identify the specific issues and actions that are required to protect or restore water quality as necessary.	The key activity will be to conduct assessments of water bodies with unknown pressures (those not within priority areas for action). Similar to measure Unknown 1, identification of specific issues and measures that will help improve the water quality across Ireland is indirectly positive for PHH, BFF, LS and MA in the short to medium term. This will also contribute towards the achievement of the WFD objectives for waterbodies outside the Priority

			Areas of Action. **No significant negative effects** foreseen on any of the environmental factors as a result of this amendment.
Unknown 3	**Unknown 3:** The Local Authority Environmental Services National Training Group (LAESNTG) will provide a training programme for catchment assessment and Integrated Catchment Management for the staff of local authorities and all implementing bodies.	The Local Authority Services National Training Group (LASNTG) will provide appropriate training programmes including on Catchment assessment, Integrated Catchment Management, and farm inspections for the staff of local authorities and all implementing bodies.	Action previously assessed as **Unknown 3** in draft RBMP SEA Environmental Report.

5.3.5.2.8 Other Pressures

RBMP Action No.	Draft RBMP Action No. and Wording	Final RBMP Action Wording [Blue text / strikethrough denotes significant changes]	Assessment of Effects and Requirement for Mitigation
Other 1	*New action arising following Public Consultation*	DHLGH will prepare a proposal for enacting abstraction regulations.	The key activity here is the preparation of a proposal for enacting abstraction regulations in Q3 2024 that was passed in December 2022. It introduces controls and prior authorisation for abstractions and associated impoundments. This is considered directly positive for W and BFF in the short to long term as it will contribute towards the achievement of the WFD objectives. **No significant negative effects** foreseen on any of the environmental factors as a result of this new measure.
Other 2	**Action 2.4(7):** Irish Water and relevant stakeholders will work together to implement mitigation measures for abstractions determined to be significant pressures through the abstraction licensing process.	The EPA, as competent authority will work with stakeholders to identify mitigation measures for abstractions determined to be significant pressures, and through the abstraction licensing process, require the implementation of relevant mitigation measures.	Action previously assessed as **Action 2.4(7)** in draft RBMP SEA Environmental Report.
Other 3	**Action 2.4(8):** The need for exemptions will be reviewed as the abstraction licensing process is rolled	The need for exemptions will be reviewed as the abstraction licensing process	Action previously assessed as **Action 2.4(8)** in draft RBMP SEA Environmental Report.

	out.	is rolled out.	
Other 4	~~**Other 1:** Relevant national authorities to ensure full implementation of the existing measures.~~	~~Relevant national authorities to ensure full implementation of the existing measures.~~ Deleted	Other actions provide the intended clarity on implementing measures, particularly the Sectoral Action Plans and PDO.

5.3.5.2.9 Peatlands

RBMP Action No.	Draft RBMP Action No. and Wording	Final RBMP Action Wording [Blue text / strikethrough denotes significant changes]	Assessment of Effects and Requirement for Mitigation
Peat 1	**Peat 1:** Measures set out in the National Peatlands Strategy be updated into a new Implementation Plan by NPWS.	Measures set out in the National Peatlands Strategy be updated into a new Implementation Plan by NPWS.	Action previously assessed as **Peat 1** in draft RBMP SEA Environmental Report.
Peat 2	*New action arising following Public Consultation*	In support of the Catchment Management Work Plans, the NPWS will publish a Sectoral Action Work Plan. Measures set out in the National Peatlands Strategy be updated into the Sectoral Action Work Plan by NPWS.	The key activity relates to the publication of a Sectoral Action Work Plan by NPWS. This includes a number of administrative steps relating to stakeholder engagement and agreement on templates, data for input into Catchment Management Plans, data collation and tracking through annual reporting. **No significant adverse effects** foreseen on European sites, their QIs/SCIs, conservation objectives or site integrity.
Peat 3	**Peat 2:** NPWS to continue driving implementation of the various programmes to restore the raised bog SAC and NHA network.	Continuation and expansion of NPWS national programme of peatland restoration on SAC and NHA raised bogs, blanket bogs and fens.	Action previously assessed as **Peat 2** in draft RBMP SEA Environmental Report.
Peat 4	**Peat 5:** Bord na Móna to oversee the “Peatlands and People” LIFE Integrated Project.	Bord na Móna to oversee the EU LIFE Integrated Project “Peatlands and People” .	Action previously assessed as **Peat 5** in draft RBMP SEA Environmental Report.
Peat 5	**Peat 6**: NPWS and Geological Survey Ireland to fund an investigation into the causes of blanket bog landslides that occurred across Ireland in 2020, and	NPWS and Geological Survey Ireland to fund an investigation into the causes of blanket bog landslides that occurred across Ireland in 2020, and the vulnerability of	Action previously assessed as **Peat 6** in draft RBMP SEA Environmental Report.

	the vulnerability of other at-risk areas to future failures.	other at-risk areas to future failures.	
Peat 6	**Peat 7**: DAFM to oversee the implementation of sustainable management practises developed through the Blackstairs Mountains, Wicklow Mountains and MacGillycuddy Reeks Mountains EIP projects.	DAFM to oversee the implementation of sustainable management practices developed through the Blackstairs Mountains and Wicklow Mountains EIP projects within the ACRES East/South East Cooperation Project zone.	Action previously assessed as **Peat 7** in draft RBMP SEA Environmental Report .
Peat 7	*New action arising following Public Consultation*	Continuation of the Bord na Móna operated Enhanced Decommissioning, Rehabilitation and Restoration Scheme (EDRRS) to H2 2026.	Continuation of this scheme is considered to be indirectly positive for BFF, LS, W, CF over short to long term as it will continue to deliver a range of climate action benefits from greenhouse gas mitigation through reduced carbon emissions, carbon storage and accelerated carbon sequestration, in addition to enhancing biodiversity and protecting water quality. The NPWS as regulator for the scheme will ensure that all proposed improvements optimise climate, environmental, ecological and hydrological benefits. The key activities relate to the decommissioning, rehabilitation and restoration of a significant proportion of Bord na Mona bogs. **No significant negative effects** foreseen on any of the environmental factors as a result of this new measure.
Peat 8	**Peat 4**: DHLGH to oversee the coordination of the Wild Atlantic Nature LIFE Integrated Project (IP), bringing together the experience and knowledge of the associated partners.	Continuation of NPWS-led EU LIFE IP Wild Atlantic Nature programme, including the development of complementary projects such as enhancing restoration capacity through building projects such as Natura Communities, retrofitting programmes to reduce turf cutting in the Natura 2000 network of sites and development of a nature restoration programme compatible with Ireland's CAP Strategic Plan.	The Wild Atlantic Nature Project is a 9-year EU-funded LIFE Integrated Project, working with farmers, local communities and landowners to add value to the wide range of services provided from Special Areas of Conservation (SAC) network of blanket bogs and associated areas. These peatlands provide clean drinking water, store carbon, support biodiversity, produce high quality food and support resilient rural economies and livelihoods through farming, tourism, recreation and other activities. As part of the overall project, a results-based payment scheme is being trialled on a voluntary basis. This approach links payments to the environmental quality of a farm, with higher nature

			quality resulting in a higher payment level. The results based approach recognises that management of farmland (including farmyard management, nutrient balance, and condition and management of watercourses) has a direct influence on the quality of habitat. This incentivisation linked to habitat quality will have positive for PHH, BFF, W and CF over short to medium term. Enhancing restoration capacity through Natura Communities and retrofitting programmes to reduce turf cutting in the Natura 2000 site network is directly positive particularly for BFF and W in the short to long term as it will result in enhancing the protection of European sites and their conservation objectives. A nature restoration programme compatible with the CAP Strategic Plan will further enhance the implementation of these objectives. **No significant negative effects** foreseen on any of the environmental factors as a result of this amendment.
Deleted	~~**Peat 3:** Appropriate bodies to implement the actions arising from the CANN and CABB Interreg programmes.~~	~~**Peat 3:** Appropriate bodies to implement the actions arising from the CANN and CABB Interreg programmes.~~ Complete	N/A
Deleted	~~**Peat 8:** NPWS to explore peatland financing options to escalate restoration efforts including public private partnerships, community trusts, offsetting etc.~~	~~**Peat 8**: NPWS to explore peatland financing options to escalate restoration efforts including public private partnerships, community trusts, offsetting etc.~~ Deleted	N/A

5.3.5.2.10 Industry, Mines and Quarries

RBMP Action No.	Draft RBMP Action No. and Wording	Final RBMP Action Wording [Blue text / strikethrough denotes significant changes]	Assessment of Effects and Requirement for Mitigation
IMQ 1	**IMQ 1:** DHLGH will examine opportunities to further support businesses in taking on a water stewardship approach in	DHLGH will examine opportunities to further support businesses in taking on a water stewardship approach in their	Action previously assessed as **IMQ 1** in draft RBMP SEA Environmental Report.

	their operations.	operations.	
5.2 repeat (as above)	**IMQ 2:** The EPA will establish a Working Group under the National Technical Implementation Group to examine the implementation of current legislation governing activities which pose a risk to waters and to identify opportunities to improve compliance with it. The focus will be on protecting water bodies from pressures and activities which are resulting in deterioration of water quality.	The National Technical Implementation Group will identify the issues preventing water quality objectives from being achieved and will identify any further evidence, legislative, policy or implementation gaps that need to be addressed.	The key activity will be the identification of issues along with any legislative, policy or implementation gaps preventing the achievement of water quality objectives. This is considered broadly and indirectly positive for all environmental receptors in the short to long term as it will help inform policy decisions related to pressures and activities impacting water quality. **No significant negative effects** foreseen on any of the environmental factors as a result of this amendment.

5.3.5.2.11 Drinking Water Source Protection

RBMP Action No.	Draft RBMP Action No. and Wording	Final RBMP Action Wording [Blue text / strikethrough denotes significant changes]	Assessment of Effects and Requirement for Mitigation
Drinking Water 1	**Drinking Water 1:** Drinking Water Expert Group to make recommendations to the Minister regarding a new approach to drinking water source protection as part of the transposition of the recast Drinking Water Directive.	Development of Drinking Water Source Protection Framework and Guidelines to meet the requirements of the recast Drinking Water Directive and incorporating the application of abstraction controls under the implementing regulations for the Water Environment (Abstractions and Associated Impoundments) Act 2022.	The key activities will be preparation of a Drinking Water Protection National Framework and guidance in line with the new Drinking Water Directive; development of a new risk based approach for management of water supply catchments and assigning responsibilities to appropriate public bodies for implementation, risk assessment, monitoring and risk management and regulations for the implementation of Water Environment (Abstractions and Associated Impoundments) Act 2022. This will include a framework for the implementation of abstraction controls on large and environmentally significant abstractions. Effective abstraction control may limit the volume of water being abstracted and enact more stringent controls on abstractions and impoundments, including the requirement for

			environmental assessment and licensing. These activities will result indirect positive effects for WQ and indirect positive effects for PHH in the short to long term as it will lead to an increase in protection of water sources, thereby reducing the need for water treatment in terms of drinking water and risk to health. Abstractions can change flow dynamics, nutrient loads and dispersion rates. This in turn can lead to in-combination effects with other emissions to the same water body or catchment. However, the purpose of these new regulations is for the sustainable management of water abstractions which is broadly and indirectly positive for W and BFF in the short to long term. **No significant negative effects** foreseen on any of the environmental factors as a result of this amendment.
Drinking Water 2	*New action arising following Public Consultation*	A Sectoral Action Plan for Drinking Water will include measures and plans to address the source protection actions proposed under the Drinking Water Regulations. It will be coordinated by the DW Expert Group with support from Uisce Eireann, NFGWS and LAs.	The key activity relates to the publication of a Sectoral Action Work Plan for Drinking Water. This includes a number of administrative steps relating to stakeholder engagement and agreement on templates, data for input into Catchment Management Plans, data collation and tracking through annual reporting. **No significant negative effects** foreseen on any of the environmental factors as a result of this new measure.

5.3.5.2.12 Invasive Alien Species

RBMP Action No.	Draft RBMP Action No. and Wording	Final RBMP Action Wording [Blue text / strikethrough denotes significant changes]	Assessment of Effects and Requirement for Mitigation
Invasive 1	**Invasive 1:** NPWS to finalise legislation for the implementation of EU	Finalise legislation for the implementation of the EU Invasive Alien Species (IAS)	Action previously assessed as **Invasive 1** in draft RBMP SEA Environmental Report.

	Regulation.	Regulation.	
Invasive 2	**Invasive 2:** NPWS to prepare draft management plans and priority pathway actions plans for priority invasive species.	Implementation of existing management plans and Priority Pathway Action Plans (PPAP) for priority invasive species and drafting of a new PPAP for Soils and Spoil.	Under Article 13(1) of the EU Regulation on Invasive Alien Species, Member States are required to carry out comprehensive analysis of the pathways of unintentional introduction and spread of invasive alien species and 'identify the pathways which require priority action because of the volume of species or of the potential damage caused by the species entering the Union through those pathways'. By analysing the risk of each of the IAS of Union concern being introduced and spread in Ireland with the potential impact they may have, the associated pathways are ranked and prioritized. For the priority pathways, Pathway Action Plans are developed. The purpose of Pathway Action Plans is to prevent or minimize the risk posed by the pathways using measures such as raising public awareness and setting out actions to prevent unintentional introductions by minimizing the contamination of goods, commodities, vehicles, and equipment by invasive alien species, and ensuring appropriate border checks. It is noted that the EU regulations do not include some of the most prevalent IAS in Ireland including Japanese knotweed, Himalayan Balsam and Giant Hogweed. Therefore, focussing on only the EU list may not adequately address the issues being experienced in Ireland at the present time. Therefore, it is important to prepare the proposed management and action plans to integrate multiple forms of IAS. This is considered indirectly positive for PHH, BFF, W, LS, MA, CH and LandS the management plans can offer a more effective, economic and sustainable way of managing invasive species in the

			short to medium term based on the existing evidence. However, management is not without risk associated with unintended spread, use of chemicals in treatment etc. which has potential to negatively impact PHH, BFF, W, LS, MA, CH and LandS.
Invasive 3	*New action arising following Public Consultation*	In support of the Catchment Management Work Plans, the NPWS will publish a Sectoral Action Work Plan, which will include for the implementation of existing management plans and Priority Pathway Action Plans (PPAP) for priority invasive species and drafting of a new PPAP for Soils and Spoil.	The key activity relates to the publication of a Sectoral Action Work Plan by NPWS. This includes a number of administrative steps relating to stakeholder engagement and agreement on templates, data for input into Catchment Management Plans, data collation and tracking through annual reporting along with implementation of PPAP focused on invasive species management. These are considered broadly positive for all environmental receptors. **No significant negative effects** foreseen on any of the environmental factors as a result of this new measure.
Invasive 4	**Invasive 3:** NPWS to advance negotiations on the recruitment of additional Biodiversity Officers.	Complete negotiations on the recruitment of additional Biodiversity Officers.	Action previously assessed as **Invasive 3** in draft RBMP SEA Environmental Report.
Invasive 5	**Invasive 4:** An additional €500,000 to be provided for projects tackling Invasive Alien Species under the Local Authority Biodiversity Grant Scheme.	Include action on Invasive Alien Species (IAS) as a priority under the Local Authority Biodiversity Grant Scheme. The Local Biodiversity Action Fund provides Local Authorities with funding to target actions in the National Biodiversity Action Plan. Projects that include the mapping and appropriate treatment of IAS are listed as priorities within this funding stream.	This action has been strengthened by creating a specific funding stream priority. The key activity will be funding of projects to tackle IAS particularly at the local level. While tackling IAS is broadly positive for PHH, BFF, W, LS, MA, CH and LandS as it will support the control and management of invasive species in the short to medium term. Notwithstanding this, the project supported by this scheme should under EIA or AA Screening as appropriate to avoid any unintended spread, use of

			chemicals in treatment etc. while managing the IAS. AA screening of projects tackling Invasive Alien Species will be required to ensure these direct, indirect or ex-situ effects are fully considered.
Invasive 6	*New action arising following Public Consultation*	Develop a National Management Plan for Invasive Species and bring to public consultation in early 2024.	The key activity relates to the development of a plan. It includes the convening of a steering group to finalise the draft plan, public consultation and stakeholder engagement and finally, publication of a National Management Plan for Invasive Species. This is considered to have positive impacts for PHH, BFF, W, LS, MA, CH and LandS in the short to medium term. **No significant negative effects** foreseen on any of the environmental factors as a result of this new measure. .
Deleted	**Invasive 5:** DHLGH to provide increased funding to the Community Water Fund to allow for additional projects, including invasive species control projects, to be undertaken at community level.	~~**Invasive 5:** DHLGH to provide increased funding to the Community Water Fund to allow for additional projects, including invasive species control projects, to be undertaken at community level.~~	N/A The action of increased funding for invasive species control has been captured by **Invasive 5** and **Action 6.14** and therefore deleted.

5.3.5.2.13 Hazardous Chemicals in the Aquatic Environment

RBMP Action No.	Draft RBMP Action No. and Wording	Final RBMP Action Wording [Blue text / strikethrough denotes significant changes]	Assessment of Effects and Requirement for Mitigation
HazChem 1	**HazChem 1:** DHLGH will amend the EQS Regulations to take account of the assessment of River Basin Specific Pollutants (RBSPs) by the National Aquatic Environmental Chemistry Group (NAECG). **HazChem 3:** Follow up scoping study on River Basin Specific Pollutants will be undertaken by the NAECG.	DHLGH will amend the EQS Regulations to take account of the assessment of River Basin Specific Pollutants (RBSPs) by the National Aquatic Environmental Chemistry Group (NAECG). ~~**HazChem 3:** Follow up scoping study on River Basin Specific Pollutants will be undertaken by the NAECG.~~	Action previously assessed as **HazChem 1** in draft RBMP SEA Environmental Report. HazChem 3 has been deleted in the final plan due to overlap with HazChem 1, which incorporates it.

HazChem 2	**HazChem 2:** DHLGH and EPA will input into the recently commenced EU work to revise the list of Priority Substances and Priority Hazardous Substances.	DHLGH and EPA will input into the recently commenced EU work to revise the list of Priority Substances and Priority Hazardous Substances.	Action previously assessed as **HazChem 2** in draft RBMP SEA Environmental Report.
HazChem 3	*New action arising following Public Consultation*	Teagasc, ASSAP and DAFM, with support from LAWPRO, will implement specific actions in high-risk catchments to protect water quality from toxic impacts arising from the handling, use and disposal of sheep dip.	The handling, use and disposal of sheep dip has the potential to result in serious water quality impacts if not done correctly. Poor siting, inadequate disposal and particularly poor management of the dipping operation can be responsible for water quality impacts[7]. Proposed measure of implementing specific actions in high-risk catchments to protect water quality from toxic impacts arising from the handling, use and disposal of sheep dip is indirectly positive for W, BFF and PHH in the short to medium term. The NTIG will work with the National Hazardous Waste Management Plan working group in relation to preventing toxic impacts arising from such activities and causing water quality deteriorations and provide draft recommendations for the management of sheep dip. It is anticipated that these actions will protect water quality from deterioration. **No significant negative effects** foreseen on any of the environmental factors as a result of this new measure.
	HazChem 4: The NAECG will oversee a project to develop revised Environmental Quality Standards for the protection of designated shellfish waters.	~~**HazChem 4:** The NAECG will oversee a project to develop revised Environmental Quality Standards for the protection of designated shellfish waters.~~	This action has been folded into Aqua 4 (final RBMP) with the responsibility for a review of legislation sitting with DHLGH. **No significant negative effects** foreseen on any of the environmental factors as a result of this new measure.

[7] Virtue, W.A. and Clayton, J.W. (1997). *Sheep dip chemicals and water pollution*. Science of the Total Environment, Volumes 194-195, pgs 207-217.

5.3.5.2.14 Aquaculture

RBMP Action No.	Draft RBMP Action No. and Wording	Final RBMP Action Wording [Blue text / strikethrough denotes significant changes]	Assessment of Effects and Requirement for Mitigation
Aqua 1	*New action arising following Public Consultation*	Review of consents causing impacts: DAFM will conduct a periodic review and, where necessary, update of controls contained in aquaculture consents.	The key activity relates to a periodic review and update of controls contained in aquaculture consents, which may result in revised licences, as appropriate. The updates may result in more stringent controls being applied in aquaculture consents following review and discussions between DAFM and DHLGH. This is considered broadly positive with indirect impacts for W, BFF, PHH and MA in the short to medium term as it will help prevent deterioration of water quality, spread of diseases and contamination of aquaculture products. **No significant negative effects** foreseen on any of the environmental factors as a result of this new measure.
Aqua 2	**Aqua 2:** DAFM and DHLGH to review opportunities to strengthen the links between the Aquaculture licensing process and the objectives of the WFD.	Enhanced integration of WFD into Aquaculture Consents: DAFM to enhance links between the aquaculture authorisation and the objectives of the Water Framework Directive.	The key activity will be examining options for strengthening links between aquaculture and WFD. This includes engagement between DAFM and DHLGH to review how the WFD process is provided for within the aquaculture licensing system. This is considered broadly positive with indirect impacts for W and BFF, in the short to medium term as it will help prevent deterioration of water quality and decline of water dependent habitats and species. **No significant negative effects** foreseen on any of the environmental factors as a result of this new measure.
Aqua 3	**Aqua 1:** DAFM to seek to improve access to information through the launch of an online mapping viewer of licensed aquaculture sites in Ireland which will link to licence information already	Online Aquaculture licensing: To encourage the active involvement of all interested parties DAFM is to launch an online mapping viewer of licensed aquaculture sites in Ireland including access to licence and licence application	Action previously assessed as **Aqua 1** in draft RBMP SEA Environmental Report.

	available online.	information.	
Aqua 4	**Aqua 3:** DHLGH will seek to implement a new legislative and management framework for shellfish waters in Ireland.	*Enhanced Protection for Designated Shellfish Production Areas*: DHLGH will examine the need for amendments to legislation and whether a new management framework for shellfish waters in Ireland is needed.	Action previously assessed as **Aqua 3** in draft RBMP SEA Environmental Report.
Aqua 5	*New action arising following Public Consultation*	Complete the National Strategic Plan for Sustainable Aquaculture, including water quality measures.	The National Strategic Plan for Sustainable Aquaculture Development 2030 was published in October 2023. Article 34 of Regulation (EU) No 1380/2013 of the European Parliament and of the Council on the Common Fisheries Policy ('the CFP'), on the promotion of sustainable aquaculture, calls for the establishment of multiannual national strategic aquaculture plans. The NSPSA 2030 is the second such plan under the current CFP. The plan identifies, inter alia, measures to secure sustainable development and growth of aquaculture through coordinated spatial planning. It was subject to both AA and SEA. **No significant negative effects** foreseen on any of the environmental factors as a result of this new measure.

5.3.5.2.15 Land Use Planning

RBMP Action No.	Draft RBMP Action No. and Wording	Final RBMP Action Wording [Blue text / strikethrough denotes significant changes]	Assessment of Effects and Requirement for Mitigation
Land Use 1	**Land Use 1:** Roll out training on the new water and planning guidance to practitioners.	Finalise guidelines for the incorporation of the Water Framework Directive considerations into the planning system and roll out of training on the new water and planning guidelines to practitioners.	The key activities are to finalise the guidelines and roll out training on the guidelines with indirect positive effects for BFF, W and LS as well as PHH and MA from the increase certainty that such guidelines will bring to land use planning. Notwithstanding this is it

			recognised that the guidelines have been in preparation for a significant period of time. Decisions on land use activities have continued without the benefit of explicit WFD consideration at forward planning or development management stages although it is accepted that this is addressed indirectly in many cases through the Water chapter of the various stator reports. It is further noted that in the interim there has been a considerable focus on climate actions, many of which will require significant land use change affecting freshwater, estuarine, marine and groundwater bodies. This increased pressure adds to the urgency on finalisation of the guidelines. A timebound addition would greatly benefit this action. In addition, it is recommended that the training specifically addresses the integration of WFD with the Habitats Directive and with commitments under CAP. Specifically, it should address the issues of overlap, potential for conflicting or more onerous objectives under the different pieces of legislation and the differences in "tests" for assessment purposes under both pieces of legislation.
Land Use 2	**Land Use 2**: Progress amendments to the planning and development legislation to give effect to the new guidance.	Legislative provision to give effect to the new Water and Planning Guidance to be progressed.	The key activity is legislative provision and as above this is likely to result in indirect positive effects for BFF, W and LS as well as PHH and MA from the increase certainty that legislation will bring. It is recommended that the legislation clarifies how the requirements of the Habitats Directive and other potentially conflicting legislation such as the Climate Act are to be considered and the process where conflicts arise.

5.3.5.2.16 Protecting and Restoring Estuarine and Coastal Waters

RBMP Action	Draft RBMP Action No. and Wording	Final RBMP Action Wording [Blue text / strikethrough	Assessment of Effects and Requirement for Mitigation

No.		denotes significant changes]	
Coastal 1	*New action arising following Public Consultation*	*Marine Protected Areas (MPAs) which are within the areas covered by the WFD (up to one nautical mile off shore) will be incorporated into the registered of protected areas under the WFD, once the legislation is enacted.*	The key activity relates to the enactment of stand-alone legislation to enable the identification, designation and management of MPAs in accordance with national ambitions and international commitments. The designation of MPAs using best available science and a participatory, ecosystem-based approach is ongoing. It also includes the development of management plans for designated MPAs, with the goal of 30% MPA coverage by 2030. MPAs can support economic activity associated with the sea; for example, by conserving areas of particular importance to marine ecosystems and ensuring that human activity is kept at a level that will sustain biological diversity, natural productivity, human health and well-being. MPAs can also help reduce the effects of climate change and ocean acidification by ensuring that marine ecosystems are healthy and resilient, and that the marine environment can act as a natural carbon storage system. This science-based approach to the designation and management of MPAs, in addition to the enactment of legislation will have direct and indirect positive effects for all environmental receptors by ensuring co-existence of marine based activities is understood in the wider context of an ecosystem-based approach and ecosystem restoration. **No significant negative effects** foreseen on any environmental factor as a result of this new measures.

5.3.6 Implementation and Governance

RBMP Action No.	Draft RBMP Action No. and Wording	Final RBMP Action Wording [Blue text / strikethrough denotes significant changes]	Assessment of Effects and Requirement for Mitigation
6.1	**Action 2.4(1):** LAWPRO, in consultation with	LAWPRO will oversee the development of the template	Action previously assessed as **Action 2.4(1)** in draft RBMP SEA

	stakeholders, to produces templates for the catchment management plans that will be put in place for each of the 46 hydrometric catchments.	for the 46 Catchment Management Work Plans by Q2 2024.	Environmental Report.
6.2	*New action arising following Public Consultation*	Implementing Bodies to engage with LAWPRO to provide the data required for their work in compiling the 46 Catchment Work Plans and also trialling the CMP template in the 5 pilot catchments.	The key activity relates to engagement between LAWPRO and implementing bodies to provide information as required for the development of the 46 catchment plans and utilising the CMP template in the pilot catchment areas. This is considered directly positive for W in the medium to long term. However, there is potential for negative effects on BFF if templates do not specifically address integration of conservation objectives and achievement of favourable conservation status in relation to water dependant habitats and species. It is not clear what level of detail is proposed in the CMPs however, these offer potential for more detailed environmental assessment of specific actions and specific locations. This will be required to properly assess environmental implications and any mitigation strategies required.
6.3	*New action arising following Public Consultation*	DHLGH will establish a Programme Delivery Office to oversee and co-ordinate the many relevant bodies that manage, implement, and enforce legislation and policies relevant to the Water Framework Directive.	The key activity relates to the establishment of a Programme Delivery office to provide coordination and management of stakeholders that manage, implement and enforce legislation and policies relevant to the WFD. It is anticipated that this will lead to increased collaboration and efficiency in the implementation of WFD objectives. **No significant negative effects** foreseen on any of the environmental factors as a result of this new measure.
6.4	**Structural / Societal 1:** DHLGH to provide clarification on the roles and responsibilities of the various implementation bodies, shifting emphasis from the sharing of information and the provision of updates to a more focused provision of	DHLGH will review the roles and responsibilities of implementation bodies, shifting emphasis from the sharing of information and the provision of updates to a more focused provision of high-level policy direction, monitoring implementation of the Plan,	Action previously assessed as **Structural / Societal 1** in draft RBMP SEA Environmental Report.

	high-level policy direction, monitoring implementation of the plan, and project management.	and project management.	
6.5	**Structural / Societal 2:** An enhanced programme of formal and scheduled monitoring and reporting of progress in respect of the implementation of the RBMP will be put in place.	An enhanced programme of formal and scheduled monitoring and reporting of progress in respect of the implementation of the RBMP will be put in place.	Action previously assessed as **Structural / Societal 2** in draft RBMP SEA Environmental Report.
6.6	*New action arising following Public Consultation*	National Oversight and Audit Commission (NOAC) will include appropriate water quality metrics in Key Performance Indicators for local authorities during the next review of indicators.	The key activity relates to engagement and agreement with NOAC on the inclusion of Key Performance Indicators on water quality for local authorities. This is directly positive for W, BFF, PHH and MA in the short to long term as KPIs provide a tangible target against which the progress in relation to water quality can be monitored and this data can help inform decision making. **No significant negative effects** foreseen on any of the environmental factors as a result of this new measure.
6.7	**Structural / Societal 3:** Provide a continued emphasis on the full range of the regulatory mix, from awareness and education, through to norms and enforcement, with a review undertaken to ensure there is an appropriate balance in the third cycle to ensure a greater emphasis on compliance assurance activity.	Provide a continued emphasis on the full range of the regulatory mix, from awareness and education, through to norms and enforcement, with a review undertaken to ensure there is an appropriate balance in the third cycle to ensure a greater emphasis on compliance assurance activity.	Action previously assessed as **Structural / Societal 3** in draft RBMP SEA Environmental Report.
6.8	**Structural / Societal 4:** Specific capacity building programmes of work to be put in place to encourage the transfer of learning and knowledge.	Specific capacity building programmes of work to be put in place to encourage the transfer of learning and knowledge.	Action previously assessed as **Structural / Societal 4** in draft RBMP SEA Environmental Report.
6.9	**Structural / Societal 5:** Ensure further activation, development and support of local level initiatives (rivers trusts, catchment partnerships).	Ensure further activation, development and support of local level initiatives (rivers trusts, catchment partnerships) in support of the delivery of the RBMP.	Action previously assessed as **Structural / Societal 5** in draft RBMP SEA Environmental Report.
6.10	**Public Participation 5**: An Fóram Uisce to identify the optimum level of engagement with the implementation	The Water Forum to identify and advise the Water Policy Advisory Committee (WPAC) and Minister on the optimum	The key activity will be for the Water Forum to advise the Water Policy Advisory Committee (WPAC) and Minister on relevant

	structures for the WFD as part of their strategic planning process.	level of engagement with the implementation bodies, agencies and structures for the WFD to support implementation of the third-cycle, in accordance with its functions under Article 26 of the 2017 Water Services Act (Number 29).	stakeholder engagement to support the implementation of the 3rd cycle RBMP. Stakeholder engagement is essential for successful implementation and early consideration of any barriers to implementation of the RBMP. This is broadly positive for all environmental receptors in the short to medium term. **No significant negative effects** foreseen on any of the environmental factors as a result of this amendment.
6.11	**Public Participation 4:** Explore opportunities for the development of a national citizen science programme.	Building on the excellent work already undertaken by the EPA, LAWPRO and various other bodies, DHLGH will provide further supports for the development of a National Water focused Citizen Science Strategy for the monitoring of water quality.	Action previously assessed as **Public Participation 4** in draft RBMP SEA Environmental Report.
6.12	**Public Participation 1:** Evaluate the outcome of the Resilience Project for Rivers Trusts to inform future community engagement initiatives.	LAWPRO to evaluate the outcome of the Resilience Project for Rivers Trusts to inform future community engagement initiatives, including on citizen science.	Action previously assessed as **Public Participation 1** in draft RBMP SEA Environmental Report.
6.13	**Public Participation 2:** Examine ways in which further support can be provided for the formation and capacity building of local forums to help identify and implement measures.	LAWPRO to examine ways in which further support can be provided for the formation and capacity building of local forums to help identify and implement measures.	Action previously assessed as **Public Participation 2** in draft RBMP SEA Environmental Report.
6.14	**Public Participation 3:** Increase the level of funding under the Community Water Development Fund.	LAWPRO and DHLGH to review the operation of the Community Water Development Fund with a view to strengthening it.	Action previously assessed as **Public Participation 3** in draft RBMP SEA Environmental Report.
6.15	*New action arising following Public Consultation*	LAWPRO will facilitate public participation in the development of the Catchment Management Work Plans through workshops for the 5 pilot catchments. This will inform the development and implementation of a national approach to public participation to deliver outcomes for water, climate and nature.	The key activity relates to carrying out public participation workshops in five pilot catchments, which will help to inform the development and implementation of a national approach to public participation to deliver outcomes for water, climate and nature. This is broadly positive for all environmental receptors in the short to medium term. **No significant negative effects**

			foreseen on any of the environmental factors as a result of this amendment. .
6.16	*New action arising following Public Consultation*	The public participation pilots will provide learnings (which will then be implemented) on how agencies, local authorities, communities and landowners can work together to support action planning and project co-creation for a combined top-down bottom-up approach to the development and implementation of the 46 Catchment Management Work Plans.	The key activity is for the five pilot public participation workshops to include learnings and recommendations on the public participation aspects of the Catchment Management Work Plans. It also includes the establishment of a committee to design the format of a Community Forum based on stakeholder feedback and pilot findings. This is considered to be broadly positive for all environmental receptors. **No significant negative effects** foreseen on any of the environmental factors as a result of this new measure.
6.17	**Action 2.4(2):** Carry out a review of Local Authority Resources to put in place appropriate resources to support individual local authorities in fulfilling their role in water quality protection and restoration	A review of the wider local authority structures will be progressed to inform future needs in the water area and to identify the appropriate level of resources and involvement required from the sector to meet WFD objectives.	Action previously assessed as **Action 2.4(2)** in draft RBMP SEA Environmental Report.
6.18	**Action 4.3(1):** Progress further studies under the ESRI Joint Research Programme on Water.	The Research Programme on Water will be continued into the third cycle with an emphasis on studies on water governance, economics and behavioural aspects of water protection.	The key activity for this action relates to further studies under the JPI. This is considered to be broadly positive for all environmental receptors. **No significant negative effects** foreseen on any of the environmental factors as a result of this amendment.
6.19	**Action 4.3(2):** Review to be undertaken of the Local Authority Waters Programme and Wider Local Authority Structures to inform their evolution and identify the appropriate level of resources and involvement required from the sector to meet WFD objectives.	Review to be undertaken of the Local Authority Waters Programme to identify necessary resources for the third cycle and beyond to deliver the commitments under the WFD and future RBMPs.	Action previously assessed as **Action 4.3(2)** in draft RBMP SEA Environmental Report. Measure has been amended to the Local Authority Waters Programme alone due to review of the wider local authority resources being included as action 6.17 above.
6.20	**Action 4.3(3):** DHLGH to review the outcomes of the IPA Governance Research	Duplicated action in draft plan. Structural / Societal 6 has been	Action previously assessed as **Action 4.3(3)** in draft RBMP SEA

	programme on Ireland's water governance arrangements and implement their recommendations where appropriate. **Structural / Societal 6**: Review the outcomes of the IPA/EPA Governance Research Programme.	deleted. Review the outcomes of the IPA Governance Research programme on Ireland's water governance arrangements and implement their recommendations where appropriate. ~~**Structural / Societal 6**: Review the outcomes of the IPA/EPA Governance Research Programme.~~	Environmental Report.
6.21	**Action 4.3(4):** Carry out an assessment of the Agricultural Sustainability Support and Advisory Programme (ASSAP) to review, examine, evaluate, comment and report on the rationale, efficiency, effectiveness and sustainability of ASSAP to date, along with recommendations for the future and its role and objectives under the third-cycle plan.	Implement the recommendations of the External Expert assessment of the Agricultural Sustainability Support and Advisory Programme (ASSAP) during the third-cycle.	The key activity relates to the implementation of the recommendations of the External Expert assessment of ASSAP. It includes agreement on Terms of Reference, review and report on the recommendations and finally to action the recommendations. The new Water EIP will provide an important mechanism for implementing many of these recommendations. This is considered broadly positive for all environmental receptors. **No significant negative effects** foreseen on any of the environmental factors as a result of this amendment. .
6.22	**Action 2.5(1):** Strengthening water protection provisions where necessary in relevant sectoral policies. These include water services policy, spatial planning policy, agricultural policy and aquaculture policy.	Water protection provisions in relevant sectoral policies will be strengthened, where necessary. These include; water services policy, spatial planning policy, agricultural policy and aquaculture policy.	Action previously assessed as **Action 2.5(1)** in draft RBMP SEA Environmental Report.
6.23	**Action 2.5.(2):** Identifying and embedding measures that will deliver multiple policy objectives (e.g. water, biodiversity and climate adaptation/mitigation) into sectoral policies.	Measures that will deliver multiple policy objectives (e.g. water, biodiversity and climate adaptation/mitigation) will be identified and embedded into sectoral policies.	Action previously assessed as **Action 2.5(2)** in draft RBMP SEA Environmental Report.
Deleted	**Action 2.4(9):** A multiagency group under the NTIG to continue a forum to co-ordinate efforts for implementation of Nature-	~~**Action 2.4(9):** A multiagency group under the NTIG to continue a forum to co-ordinate efforts for implementation of Nature-based Catchment~~	Group concluded and published reports in 2021 which are available on catchments.ie.

	based Catchment Management.	~~Management.~~ Deleted	

5.3.7 Public and Stakeholder Engagement

RBMP Action No.	Draft RBMP Action No. and Wording	Final RBMP Action Wording [Blue text / strikethrough denotes significant changes]	Assessment of Effects and Requirement for Mitigation
7.1	*New action arising following Public Consultation*	*Create opportunities for young people to engage, upskill and use their voice for sustainable development, through Youth-led and youth-focused groups, organisations and networks.*	The key action here is the creation of opportunities to support engagement of young people in citizen science to promote biodiversity and environmental protection. This will have positive effects for PHH, W and BFF in particular in the short to longer term. Engagement with a wide stakeholder base offers the greatest opportunity to harness a stewardship approach to Irelands waters. **No significant negative effects** foreseen on any environmental factor as a result of this new measure.

5.3.8 Economic Analysis of Water Use

RBMP Action No.	Draft RBMP Action No. and Wording	Final RBMP Action Wording [Blue text / strikethrough denotes significant changes]	Assessment of Effects and Requirement for Mitigation
Econ 1	*New action arising following Public Consultation*	The DHLGH to undertake an evaluation including a stakeholder consultation of the appropriateness of water reuse for agricultural purposes within Ireland and report findings in the next River Basin Management Plan.	The key activity is an evaluation of the appropriateness of water reuse for agricultural purposes by DHLGH which will be subject to public consultation and report on those findings in the next RBMP. This is considered broadly positive for all environmental receptors as it will improve the existing evidence base to support the policy decision-making processes. **No significant negative effects** foreseen on any of the environmental factors as a result of this new measure.

Econ 2	**Economic 1:** Prior to confirming the final programme of measures, the most cost effective combination of measures will be analysed.	The cost effectiveness of new supplementary measures, such as the Water EIP and Barriers Mitigation Programme, will be analysed as soon as possible after they have been commenced and once there is sufficient progress made. The programmes will be modified, if and where necessary, to ensure that they are delivering value for money to the State.	The key activity will be analysis of cost effectiveness of supplementary measures. It is acknowledged that the efficient use of funding and resources, as well as assignments across agencies is critical to ensure the measures can be practically implemented over the 3rd RBMP Cycle and beyond. It is important that any analysis of cost effectiveness has regard to total whole life cost. Notwithstanding this, depending on the nature and scale, the supplementary measures may require screening for SEA / EIA and AA as relevant.
Econ 3	**Economic 2:** The economic regulator of water services (the CRU) will continue to assess and approve Irish Water's costs and investment plans. This will include an assessment of Irish Water's investment decisions to ensure effectiveness, efficiency and value-for-money in Irish Water's expenditure. The CRU will continue to monitor and report annually on Irish Water's delivery and performance in that context.	The economic regulator of water services (the CRU) will continue to assess and approve Uisce Éireann's costs and investment plans. This will include an assessment of Uisce Éireann's investment decisions to ensure effectiveness, efficiency and value-for-money in Uisce Éireann's expenditure. The CRU will continue to monitor and report annually on Uisce Éireann's delivery and performance in that context.	Action previously assessed as **Economic 2** in draft RBMP SEA Environmental Report.
Econ 4	**Economic 3:** Irish Water to publish a National Water Resources Plan and to maintain national wastewater capacity registers to ensure security of supply and sufficient capacity in drinking and wastewater networks to allow for balanced regional development in line with the National Planning Framework.	Uisce Éireann to implement the National Water Resources Plan and associated regional plans and to maintain national water and wastewater capacity registers to ensure security of supply and sufficient capacity in drinking and wastewater networks to inform decisions on balanced regional development in line with the National Planning Framework.	Action previously assessed as **Economic 3** in draft RBMP SEA Environmental Report. Measure has been amended to include the reference to associated regional plans and utilisation of national water and wastewater capacity registers to inform planning related decisions. Similar to the NWRP, the regional plans will have direct and indirect positive effects for PHH, W and MA by ensuring safe, adequate water supply, however, there is a potential for direct and indirect negative effects for BFF, LS, CH and LandS from options requiring

			new or increased abstractions and new / upgraded infrastructure depending on the location of projects e.g. proximity to dwellings or European Sites, land-take requirements etc. and the type of works required. Planning of any wastewater or water supply infrastructure, including upgrades, will require screening for SEA / EIA and AA for careful consideration of all potential impacts at project level.
Econ 5	**Economic 4:** Irish Water to continue to implement domestic excess use and non-domestic charging.	When approved, Uisce Éireann to implement domestic excess use and non-domestic charging.	Action previously assessed as **Economic 4** in draft RBMP SEA Environmental Report.
Econ 6	**Economic 5:** Conduct a new economic assessment of the potential for a natural capital/freshwater ecosystem services approach to protecting water resources, including the need for new economic instruments and protection of freshwater and marine ecosystem services.	The Minister will publish a report based on an economic assessment on the potential for a natural capital / freshwater ecosystem services approach to protecting water resources, including the need for new economic instruments and protection of freshwater and marine ecosystem services.	Action previously assessed as **Economic 5** in draft RBMP SEA Environmental Report. This measure has been amended to include reference to the Minister publishing the economic assessment. **No significant negative effects** foreseen on any of the environmental factors as a result of this amendment.
Econ 7	**Economic 6:** Put in place a funding stream to upgrade and take in charge towns and villages without wastewater networks.	The Minister will maintain a funding stream to upgrade and take in charge towns and villages without wastewater networks to improve the wastewater needs of rural villages that are outside of the current Uisce Éireann collection network.	Measure previously assessed as **Economic 6** in draft RBMP SEA Environmental Report. Minor changes to the measure to indicate that the funding stream is now in place and will be maintained. As per assessment in the draft RBMP SEA Environmental Report, the nature of the upgrades is not available at this point to assess further, but all investment decisions must be informed by an SEA/AA screening carried out by the relevant competent authority as appropriate.
Econ 8	**Action 2.4(5):** Irish Water to review and update their Water Services Strategic Plan that	Uisce Éireann will update the current Water Services Strategic Plan to covers the 25	Measure previously assessed as **Action 2.4(5)** in draft RBMP SEA

	covers a 25 year period of water services management.	year period of water services management up to 2050.	Environmental Report.
Econ 9	**Economic 7:** Finalise the review of rural water services and produce a rural water services strategic plan including a national rural water resources plan for the rural water sector. **Action 2.4(6):** The Department, together with the Department of Rural and Community Development, will develop and publish in 2024 a Rural Water Services Strategic Plan for the period 2025 to 2050.	Finalise the review of rural water services and produce a rural water services strategic plan including a national rural water resources plan for the rural water sector. ~~**Action 2.4(6):** The Department, together with the Department of Rural and Community Development, will develop and publish in 2024 a Rural Water Services Strategic Plan for the period 2025 to 2050.~~	Measure previously assessed as **Economic 7** in draft RBMP SEA Environmental Report. Action 2.4(6) of the draft plan was deleted due to duplication with Econ 9 of the final plan.
Econ 10	*New action arising following Public Consultation*	Implement the policy as set on in "Irish Water – Towards a national, publicly-owned, regulated water services utility" so that Uisce Éireann has integrated the day to day operation and delivery of water services into its own organisational structure, in place of the current Service Level Agreements, on a phased basis.	The key activity is the implementation of policy Irish Water – Towards a national, publicly-owned, regulated water services utility by Uisce Éireann which clarifies the Government's views and expectations around the next phase of transformation in the Water Sector. *Our Shared Future*, the Programme for Government, includes a commitment to *"Retain Irish Water in public ownership as a national, standalone, regulated utility".* The Programme also commits to ensuring that Irish Water (now Uisce Éireann) is sufficiently funded to develop plans to ensure security of supply of water resources and to develop sufficient capacity in drinking and wastewater networks to allow for balanced regional development. The objective is to ensure that modern and effective arrangements are in place for the delivery of water services that: - meet the needs and expectations of citizens and users, - comply with domestic and international legal obligations, - represent good value for money, - support the principles of social,

			economic and environmental sustainability, and - are retained in public ownership and control. Through the provision of sufficient funding to develop these plans, commitments may arise to upgrade and provide new water management infrastructure. As with provision of any water infrastructure, there is potential for direct and indirect negative effects on the receiving environment in the short to medium term for BFF, LS, W, CH, LandS and AQ/CF as a result of habitats loss or disturbance from site clearance and construction methods, species disturbance from construction and/or operation of infrastructure, emissions to water from water and wastewater treatment processes and abstractions during the construction phase. Therefore, it is important that any projects and infrastructural developments/upgrades must be subjected to the outcomes of the planning and environmental assessment processes as applicable to avoid any negative environmental effects.
Econ 11	**Action 2.4(4):** Explore the feasibility of establishing a high-level interdepartmental group to develop a comprehensive financing strategy to support the implementation of measures to deliver on the ambitious Water, Climate and Biodiversity objectives committed to in the Programme for Government; and Evaluate the options for accessing appropriate EU funding sources for achieving both WFD and protected area objectives.	Where additional targeted measures are identified as necessary to address gaps in WFD environmental objectives for cycle 3, as part of the mid-term progress review of the Programme of Measures in 2025, DHLGH will oversee the preparation of project proposals for funding under the new Infrastructure, Climate and Nature Fund.	The action has been updated following the announcement of the establishment of an Infrastructure, Climate and Nature fund. The key activity relates to a mid-term review of the Programme of Measures by end of2025, including an assessment and recommendations. In addition, identification of project proposals for funding will be carried out by DHLGH as a part of this review with stakeholder support. The nature of the project proposals is not available at this point to assess further, but all investment decisions must be informed by an SEA/AA screening carried out by the relevant competent authority as appropriate.

6 PREFERRED SCENARIO AND REASONS FOR CHOOSING THE FINAL PLAN

6.1 Introduction

The consideration of alternatives is a requirement of the SEA Directive (2001/42/EC). Article 5(1)[8] states that: '*where an environmental assessment is required under Article 3(1), an environmental report shall be prepared in which the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme, are identified, described and evaluated.*'

The Directive does not prescribe at what stage consideration of alternatives should be undertaken, however, to present a useful input into the plan making process, all guidance points to considering alternatives as early as possible. Guidance also recognises that multiple layers of alternatives may exist, particularly for plans of this nature. Given the nature of the draft Plan, alternatives have been focused primarily on a strategic level.

6.2 Approach to Alternatives for the Draft RBMP

Both the Plan team and the SEA team have also been conscious of the need for iteration in this regard and consideration of alternatives therefore started early in the process. Alternatives were first discussed in relation to SEA scoping. The basis for alternatives discussions was the EPA Guidance: Developing & Assessing Alternatives in SEA.9 This guidance points to four key criteria for identification of alternatives and broad categories of alternatives that might be considered as outlined in Figure 6.1.

In the context of the RBMP the criteria considered were:

- **Realistic:** Do the alternatives have the capacity to deliver the required outcomes from the 3rd cycle plan?
- **Reasonable:** Do the alternatives consider baselines and trends in water quality, do they reflect the legal requirement under inter-related environmental protection legislation such as the Habitats Directive;
- **Viable:** Are the alternatives technically possible and feasible on the ground; and
- **Implementable:** Are the alternatives capable of being put into action, within realistic timeframes, and for which there are adequate resources.

The SEA Scoping Report included a series of high-level considerations on alternatives for discussion and these are reproduced in **Table 6-1**.

Table 6-1: Alternatives proposed for consideration in the SEA Scoping Report

Alternative Type	Description	Example Considerations with respect to the third RBMP
Strategic	*High-level options that achieve a given objective.* *These types are commonly realistic only at policy level.*	• At the strategic level, given the statutory requirement [under both EU and national legislation] for the plan to be reviewed and updated, a do nothing scenario is not considered reasonable. • Changed response [overall or sectorally] based on review of outcomes from cycle 2. • Level of ambition.

[8] Directive 2001/42/EC on the assessment of effects of certain plans and programmes on the environment, EC 2001.

[9] Developing and Assessing Alternatives in SEA, EPA 2015.

Alternative Type	Description	Example Considerations with respect to the third RBMP
Value and Effects Oriented	*Alternatives that address policy priorities, cultural values or safety issues Such alternatives are most appropriate for addressing public perceptions, concerns and values.* *Alternatives that address issues identified during scoping. Such alternatives are effective at mitigating potential significant effects.*	• Public participation and engagement. • Sectoral prioritization e.g. fisheries, agriculture, forestry etc. • Whole country versus action areas approach • Sectoral controls.
Spatial	*Alternative locations for the implementation of planning objectives.*	The scope of the RBMP will not specify geographically where measures will be applied.
Modal	*Different technical/ mode alternatives to achieve the same objective*	Different methods to achieve improvements, for example: • Legal; • Administrative; • Protection measures / restoration measures; • Financial; • Education / awareness / training; and • Related research and development
Sectoral and/ or Temporal Prioritisation	*Alternatives that look at sectoral feasibility and needs at the strategic level, policies can be formulated to promote one sector versus another.* *Alternatives for the timing of implementation of plan/ programme measures.* *These are most suitable at the local level for addressing infrastructure development.*	Alternatives that look at sectoral and temporal feasibility could include: • Consideration of alternatives which are not currently feasible in this fourth iteration of the plan but may become feasible/ economically viable in the future.



Figure 6.1: Criteria for Alternatives and Categories Considered [Source: EPA Guidance, 2015]

The types of alternatives considered are summarised in **Table 6-2** and these largely reflect the issues raised as part of the scoping process.

Table 6-2: Alternatives proposed in the Scoping Report

Alternative Type	Considerations with respect to the 3rd Cycle RBMP
Strategic	• At the strategic level, given the statutory requirement [under both EU and national legislation] for the plan to be reviewed and updated, a *do nothing* scenario is not considered reasonable. • Focus on roll out of cycle 2, allowing time for measures to show full effect or changed response [overall or sectorally] based on review of outcomes from cycle 2.
Effects oriented	• Water focus or multiple benefits for climate, biodiversity etc. also public participation and engagement. • Collaboration led or regulation led base • Focus on restoring to at least good status or restoration and protection measures

6.3 Assessment Parameters

The approach used for assessing alternatives for the draft Plan was an objectives-led assessment. Each alternative has been assessed against a set of strategic environmental assessment objectives. The assessment compares the likely impacts in terms of the Strategic Environmental Objectives to see how alternatives perform in relation to the stated environmental objectives.

For the purposes of the assessment of alternatives:

- Plus (+) indicates a potential positive environmental impact;
- Minus (-) indicates a potential negative environmental impact;
- Plus/minus (+/-) indicates that both positive and negative environmental impacts are likely or that in the absence of further detail the impact is unclear; and
- Zero (0) indicates neutral or no environmental impact.

The following notation is used in the assessment tables:

Symbol	Meaning
Plus (+)	Indicates a potential positive environmental impact
Minus (-)	Indicates a potential negative environmental impact
Plus/minus (+/-)	Indicates that both positive and negative environmental impacts are likely or that in the absence of further detail the impact is unclear
Zero (0)	Indicates neutral or no significant impact

Under each alternative a discussion is presented to support the assessment parameters shown and the reason for choosing the preferred alternative. Assessments include qualitative and where possible quantitative information.

6.4 Strategic Alternatives

6.4.1 Strategic

The strategic issues and alternatives which have been considered are:

- Continue with roll out of 2nd cycle measures; or

- Increase ambition with targets supplementary measures.

Description of Alternative
Strategic Alternative 1: Continue with the 2nd cycle measures up to 2027 to given them sufficient time to show effect based on the level of ambition presented for the 2nd cycle. This recognises that the 2nd cycle had a reduced implementation period from 2018-2021 and a number of the measures intended would not have had sufficient time to fully develop and achieve expected outcomes.
Strategic Alternative 2: Changed response which continued with the 2nd cycle measures to allow sufficient time for their effective implementation but include additional focussed measures based on the improved evidence base following 3rd cycle characterisation with an overall increase in level of ambition.

	PHH	BFF	LS	W	AQ	CF	MA	CH	LandS
Strategic 1	+/-	+/-	+/-	+/-	0	+/-	+/-	0	0
Strategic 2	+	+	+	+	0	+	+	0	0

Key: *PHH: Population & Human Health; BFF: Biodiversity, Flora & Fauna; LS: Land/Soils; W: Water; AQ: Air Quality; CF: Climatic Factors; MA: Material Assets; CH: Cultural Heritage; LandS: Landscape.*

Discussion: Broadly speaking both options are anticipated to give rise to positive effects on environmental receptors however comparatively Strategic Alternative 2 has greater potential to more fully achieve the required WFD objectives within the proposed timescale noting that in both cases it is unlikely that all objectives will be met by 2027.

The second-cycle plan contained 86 individual measures which have been implemented since 2018. An interim assessment of the expected outcomes showed progress in many areas including: Urban waste-water treatment projects; Investment to reduce water leakage; Provision of sustainability advisors; Deployment of technical personnel to regionally-based Local Authority Waters Science and Advisory Team; Inspections under the National Inspection Plan for Domestic Waste Water Treatment Systems; Water abstractions registration and authorisation; and Guidance for planning authorities on physical planning and the Water Framework Directive. However, there is continued sustained decline in water quality suggesting that stronger measures are required to respond. While further progress is anticipated with additional time for the cycle 2 measures, the existing measures will not achieve the necessary outcomes. Without this, mixed outcomes are anticipated for many of the SEOs as some improvement and further declines are anticipated.

Based on detailed technical evidence generated by the EPA, local authorities, IFI and other state agencies over the first two management cycles, there is now sufficient evidence to provide reliable estimates of the scale of mitigation measures required to significantly improve water quality and where those measures should be deployed. These estimates are based on the principle of identifying the optimum location to target measures. Strategic Alternative 2 would therefore include the implementation of eleven existing EU Directives and the new mandatory measures from Cycle 1, the supplementary measures put in place in Cycle 2 and additionally proposed new and enhanced measures to deliver the objectives of the WFD in full and to contribute to other environmental priorities including biodiversity and climate mitigation & adaptation including enforcement, governance, training, resourcing among others. These additional supports are anticipated to increase the level of ambition possible under Cycle 3 and move Ireland closer to achieving the objectives of the WFD for all waterbodies in due course.

Preferred Environmental Alternative and Reason for Choosing: The preferred environmental alternative in this instance is Strategic Alternative 2. Broadly speaking both alternatives are anticipated to give rise to positive effects on environmental receptors as they seek to achieve the WFD objectives in a timely manner. However, the appraisal has highlighted that the level of ambition in the 2nd cycle plan may not have been sufficient to achieve the required objectives in all relevant water bodies by 2027.

6.4.2 Effects Orientated

The effects issues and alternatives which have been considered are:

- Water quality focus or multiple benefits for climate, biodiversity etc. [**Section 6.4.2.1**];
- Collaboration led or regulation led basis [**Section 6.4.2.2**];
- Focus on policy measures at the national level or catchment level [**Section 6.4.2.3**]
- Focus on restoration measures to achieve at least good status or restoration and protection measures [**Section 6.4.2.4**].

6.4.2.1 Water Quality or Multiple Benefits Focus

Description of Alternatives
Benefits Alternative 1: Focus measures on achievement of WFD objectives only.
Benefits Alternative 2: Broaden focus of measures in the RBMP to achieve co-benefits where possible e.g. use of nature-based sustainable urban drainage to provide sustainable water management, improvement in flood risk, recreational opportunities and biodiversity enhancement.

	PHH	BFF	LS	W	AQ	CF	MA	CH	LandS
Benefits Alternative 1	+	+	+	+	0	+/0	+/-	0	0
Benefits Alternative 2	+	+	+	+	+	+	+	+	+

Key: *PHH: Population & Human Health; BFF: Biodiversity, Flora & Fauna; LS: Land/Soils; W: Water; AQ: Air Quality; CF: Climatic Factors; MA: Material Assets; CH: Cultural Heritage; LandS: Landscape.*

Discussion: The RBMP sets out the actions needed to improve water quality and achieve 'good' ecological status in water bodies (rivers, lakes, estuaries, and coastal waters) by 2027 in line with the requirements of the WFD. In addition to improving overall water quality, sustainable water management is also central to addressing the challenges associated with climate change and facing biodiversity.

Benefits Alternative 1 is anticipated to give rise to direct long term positive impacts for W with direct and indirect positive effects for water dependant BFF, LS, PHH and MA. This will arise from improvements to water quality, restoration of aquatic habitat, protection of soils, and investment in new and improved water treatment. The approach will contribute to compliance with the WFD. Benefits Alternative 2 is anticipated to result in similar effects, but further enhancements are also anticipated for PHH, BFF, LS, AQ, CF, CH and LandS. This will arise from targeted measures with proven co-benefits. Examples could include use of nature based sustainable drainage solutions which can deliver water quality improvements, address flooding issues, and provide additional habitat for biodiversity, including improving habitat linkages. Delivery of well-designed and suitably located greenways and blueways could offer improved recreational opportunities for communities while also providing improved ecological coherence of the Natura 2000 network and encourage the management of features of the landscape which are of major importance for wild fauna and flora.

It is noted that in the 2nd cycle plan, alternatives considered the level of ambition of the 2nd cycle plan in relation to available resources. There was a gap between the preferred environmental alternative and the scenario brought forward into the plan. Both alternatives provide for implementation of existing and supplementary measures, utilisation of new approaches to deliver measures, improved implementation structures and new structures for public and stakeholder engagement. However, the preferred environmental alternative was not constrained by the ability of related Government Departments and agencies to commit the substantial additional resourcing [financial and staffing]. The alternative brought forward into the plan however recognised that this committed resource was not in place to achieve full ambitions and instead a prioritisation was required in line with committed available resources.

As there is emergence from the COVID-19 pandemic, this tension between resource availability and level of ambition remains a feature of the 3rd cycle albeit with a 2020 Programme for Government which contains a significantly more ambitious programme for the environment. It commits to, among other things: continued investment in wastewater infrastructure to protect waterways; continued assistance in upgrades to domestic wastewater treatment systems, including septic tanks; expansion of the Agricultural Sustainability Support and Advisory Programme among others. Under the 'Green New Deal' Mission a range of actions is outlined including for; water, natural heritage and biodiversity, climate and environmental emissions.

Given the reality of resource constraints it is therefore even more important to use the available resources efficiently. This requires coordination of policy and focussed delivery of proven co-benefits from key policy areas. Ensuring consistent policy integration between the River Basin Management Planning process and other national and local plans is an ongoing issue. This involves linking the third cycle plan objectives with inter-related plans such as the Climate Adaptation Plans, Marine Spatial Planning, Flood Risk Management Plans, Biodiversity Action Plans objectives etc. However, it is noted that the effectiveness of Benefits 2 will be compromised where conflicts with other government policy are not also addressed in parallel.

Preferred Environmental Alternative and Reason for Choosing: The preferred alternative is Benefits 2. Many of the measures needed to protect and improve water quality can also deliver benefits for nature, air quality and climate change - the Water Framework Directive with its catchment-based planning approach is positioned to capture these multiple benefits to contribute to climate change mitigation and to enhancing biodiversity.

6.4.2.2 Collaboration Led or Regulation Led

Description of Alternatives
Governance Alternative 1: Reliance on regulation of activities across all sectors to reduce pressures and impacts on water bodies in order to achieve compliance with WFD
Governance Alternative 2: Increased level of coordination and collaborative work by all implementing bodies at national, regional and catchment levels to reduce pressures and impacts on water bodies in order to achieve compliance with WFD using an integrated catchment management approach.

	PHH	BFF	LS	W	AQ	CF	MA	CH	LandS
Governance Alternative 1:	+/-	+/-	+/-	+	0	0	+/-	0	0
Governance Alternative 2:	+	+	+	+	0	0/+	+	0/+	0/+

Key: *PHH: Population & Human Health; BFF: Biodiversity, Flora & Fauna; LS: Land/Soils; W: Water; AQ: Air Quality; CF: Climatic Factors; MA: Material Assets; CH: Cultural Heritage; LandS: Landscape.*

Discussion: The WFD establishes a legal framework to protect and restore clean water across Europe and to ensure its long-term, sustainable use. It is linked to a number of other EU directives in several ways. These include directives relating to the protection of biodiversity (Birds and Habitats Directives), specific uses of waters (drinking water, bathing waters and urban waste water directives) and those concerned with the regulation of activities undertaken in the environment (Industrial Emissions and Environmental Impact Assessment directives). The Nitrates Directive also forms an integral part of the WFD and is one of the key instruments in the protection of waters against agricultural pressures.

All these directive have been transposed in Ireland, however, despite this, in the most recent assessment by the EPA, slightly more than half (54%) of Irelands water bodies are considered to be 'at risk' of not meeting mandatory environmental objectives by 2027. The principal causes of the decline in Ireland's water quality are the increasing loss of polluting nutrients from farmland into water; inadequately treated waste water and physical impacts on water bodies (for example, the interruption of river continuity due to river barriers). Climate change, population growth and urbanisation are each adding to the pressures on water resources and water services infrastructure. It is recognised that implementation of regulatory regimes arising out of the existing EU Directives continual efforts to secure full environmental compliance and to increase enforcement

(where appropriate) is essential. However greater coordination and collaborative work at lower tiers of planning, notably through integrated catchment planning is also identified as a necessary tool.

The Governance Alternative 1 is anticipated to give rise to direct medium to long-term positive impacts for W as a key action in preventing further deterioration is the continued enforcement of compliance. This will have indirect positive effects for PHH, BFF, LS and MA where water quality is protected and/ or restored. However, trends in water quality indicated that despite current levels of enforcement declines in water quality are still a significant trend for Ireland and compliance with legislative requirements is a feature. Continuing with existing enforcement and compliance approaches, it is likely some water bodies will see a decline in status over the plan period and beyond with resulting short, medium and long-term negative effects for W and indirectly for PHH, BFF, LS and MA unless additional supports [funding, levels of resourcing and enhanced enforcement regimes] are in place.

Governance Alternative 2 is anticipated to give rise to short, medium and long-term direct positive effects on W with indirect effects for PHH, BFF, LS and MA as well as potential indirect positive effects for CH and LandS. These positive effects are anticipated to arise due to improved collaboration and coordination at the waterbody level. This would be achieved though greater opportunities for public participation and engagement of key stakeholders and sectors at a local level. The structures put in place during the second cycle of the river basin management planning provide a basis for this collaborative process, centred on An Fóram Uisce and the water community teams of the Local Authority Waters Programme and down to local community groups on the ground. Both vertical and horizontal integration are necessary to encourage better participatory governance which is characteristic of integrated catchment management models[10]. This type of engagement can rebalance from a purely governance / functional approach of public bodies to a one that recognises place-based approaches that are adaptive to local contexts and local stakeholders[11].

Preferred Environmental Alternative and Reason for Choosing: Governance Alternative 2 is the preferred alternative. It will encourage an increase in the level of coordination and collaborative work by all implementing bodies at national, regional and catchment levels, making optimal use of existing and enhanced governance structures and resources. Local government has a key leadership role in the stewardship of water catchments and of particular importance is clarity about the respective roles of Local Authority Waters Programme and to put in place appropriate resources to support individual local authorities in fulfilling their role in water quality protection and restoration.

6.4.2.3 Focus on Policy and Measures at the National Level or Catchment / Sub-catchment Level

Description of Alternatives
Scale Alternative 1: Focus on policy and measures at a national scale.
Scale Alternative 2: Focus on measures at a catchment or sub-catchment scale.

	PHH	BFF	LS	W	AQ	CF	MA	CH	LandS
Scale Alternative 1:	+/-	+/-	+/-	+/-	0	0	+/-	0	0
Scale Alternative 2:	+/-	+/-	+/-	+/-	0	0	+	0	0

Key: *PHH: Population & Human Health; BFF: Biodiversity, Flora & Fauna; LS: Land/Soils; W: Water; AQ: Air Quality; CF: Climatic Factors; MA: Material Assets; CH: Cultural Heritage; LandS: Landscape.*

[10] Rollason, E. Bracken, L.J. Hardy, R.J and Large, A.R.G Evaluating the success of public participation in integrated catchment management . Journal of Environmental Management v228, Dec. 2018

[11] O'Rafferty, S. Public Engagement and Environmental Policy, EPA 2019 https://www.catchments.ie/public-engagement-environmental-policy/

Discussion: Both alternatives offer potential for positive effects for PHH, BFF, W, LS arising from coordinated measures focussed at improving water quality and achieving WFD objectives. The focus of previous cycles has been more toward the national scale approach noted in Scale Alternative 1 within the plan, but it is noted that the scale of characterisation carried out by the EPA to support these national policy measures has been at much lower scales including catchment, sub-catchment and waterbody. It is also noted that the cycle 2 approach significantly altered the governance and implementation structures seen in cycle 1 to better reflect the need for implementation across as well as up and down the hierarchy. Cycle 2 saw a significant increase in resources available on the ground in local areas such as Local Authority Waters Programme (LAWPRO) which contributes to public and stakeholder engagement on implementation of measures at local level and also provides scientific analysis of pressures in the priority catchments. This has allowed for greater understanding of local pressures and local solutions needed to achieve compliance at a waterbody level.

However there remains a gap in Alternative 1 between national measures and targeted waterbody measures. Scale Alternative 2 offers sub-layers of targeted planned intervention which can respond to local needs and characteristics – a move away from *one size fits all* to the *right measure in the right place*. The development of catchment and sub-catchment plans (Scale Alternative 2) has the potential for positive impacts for W, BFF and LS but also for PHH and MA as it can respond to particular combination of local conditions and pressures with targeted measures. Furthermore, it allows for better understanding of issues such as the role unregulated activities may have in waterbodies which may be preventing achievement of WFD objectives or causing deterioration.

Preferred Environmental Alternative and Reason for Choosing: Scale Alternative 2 is the preferred alternative as it offers greater potential to ensure the right measures are targeted in the right place.

6.4.2.4 Focus on Restoration Versus Restoration and No Deterioration

Description of Alternatives
Ambition Alternative 1: Focus on restoration
Ambition Alternative 2: Focus on restoration and no deterioration.

	PHH	BFF	LS	W	AQ	CF	MA	CH	LandS
Ambition Alternative 1:	+/-	+/-	+/-	+/-	0	0	+/-	0	0
Ambition Alternative 2:	+/-	+/-	+/-	+/-	0	0	+/-	0	0

Key: *PHH: Population & Human Health; BFF: Biodiversity, Flora & Fauna; LS: Land/Soils; W: Water; AQ: Air Quality; CF: Climatic Factors; MA: Material Assets; CH: Cultural Heritage; LandS: Landscape.*

Discussion: Both of the Ambition Alternatives 1 and 2 would be anticipated to deliver positive effects for W, BFF, LS and PHH as a result of improvements to water quality however, without targeted focus on prevention of deterioration as well as restoration it is anticipated that current trends will continue i.e. gains will be overshadowed by losses elsewhere. Alternative 2 has potential to ensure a more even trend in outcomes however this will depend on actions being targeted and focussed to the specific water body.

While protect, enhance and restore are all key attributes of the objectives of the WFD, preventing deterioration of the status of all bodies is equally required. The RBMP cycle 1 and cycle 2 measures to date have focussed on restoration to a large extent. Recent EPA water quality reports show some successes in restoring the quality of water bodies. However, these improvements have been overshadowed by an overall net decline in the status of water bodies which would indicate that the preventing deterioration objective is not being met.

The Significant Water Management Issues Consultation Report noted that the second cycle River Basin Management Plan highlighted there were 1460 water bodies that were not meeting their WFD objectives and

the recent monitoring data show that 242 of these water bodies have now achieved their WFD objectives. However, it goes on to report that almost 400 new water bodies are now not achieving their targets. This is of particular concern with regard to high status sites. Over half of the High Status Objective Water Bodies are not meeting their water quality targets. A further 108 High Status Objective Water Bodies have declined in quality since 2016.

The obligation in relation to no deterioration is therefore an essential consideration in the context of the 3rd cycle plan. It is further reinforced by recent case law, including the Court of Justice of the European Union (CJEU) ruling for Case C-461/13 (Bund für Umwelt und Naturschutz Deutschland eV v Bundesrepublik Deutschland (the Weser case)[12]). The CJEU held that Member States must refuse authorisation for an individual project where it might cause a deterioration of the status of a body of surface water or where it jeopardises the attainment of good surface water status or of good ecological potential and good surface water chemical status. The Weser case also ruled that activities which jeopardise the attainment of 'good' overall status are similarly precluded from authorisation. The Court advised that 'deterioration of status' is established as soon as the status of at least one of the quality elements falls by one class, even if the change does not result in a fall in classification of the water body as a whole. A specific focus on the overall objective of no deterioration is required but also a targeted action plan for high-status sites to ensure there is no further losses over the next plan period

Preferred Environmental Alternative and Reason for Choosing: Ambition Alternative 2 is the preferred alternative as it better reflects the requirements and obligations of the WFD.

6.5 Overall Preferred Alternative

Following an assessment of alternatives, the proposed themes for the next Plan were identified. The overall premise is "the right measure, in the right place" supported and delivered by:

- **Integrated catchment planning:** Catchment plans to be put in place for each of the 46 hydrometric catchments as sub-plans to the national Plan. Building over time into fully integrated catchment management plans, the initial level of detail to be included in these plans will be decided based on templates produced by LAWPRO, in consultation with stakeholders. It is envisaged that each Local Authority will also prepare a County level Implementation Plan as part of this process to give action to the objectives of the national and catchment plans. These plans will also provide a basis against which to assess implementation of measures through annual reports.

- **Role clarity and collaborative implementation:** There will be an increase in the level of coordination and collaborative work by all implementing bodies at national, regional and catchment levels, making optimal use of existing and enhanced governance structures and resources. Local government has a key leadership role in the stewardship of water catchments and of particular importance is clarity about the respective roles of Local Authority Waters Programme and to put in place appropriate resources to support individual local authorities in fulfilling their role in water quality protection and restoration.

- **Multiple benefits:** Many of the measures needed to protect and improve water quality can also deliver benefits for nature, air quality and climate change - the Water Framework Directive with its catchment-based planning approach is perfectly positioned to capture these multiple benefits to contribute to climate change mitigation and to enhancing biodiversity.

- **An increased level of ambition:** The third cycle plan will have a high level of ambition, encompass all water bodies with clear strategies to protect water bodies that are still at good status or above and to improve water bodies that are at less than good status.

[12] Case C-461/13.

7 MEASURES TO MONITOR SIGNIFICANT ENVIRONMENTAL EFFECTS OF THE IMPLEMENTATION OF THE ADOPTED RBMP

7.1 Introduction

Article 10 of the SEA Directive requires that monitoring be carried out in order to identify, at an early stage, any unforeseen adverse effects due to implementation of a plan, and to be able to take remedial action. Monitoring is carried out by reporting on a set of indicators, which enable positive and negative impacts on the environment to be measured. The environmental indicators of relevance to the plan were identified from the SEA process. These will be used to identify unforeseen adverse effects from implementation of the plan.

7.2 Responsibility for Monitoring

Monitoring will focus on aspects of the environment that are likely to be significantly impacted by the plan. Where possible, indicators have been chosen based on the availability of the necessary information and to show changes that would be attributable to implementation of the plan.

It is the responsibility of DHLGH to coordinate the monitoring of their plan however it is acknowledged that DHLGH will, to a large extent, rely on existing monitoring programmes managed by other agencies, most particularly the EPA WFD Monitoring Programme. It remains the responsibility of DHLGH to liaise with the relevant data holders to get the data and to ensure that monitoring reports prepared to report on the status of each indicator presented.

It is acknowledged that remediation of any unforeseen effects is likely to require a more integrated response across Departments and Agencies to fully establish the correct policy response should such effects be identified. Table 7-1 presents the proposed Environmental Monitoring Programme.

It is further noted that this monitoring will integrate with and supplement where necessary the extensive existing monitoring programmes already in existence. As reported in the RBMP, Ireland's National Water Quality Monitoring Programme 2022-2027 provides a comprehensive national overview of the ecological and chemical status of surface waters and the quantitative and chemical status of groundwaters. The information is used to track progress towards the achievement of the environmental objectives required by the Water Framework Directive, and those set out in the River Basin Management Plan. The programme is comprised of 2,899 surface and groundwater bodies representing 60% of the total number of national waterbodies, covering 2,429 river waterbodies, 224 lakes, 80 transitional waterbodies, 45 coastal waters, 16 canals and 121 groundwater bodies. The programme is operated by the Environmental Protection Agency, Marine Institute, Inland Fisheries Ireland, Waterways Ireland, National Parks and Wildlife Service and Local Authorities.

Table 7-1: SEA Environmental Monitoring Programme

SEA Issues	Monitoring Requirement	Remedial Actions
Population & Human Health • Water quality as a result of population pressure. • Seafood contamination as a result of poor water-quality.	It is proposed to monitor the following indicators to establish both the effectiveness of the protection policies already incorporated into the RBMP and also any unforeseen effects: • Programmed delivery of Irish Water infrastructure to improve water quality discharges and elimination of raw sewage discharge – compliance with the Urban Wastewater Treatment (UWWT) Directive including the renegotiated version when available [source: Irish Water Remedial Action List (RAL)]. • Levels of contaminants in fish and shellfish caught or harvested in Irish seas for human consumption - compliance with maximum limits listed in EU Regulation 1881/2006 (as amended) [source: MSFD Monitoring Programme].	• Liaison with Irish Water and local authorities (LAs) on further measures needed to achieve compliance with the UWWTD. • Continuous review by Irish Water of the RAL to identify infrastructure and process priorities for addressing insufficient or lack of wastewater treatment and discharges to marine waters. • Control of population growth in areas with insufficient WWT capacity until the issue is remedied.
Biodiversity, Flora and Fauna • Impact on water dependant / connected European sites from sectoral activities • Protection for European sites • Impacts on habitats and species from plan activities in terms of maintenance and / or restoration of barriers.	It is proposed to monitor the following indicators to establish both the effectiveness of the protection policies already incorporated into the RBMP and also any unforeseen effects: • Condition of European sites designated for all waterbodies under the WFD scope or with connectivity to such waterbodies [data source: NPWS (6 yearly reporting)]. • WFD indicators monitored under the WFD monitoring programme for 2022-2027 period.	• Where European sites are showing deterioration, the sites will be reviewed in the context of additional management measures to ensure they can achieve their stated WFD and Conservation Objectives under the Habitats Directive. • If declines in water quality are identified for water dependant European sites, DHLGH will work with stakeholders including NPWS to establish the nature of the barriers e.g. legal, planning, finance etc. and work to overcome these. • Ongoing revision to programme of measures under RBMP rollout.
Land / Soils • Impacts on land use • Increase in nitrates in estuarine areas	• The extent of peat areas fully protected under the Peat PoM. • The decrease in area of commercial forestry adjacent to water bodies. • Levels of anthropogenic N in estuaries.	• Targeted sectoral support for sectors showing increasing trend. • Ongoing revision to programme of measures under RBMP rollout. • Further strengthening of measures to control loss of N from land use practices such as fertilizer application in catchments at risk
Water • Impacts on water quality as a result of sectoral activities.	• Status of water bodies – compliance with the environmental objective under WFD and MSFD as appropriate. [data source: EPA and Marine Institute]. • % reduction in nitrogen losses to waters from agriculture.	• Where water bodies are failing to meet at least good status or are showing deterioration of status this will be investigated with reference to ongoing programme of measures under RBMP rollout. • Where marine water bodies are failing to meet good ecological

SEA Issues	Monitoring Requirement	Remedial Actions
		status/ good environmental status, or are showing a deterioration, this will be investigated with reference to ongoing revision to programme of measures under WFD and MSFD rollout. • Ongoing review and update of RBMP roll-out as required.
Climatic Factors • Reduction in existing and future greenhouse gas (GHG) emissions. • Resilience under future climate change scenarios	• Evidence of multiple benefits or co-benefits from RBMP PoM [data source: DHLGH]. • Cumulative increase in of organic soil rewetting per year [data source: DHLGH]. • Climate change sensitivity analysis or "climate check" results [data source: DHLGH].	• Where measures are shown to be sub-optimal in terms of co-benefits, additional measures will be developed by DHLGH, DECC and other key stakeholders.
Material Assets • Visitor pressure on coastal/ marine areas. • Impacts to water quality as a result of seasonal loading on WWT. • Transboundary impacts.	• Development of catchment plans within the first year of the 3rd cycle of the RBMP [data source: DHLGH]. • Evidence of multiple benefits or co-benefits from RBMP PoM [data source: DHLGH]. • See PHH monitoring for monitoring of the RAL.	• If catchment plans are not developed within the first year of the 3rd cycle of the RBMP, the DHLGH will identify the barriers to progress in consultation with relevant stakeholders with a view to supporting the relevant bodies in partnership. • Continuous review by Irish Water of the Remedial Action List to identify infrastructure and process priorities for addressing insufficient or lack of wastewater treatment and discharges to marine waters. • Ongoing review and update of RBMP roll-out as required.
Cultural Heritage • Impacts on industrial heritage associated with waterbodies e.g. mills	• Application of ESM tool and risk assessment to all projects/ funded actions identified in the RBMP.	• Training of use of the tools for all stakeholders engaged in delivery of projects and actions on the ground. • Ongoing review and update of RBMP roll-out as required.
Landscape • Impacts on protected views or landscapes.	• Application of ESM tool and risk assessment to all projects/ funded actions identified in the RBMP.	• Training of use of the tools for all stakeholders engaged in delivery of projects and actions on the ground. • Ongoing review and update of RBMP roll-out as required.

8 ADDENDUM TO THE ENVIRONMENTAL REPORT

8.1 Chapter 4 Review of Relevant Policies, Plans and Programmes

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

The following graphic is added to Section 4.1 of the Environmental Report



Figure 4-1: WFD interaction with other EU Legislation

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

Section 4.3 has been amended to include the following entry:

Goal 3 Good Health and Wellbeing is also noted as important for the Plan. Target 3.9 states "By 2030, substantially reduce the number of deaths and illnesses from hazardous chemicals and air, water and soil pollution and contamination." The RBMP addresses the issues of water pollution from a range of sources of contamination that can lead to negative health outcomes and is therefore contributing to this target.

Furthermore it is noted that the SDG Good Health and Wellbeing is also referenced in Chapter 6, Table 6.2 as part of the assessment criteria.

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

Section 4.7 has been amended to include the following entry:

The **EU Soil Strategy for 2030** sets out a framework and concrete measures to protect and restore soils and ensure that they are used sustainably. It sets a vision and objectives to achieve healthy soils by 2050, with concrete actions by 2030.

- Medium-term objectives by 2030
  - Combat desertification, restore degraded land and soil, including land affected by desertification, drought and floods, and strive to achieve a land degradation-neutral world (Sustainable Development Goal 15.3)
  - Significant areas of degraded and carbon-rich ecosystems, including soils, are restored
  - Achieve an EU net greenhouse gas removal of 310 million tonnes CO2 equivalent per year for the land use, land use change and forestry (LULUCF) sector
  - Reach good ecological and chemical status in surface waters and good chemical and quantitative status in groundwater by 2027
  - Reduce nutrient losses by at least 50%, the overall use and risk of chemical pesticides by 50% and the use of more hazardous pesticides by 50% by 2030
  - Significant progress has been made in the remediation of contaminated sites
- Long-term objectives by 2050
  - Reach no net land take
  - Soil pollution should be reduced to levels no longer considered harmful to human health and natural ecosystems and respect the boundaries our planet can cope with, thus creating a toxic-free environment
  - Achieve a climate-neutral Europe25 and, as the first step, aim to achieve land-based climate neutrality in the EU by 2035
  - Achieve for EU a climate-resilient society, fully adapted to the unavoidable impacts of climate change by 2050

Following the adoption of this Strategy, in July 2023, the EC adopted a proposal for a Soil Monitoring Law; this would provide a legal framework to help achieve healthy soils by 2050.

8.2 Chapter 5 Relevant Aspects of the Current State of the Environment

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

Section 5.2.3.4 has been amended to replace the existing text (strikethrough) with the following entry:

~~There is no European legislation which focuses on soil, leading to continuous degradation of the land and soils across Europe.~~ Following the adoption of the EU Soil Monitoring Strategy for 2030 in November 2021, EC adopted a proposal for a Soil Monitoring Law in July 2023, that provides a legal framework to help achieve healthy soils by 2050.

SEA STATEMENT

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

Section 5.2.7 has been amended to include the following entry:

Wreck Inventory

The Wreck Inventory of Ireland Database (WIID) holds records of over 18,000 known and potential wreck sites in Irish waters. Wrecks in the database date to all periods; the earliest vessels represented being prehistoric logboats which are primarily found within Ireland's inland waterways

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

Section 5.2.1.4 has been amended as follows:

It is noted that IFI is the primary body for management of certain sport fish and freshwater species of fish while DAFM holds responsibility for sea fishing.

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

Section 5.3 of the Environmental Report has been updated as follows:

In accordance with the SEA Directive, the interrelationship between the SEA environmental topics must be taken into account (**Table 5-8**). The key interrelationships identified in this SEA are set out below. *Examples may be obvious such as the inter-relationship between water and biodiversity through water dependant ecosystems, but it may also be more obtuse e.g. cultural heritage and biodiversity. Many heritage assets provide areas of key habitat in themselves or secondarily through their influence on surrounding landscape character. In the riverine, or canalised environment bridges, banks and historical wreckage can provide discrete areas of special habitat.*

Table 5-8 has also been updated to include the stated inter-action as follows:

Biodiversity, Flora & Fauna								
Population & Human Health	✓							
Land & Soils	✓	✓						
Water	✓	✓	✓					
Air Quality	✓	✓	✗	✓				
Climatic Factors	✓	✓	✓	✓	✓			
Material Assets	✓	✓	✓	✓	✓	✓		
Cultural Heritage	✓	✓	✓	✓	✗	✓	✓	

Landscape	✓	✓	✓	✓	✗	✓	✓	✓	
	Biodiversity Flora & Fauna	Population & Human Health	Land & Soils	Water	Air Quality	Climatic Factors	Material Assets	Cultural Heritage	Landscape

8.3 Chapter 7 Alternatives

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

In response to the consultation feedback, the following text has been added to Section 7.3 of the SEA Environmental Report.

7.3.1 Alternatives Considered in the Second Cycle of the RBMP

An early step in the consideration of alternatives was a reflection on the approach presented in the first and second cycles of the RBMP. While the focus of alternatives in the first cycle was very much directed at the basic measures (a toolkit) to achieve the WFD objectives, for the second cycle a more strategic approach was considered necessary in order to acknowledge and consider the more strategic challenges presented at the national level in achieving the objectives particularly in the context of governance and resourcing. . three alternatives were considered. The first related to business as usual, implementing existing basic and supplementary measures through the existing and application of the Irish Water Investment programme up to 2021. A second scenario sought to apply a prioritised and strategically targeted approach involving additional resourcing within budgetary constraints and a final one sought to apply a more extensive approach without consideration of budgetary constraints or capacity of public authorities to deliver. The preferred alternative recognised the limitations in resources and sought to deliver an alternative that was reasonable, realistic, viable and implementable. The third cycle has built on the gains made in cycle 2 and can now reflect on the better data and tools to inform a targeted approach to deliver the right measure in the right place. Notwithstanding this, the starting point for alternatives in the third cycle still must meet the criteria of reasonable, realistic, viable and implementable.

8.4 Appendix A of the SEA Environmental Report

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

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

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

Appendix A has been amended to include the following entries under **'Regional level plans & programmes'**:

Topic	*Title*	*Summary of Objectives: Regional*
Water and Wastewater	UK Fisheries Act 2020	The Act includes provision in relation to fisheries, fishing, aquaculture and marine conservation; provision about the functions of the Marine Management Organisation; and for connected purposes. It ensures full control of UK's fishing water lies within the remit of UK and aims to strengthen UK's commitment to sustainable fishing.
	Joint Fisheries Statement (2022)	Published in November 2022, the Joint Fisheries Statement sets the direction of UK fisheries management following Brexit, outlining how the fisheries policy authorities of England, Wales, Scotland, and Northern Ireland will meet the eight objectives of the Fisheries Act 2020 to achieve environmental and economic sustainability.
Cultural Heritage	Protection of military remains Act 1986 (UK)	An Act to secure the protection from unauthorised interference of the remains of military aircraft and vessels that have crashed, sunk or been stranded and of associated human remains, and for connected purposes.

APPENDIX 1
Record of Public Participation, Consultations and Social & Digital Media Analytics

Record of Consultation and Participation

As a requirement of Article 14 of the Water Framework Directive (WFD), it is necessary to encourage the active involvement of all interested parties in the implementation of the WFD, in particular in relation to the production, review and updating of River Basin Management Plans. This background document (provided by DHLGH) summarises the steps taken nationally to ensure that the development of the River Basin Management Plan has been produced through consultation and engagement with interested parties. The steps are summarised in three sections on:

1. Consultation;
2. Stakeholder Engagement; and
3. Public access to information.

This information has been provided by the DHLGH.

1. Consultations

Table 1 outlines the consultations on Water Framework Directive that have been undertaken nationally by DHLGH and the key outcomes arising from the consultations to ensure that the River Basin Management Plan has been produced through consultation and engagement with interested part.

Table 1: Consultations on Water Framework Directive

Title	Means of Dissemination	Key Outcomes
Significant Water Management Issues (SWMI)	This document was published on the Department of Housing, Local Government & Heritage (DHLGH) (www.gov.ie) website on 20 December 2019. It was also available on surveymonkey.com Details were highlighted to the main stakeholders. The Department also took out newspaper advertisements and posted regular tweets about the consultation for the general public to participate	This statutory consultation was held during the period 20 December 2019 – 07 August 2020 A total of 169 substantive comments were received A full copy of the responses to the consultation was published on the DHLGH website (www.gov.ie)

Title	Means of Dissemination	Key Outcomes
		Feedback from the consultation will help in developing proposals for the draft third cycle RBMP
Review of the Fourth Nitrates Action Programme	This document was published on the Department of Housing, Local Government & Heritage (DHLGH) (www.gov.ie) website on 23 November 2022 Details were highlighted to the main stakeholders	This consultation was held during the period 23 November 2020 –15 January 2021. A total of 104 substantive comments were received. Feedback from the consultation informed the Draft Fifth Nitrates Action Programme
Draft Fifth Nitrates Action Programme	This document was published on the Department of Housing, Local Government & Heritage (DHLGH) (www.gov.ie) website on 9 August 2021 Details were highlighted to the main stakeholders	This consultation was held during the period 9 August 2021 – 20 September 2021 A total of 616 substantive comments were received Feedback from the consultation informed the Fifth Nitrates Action Programme
Public Consultation on the Strategic Environment Assessment and Natura Impact Assessment for the Draft Fifth Nitrates Action Programme	This document was published on the Department of Housing, Local Government & Heritage (DHLGH) (www.gov.ie) website on 13 December 2021 Details were highlighted to the main stakeholders	This consultation was held during the period 13 December 2021– 26 January 2022 A total of 17 substantive comments were received A full copy of the responses to the consultation was published on the DHLGH website (www.gov.ie). Feedback from the consultation informed the Fifth Nitrates Action Programme.

Title	Means of Dissemination	Key Outcomes
Draft Plan (third cycle RBMP)	This document was published on the Department of Housing, Local Government & Heritage (DHLGH) (www.gov.ie) website on 27 September 2021. It was also available on eusurvey.eu Details were highlighted to the main stakeholders The Department also took out newspaper advertisements and posted regular tweets about the consultation for the general public to participate	This statutory consultation was held during the period 27 September 2021 – 31 March 2022 A total of 1401 substantive comments were received A full copy of the responses to the consultation was published on the DHLGH website (www.gov.ie) Feedback from the consultation will help in developing proposals for the draft third cycle RBMP
Designation of Heavily Modified Water Bodies (HMWBs) for the third RBMP	The technical review of HMWBs was published on the EPA website (www.epa.ie) and also linked to from the Department of Housing, Local Government and Heritage (DHLGH) website on 08 March 2022 Details were highlighted to the main stakeholders	The EPA complete a technical review of the heavily modified water bodies as required under the draft RBMP, with the assistance of the Hydromorphology Working Group Public consultation was held by the EPA on the review and its outcomes during the period 08 March 2022 – 15 May 2022 The outcomes of this consultation and the EPA's letter to the Department of Housing, Local Government and Heritage are available on the EPA website (www.epa.ie)
Guidelines for the Incorporation of the Water Framework Directive into the Planning System	This document will be published on the Department of Housing, Local Government & Heritage (DHLGH) (www.gov.ie) website in 2024, following consultation. Details will be highlighted to the main stakeholders	This statutory consultation will be held in 2024. Feedback from the consultation will help to finalise the guidelines for publication A full copy of the responses to the consultation will be published on the DHLGH website (www.gov.ie) once they have been assessed.

2. Stakeholder Engagement for Ireland's River Basin Districts

Table 2 below is a catalogue of scheduled meetings in which DHLGH engaged with stakeholders. This is not a definitive account of all engagement within this reporting cycle, as many more less formal, ad hoc forms of engagement took place.

Table 2: Scheduled Meetings Between DHLGH and Stakeholders

Meeting Details	Attendees (with DHLGH)	Areas for Discussion
19 October 2021 Venue: Zoom Conference Call	An Fóram Uisce SWAN	• Overview of the draft plan • Questions/Discussion
11 November 2021 Venue: WebEx Video Conference	An Fóram Uisce SWAN	• Water, Food and Farming
22 November 2021 Venue: Video Conference Call	SWAN	• Waste Water • Agriculture • Hydromorphology • Continuation of 2nd Cycle Measures • Agriculture Measures for Nitrates • Agriculture Measures for Phosphorus • Input into the third RBMP •
07 December 2021 Venue: Zoom Conference Call	An Fóram Uisce SWAN	• Governance and Implementation • IPA Research Outcomes
17 January 2022	EPA	• The Water Advisory Unit from the Department of Housing, Local Government and Heritage, provided an overview of the event and introduced those that were

Meeting Details	Attendees (with DHLGH)	Areas for Discussion
Venue: Virtual Stakeholder Event (hosted by CrowdComms)	LAWPRO DAFM Irish Water NFGWS Marine Institute Local Authorities Waterways Ireland NWRA An Fóram Uisce NIEA An Taisce IFI An Bórd Pleanála OPW Teagasc SWAN GSI CCMA	speaking on the day • An opening address from Darragh O'Brien, T.D., Minister for Housing, Local Government and Heritage • DHLGH spoke on an overview of the draft River Basin Management Plan • EPA gave a presentation on the scale of the challenge – informing the level of ambition and the environmental objectives • LAWPRO spoke on an expanded Focus for the Areas for Action • LAWPRO also advised on the development of Local Catchment Plans • A Q&A panel discussion took place on everything spoken about in the first half of the event • DAFM highlighted the area of Agriculture - CAP Strategic Plan / Nitrates Action Plan • DHLGH gave a presentation on Hydromorphology – Controlled Activities / Restoration Programme • Irish Water updated the attendees about Urban Waste Water – Capital Investment and Innovative approaches • A second Q&A panel discussion took place on the later presentations • The closing remarks made by Malcolm Noonan, T.D., Minister of State for Heritage and Electoral Reform at the Department of Housing, Local Government and Heritage

Meeting Details	Attendees (with DHLGH)	Areas for Discussion
18 January 2022 Venue: Zoom Conference Call	An Fóram Uisce Irish Water	• Urban Wastewater & the dRBMP 2022-2027 • Input by IW on their Investment Programme for Wastewater collection & treatment and its alignments with the WFD requirements • Questions and discussions on UWWT & RBMP
10 February 2022 Venue: Zoom Conference Call	An Fóram Uisce SWAN	• Overview on hydromorphology • Measures to address pressures on hydromorphology • Questions and discussions from members • Proposed approach/focus of the Forums submission to the consultation
16 February 2022 Venue: Webinar	Irish Environmental Network and Sustainable Water Network Webinar	• Will the proposed plan work • SWAN recommendations to fix the Plan • Water Governance & Public Participation • Agriculture • Urban Wastewater • Physical Modifications (& Integration with land use planning) • Forestry • High Status Waters • Coastal & Transitional Waters
07 March 2022 Venue: WebEx Video Conference	NFGWS	• NFGWS sectors contribution to RBMP • NFGWS role as a lead organisation for specified catchments • Crossover between RBMP and the MARWP – Measure 1 source protection
08 March 2022 Venue: Zoom Video Conference	An Fóram Uisce	• Questions and Discussions around the area of Forestry

Meeting Details	Attendees (with DHLGH)	Areas for Discussion
22 March 2022 Venue: Webinar	National Federation of Group Water Schemes World Water Day Event	• LAWPRO spoke about the current state of Ireland's water bodies and what group schemes are doing to help • Teagasc's ASSAP and Irish Water both spoke on Pesticides • Malcolm Noonan TD, Minister of State for Heritage and Electoral Reform at the Department of Housing, Local Government and Heritage spoke on the draft RBMP
31 March 2022 Venue: Custom House, Dublin	Ministerial engagement with An Fóram Uisce	• Initial comments on consultations to date • Update on LAWPRO's consultation process • Overview of the Forums submission on the Draft RBMP • Discussion & Questions with the Ministers & Forum members
03 May 2022 Venue: Custom House	An Fóram Uisce	• Development of the Final RBMP • Governance Arrangements • Options for an outcomes-based approach to the plan • Public participation • Pressures
23 May 2022 Venue: Custom House, Dublin	Meeting between Minister O'Brien and the Chair of An Fóram Uisce	• Role and focus of the Forum in the next 3 years • Forum's new Strategic Plan 2022-2027
29 June 2022 Venue: Spencer Hotel	Catchment Management Standing Committee Workshop with Water Advisory Section - DHLGH on the Water Forum's dRBMP recommendations	• Governance, Outcomes & Public Participation • Key Pressures on Urban Wastewater • Key Pressures on Agriculture • Key Pressures on Hydromorphology • Key Pressures on Forestry • Steps to finalising the plan
17 November 2022 Venue: Custom House,	An Fóram Uisce	• Response to the forums recommendations to the Forums letter sent to WPAC dated 3rd November 2022 • Update from the DHLGH on timelines for completion of the RBMP

Meeting Details	Attendees (with DHLGH)	Areas for Discussion
Dublin		
18 November 2022 Venue: WebEx Video Conference	SWAN	• Greater ambition and targeted actions • Stronger water governance & implementation • More meaningful and effective public participation • Agriculture • Urban Wastewater • Forestry • Physical modifications • Coastal and Transitional issues
02 December 2022 Venue: Zoom Conference Call	An Fóram Uisce	• A review of the impact of the Forums letter to WPAC on the 3rd November, with a 'traffic light' assessment of the Forum's recommendations, based on interpretation of the response from the DHLGH / EPA • Follow up recommendations, outlining a number of measures that require written commitment in the final RBMP • Discussion around Forestry
14 February 2023 Venue: Zoom Conference Call	An Fóram Uisce	• Briefing by the DHLGH on the updated Programme of measures with a focus on how they address AFU's recent recommendations from Dec 2022. • Update on the timescale for completion of the RBMP and opportunities for engagement with AFU.
29 November 2023 Venue: Zoom Conference Call	Water Policy Advisory Committee (WPAC)	• High level comments / feedback from draft final RBMP circulated to WPAC • RBMP and Programme of Measures – key areas mentioned in the feedback: • Governance & Implementation of Measures • Public participation • Agriculture • Hydromorphology • Forestry • Urban Wastewater

Meeting Details	Attendees (with DHLGH)	Areas for Discussion
		• Other pressures / measures
10 January 2024 Venue: Zoom Conference Call	An Fóram Uisce	• Response to AFU submission on RBMP text • Feedback from AFU on RBMP text

3. Bilateral Engagements

In preparation of the final RBMP, DHLGH and the PoMDT met with the following organisations to discuss specific measures for inclusion. This is outlined below in Table 3.

Table 3: DHLGH and the PoMDT Meeting

Meeting Details	Attendees (with DHLGH)	Areas for Discussion
03 February 2020 Venue: Custom House	EPA	• 3rd cycle plan • 2nd cycle progress • Bathing Water
30 March 2020 Venue: Zoom Conference Call	IFI EPA LAWPRO	• The Prioritisation Process • Physical Changes to Surface Waters / Hydromorphology • Siltation • Invasive Alien Species
07 April 2020 Venue: Video Conference	DAFM EPA LAWPRO	• The Prioritisation Process • Land-use Planning • Agriculture • Climate Change • Pollution of Waters (phosphorus & nitrogen) • Physical Changes to Surface Waters / Hydromorphology • Siltation • Public Health / Drinking Water Quality
07 April 2020 Venue: Video Conference	Irish Water EPA LAWPRO	• The Prioritisation Process • Climate Change • Pollution of Waters (phosphorus & nitrogen) • Physical Changes to Surface Waters / Hydromorphology • Public Health / Drinking Water Quality • Urban Pressures

Meeting Details	Attendees (with DHLGH)	Areas for Discussion
	IW	
08 April 2020 Venue: Video Conference	DAFM EPA LAWPRO	• The Prioritisation Process • Agriculture • Public Health / Drinking Water Quality • Hazardous Chemicals
08 April 2020 Venue: Video Conference	OPW EPA LAWPRO	• The Prioritisation Process • Climate Change • Physical Changes to Surface Waters / Hydromorphology • Urban Pressures • Siltation
14 April 2020 Venue: Video Conference	Teagasc DAFM LAWPRO EPA	• The Prioritisation Process • Agriculture • Climate Change • Pollution of Waters (phosphorus & nitrogen) • Physical changes to Surface Waters / Hydromorphology • Siltation • Public Health / Drinking Water Quality
24 April 2020 Venue: Video Conference	DCCAE EPA LAWPRO DCCAE	• The Prioritisation Process • Climate Change • Agriculture • Physical Changes to Surface Waters / Hydromorphology • Public Health / Drinking Water Quality • Urban Pressures

Meeting Details	Attendees (with DHLGH)	Areas for Discussion
14 May 2020 Venue: WebEx Video Conference	EPA LAWPRO Dairy Industry Ireland Dairy Sustainability Ireland	• The Prioritisation Process • Climate Change • Agriculture • Pollution of Waters (phosphorus & nitrogen) • Siltation
15 May 2020 Venue: WebEx Video Conference	NPWS EPA LAWPRO	• The Prioritisation Process • Climate Change • Pollution of Waters (phosphorus & nitrogen) • Physical Changes to Surface Waters / Hydromorphology • Siltation • Public Health / Drinking Water Quality • Invasive Alien Species • Urban Pressures
19 May 2020 Venue: WebEx Video Conference	ESB EPA LAWPRO	• The Prioritisation Process • Public Participation • Climate Change • Agriculture and Nutrient pollution • Physical Changes to Surface Waters / Hydromorphology
19 May 2020 Venue: WebEx Video Conference	Waterways Ireland EPA LAWPRO	• The Prioritisation Process • Physical Changes to Surface Waters / Hydromorphology
21 May 2020 Venue: WebEx Video	DAFM Forest Service	• The Prioritisation Process • Climate Change • Agriculture

Meeting Details	Attendees (with DHLGH)	Areas for Discussion
Conference	EPA LAWPRO	• Physical Changes to Surface Waters / Hydromorphology • Siltation
21 May 2020 Venue: WebEx Video Conference	An Fóram Uisce EPA LAWPRO	• The Prioritisation Process • Public Participation
22 May 2020 Venue: WebEx Video Conference	HPRA (Health Products Regulatory Authority)	• Hazardous Chemicals
27 May 2020 Venue: WebEx Video Conference	Coillte EPA LAWPRO	• The Prioritisation Process • Agriculture • Climate Change • Physical Changes to Surface Waters / Hydromorphology • Siltation
29 May 2020 Venue: WebEx Video Conference	Bórd Na Mona EPA LAWPRO	• The Prioritisation Process • Climate Change • Siltation
16 June 2020 Venue: WebEx Video Conference	CCMA EPA	• The Prioritisation Process • Public Participation • Land-use Planning • Climate Change • Pollution of Waters (phosphorus & nitrogen)

Meeting Details	Attendees (with DHLGH)	Areas for Discussion
	LAWPRO	• Physical Changes to Surface Waters / Hydromorphology • Siltation • Public Health / Drinking Water Quality • Invasive Alien Species • Urban Pressures •
30 June 2020 Venue: WebEx Video Conference	CRU EPA LAWPRO	• The Prioritisation Process • Pollution of Waters (phosphorus & nitrogen) • Public Health / Drinking Water Quality • Urban Pressures
08 July 2020 Venue: WebEx Video Conference	Department of Agriculture, Environment and Rural Affairs / NI Environmental Agency NIEA EPA LAWPRO	• The Prioritisation Process
18 January 2021 Venue: WebEx Video Conference	DAFM (Assistant Secretary level)	• Measures to address waste-water • Measures to address agriculture
19 January 2021 Venue: WebEx Video Conference	IFI EPA LAWPRO	• 3rd Cycle RBMP – Potential measures arising from the Fish Barriers Programme

Meeting Details	Attendees (with DHLGH)	Areas for Discussion
22 January 2021 Venue: WebEx Video Conference	DAFM (Aquacultures) EPA LAWPRO	• Overview of the work of the Aquaculture & Foreshore Management Division • Possible measures for inclusion in the draft third-cycle river basin management plan
26 February 2021 Venue: Video Conference	An Fóram Uisce EPA LAWPRO	• Overview of the draft plan • Questions/Discussion
18 March 2021 Venue: WebEx Video Conference	IFI EPA LAWPRO	• Proposed barrier prioritisation and mitigation programme • Update on tasks / timelines
14 May 2021 Venue: WebEx Video Conference	An Fóram Uisce EPA LAWPRO	• Questions/Discussion
07 July 2022 Venue: WebEx Video Conference	DAFM (Agricultural Pollution) EPA LAWPRO	• Impacts from agriculture on water quality • GAP Analysis • Policy objectives and level of ambition • Planning measures at water body level, assigning responsibilities, implementation, monitoring and evaluation

Meeting Details	Attendees (with DHLGH)	Areas for Discussion
12 July 2022 Venue: WebEx Video Conference	Irish Water EPA LAWPRO	• Impacts from agriculture on water quality • GAP Analysis – Urban Waste Water • Policy objectives and level of ambition • Planning measures at water body level, assigning responsibilities, implementation, monitoring and evaluation
01 September 2022 Venue: WebEx Video Conference	DAFM (Forestry) EPA LAWPRO	• Impacts from forestry on water quality • WFD and Forest Licencing • GAP Analysis • Planning measures at water body level, assigning responsibilities, implementation, monitoring and evaluation
15 September 2022 Venue: WebEx Video Conference	DECC / IFI EPA LAWPRO	• Impacts from Hydromorphology on water quality • GAP Analysis – Hydromorphology • Planning measures at water body level, assigning responsibilities, implementation, monitoring and evaluation

4. Social and Digital Media Analytics

The objective of the Departments media campaign was to encourage the public to participate in the public consultation on the Draft River Basin Management Plan.

As LAWPRO is engaging local groups and communities throughout the country, the aim of the Department's campaign was to generate awareness of the consultation at the national level, and more broadly on the importance of water to the nation, reflecting the Department's high ambitions to improve water quality.

Members of the public could participate in the consultation process between 27 September 2021 and March 31, 2022. The public could submit a consultation in two ways: to LAWPRO, likely to express views on local water issues, or directly to the Department. In the previous consultation in 2017, approx. 1000 submissions were made to LAWPRO and 600 directly to this Department. The aim of this campaign was to equal or better that number. In total, 1401 submissions were received into the Department with a further 450 received by LAWPRO.

Ads ran on Twitter, Facebook and Instagram.

On Twitter, the DHLGH ran two animated videos. The two tweets generated 250,100 impressions and 103,827 link clicks (to gov.ie/rmbp).

Six Newspaper ads both mid-week and weekend including Seachtain (midweek):

- Seachtain
- Sunday Business Post
- Sunday Independent
- Irish Independent
- Irish Examiner
- Irish Times

Table 4: DHLGH Stats for Social & Digital Media

Channel	Stats	Rationale
Local Press	6 national newspaper publications	To raise awareness of the importance of water, and the ambitions of the 3rd plan in the largest newspapers to maximise expose to the consultation
Twitter	2 animated videos 250,100 impressions 103,827 link clicks	Awareness-generation amongst our existing followers and reach beyond our own engaged audiences to generate awareness of the consultation
Facebook and Instagram	1,900,953 impressions 838,291 clicks	Awareness-generation amongst our existing followers and reach beyond our own engaged audiences to generate awareness of the consultation
Core Programmatic Campaign	1,299,359 impressions 688 clicks	To drive traffic to the landing page and generate awareness of the consultation
Virtual Consultation Room	National Stakeholder Event 873 total views of the event 232 unique views of the event	More high level detail for a highly engaged audience
Online Submission / Survey Form	1,401 submissions	Ensuring both local input along with key stakeholders input for the final decision development

Table 5: LAWPRO Stats for Social & Digital Media

Channel	Stats	Rationale
Local Press	64 Press Releases 41 Meeting Adverts	Total Readership 1,851,676 people
Local / Regional Radio	21 sets of radio adverts	Total audience 3,286,000
Facebook and Instagram	Reach 79,141 Total clicks 14,264	Promotion of VCR and link to portal
Facebook and Instagram	Reach 1,051,638 Total clicks 45,507	Promotion of local meeting and link to registration page
Virtual Consultation Room	6,100 unique visits	Public consultation and engagement during Covid-19 restrictions
Online Submission / Survey Form	450 local submissions	Ensure local input into decision making process

APPENDIX 2
Consultation Summary Report (Responses from DHLGH)

Consultation Report Summary

In conjunction with the publication of the draft third-cycle River Basin Management Plan (RBMP) a 6-month long public consultation took place from the 27th September 2021 to the 31st March 2022 to gather feedback and further insight from members of the public and stakeholders. 1,401 submissions were received by the DHLGH through a combination of the Department's on-online survey and direct email.

The review of the received submissions was undertaken by RPS on behalf of the DHLGH, who identified 259 of the submissions as unique content.

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

Thirty-eight themes were identified across the 259 submissions reviewed. These submissions were initially categorised as submissions based on:

1. Consultation Response Questionnaire issued by the DHLGH (161);

2. Template response (original emanating from the Sustainable Water Network (SWAN), a network of environmental NGOs) (1172); and

3. Individual 'free style' responses from a cross section of stakeholders (68).

This document seeks to address the issues and concerns raised by the various stakeholders as part of the public consultation process for the draft RBMP and highlight how these have been addressed or mitigated in the published River Basin Management Plan 2022 – 2027.

CONSULTATION RESPONSES

1. Consultation Response Questionnaire issued by the DHLGH

Section 2.3- What we want to achieve

What are your views on the proposed themes and the key actions for delivering an increased level of ambition for the third River Basin Management Plan?

Summary of consultation response:

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

Recommendations within Submissions:

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

How is this being addressed in the plan?:

The Programme of Measures identifies the individual actions listed under each of the specific pressures on water quality. Each measure is assigned to a lead organisation, with a delivery timeframe, which will report on its progress to the RBMP Project Delivery Office (PDO). The Programme of Measures is being supported by the implementation of catchment management plans by LAWPRO for each of the 46 catchments.

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

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

How is this being addressed in the plan?:

The EPA completed a technical review of the heavily modified water bodies as required for the Draft River Basin Management Plan. The work was carried out with the assistance of the Hydromorphology Working Group, with particular engagement with those public bodies that are carrying out the specified uses, such as Irish Water, the OPW, ESB, Waterways Ireland and representatives from a rural and an urban Local Authority.

The review found that, on the basis of the current specified uses, the number of water bodies meeting the technical criteria for designation has increased substantially from 33 to 466. The increase is due largely to improved data and assessment tools, and a better understanding of the process as described in recent EU guidance. A technical document outlining the assessment, together with the list of candidate waterbodies, is available on the EPA website. In response to consultation on the Heavily Modified Waterbody Review the EPA received 20 submissions. The Minister for Housing, Local Government & Heritage must now decide on whether to designate or de-designate water

bodies as HMWBs, from the 466 water bodies which the EPA has found to meet the criteria for designation, taking into account the recommendations of the EPA and the key concerns raised in the submissions to the consultation process.

See Section on '*Artificial and Heavily Modified Waterbodies'* in the text of the plan for further information.

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

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

Recommendations within Submissions:

1) Additional and more targeted measures should be included within the Plan. Monitoring programme has to be more specific.

2) All proposed measures in the Plan should be 'climate proofed' under a range of emissions climate and emissions scenarios out to 4°C warming.

3) The use of nature-based solutions should be increased within proposed measures throughout the Plan to increase climate resilience. Nature based solutions e.g., regenerative farming should be adequately resourced and given statutory footing in relevant legislation.

4) Restoration targets and measures for depleted habitats should also be included

How is this being addressed in the plan?:

1. The Programme of Measures identifies the individual actions listed under each of the specific pressures on water quality. Each measure is assigned to a lead organisation, with a delivery timeframe, which will report on its progress to the Project Delivery Office. The Programme of Measures is being supported by the implementation of catchment management plans by LAWPRO for each of the 46 catchments.

2. The Programme Delivery Office will engage with implementing bodies on the development of an agreed process for carrying out a 'Climate Check', with the implementing bodies to report back on their climate checks conducted on their assigned measures.

3. & 4. Since the publication of the draft RBMP considerable collaboration has taken place across government and relevant agencies to develop and implement measures which will deliver multiple policy objectives for water, biodiversity and climate action. This has been a core objective in relation the new agricultural CAP Strategic Plan as well as actions in the planning system, particularly to enhance Nature based solutions for urban runoff. The following additional action has been identified with the intention of delivering multiple policy objectives, where the Cabinet Subcommittee on Environment and Climate Change will further seek to enhance cross government and agency collaboration in delivering habitat restoration measures with multiple policy benefits for water, biodiversity and climate.

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

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

How will this be addressed in the plan?:

The Programme of Measures identifies the individual actions listed under each of the specific pressures on water quality. Each measure is assigned to a lead organisation, with a delivery timeframe, which will report on its progress to the Project Delivery Office. The Programme of Measures is being supported by the implementation of catchment management plans by LAWPRO for each of the 46 catchments.

For the first time, since the river basin management process began in cycle 1 (2010-2015), we now have estimates of the scale of mitigation measures required to significantly improve water quality and most importantly where those measures should be deployed. These estimates are based on detailed technical evidence generated by the EPA, local authorities, Inland Fisheries Ireland and other state agencies over the first two management cycles. They are also based on the principle of identifying the optimum locations to target measures. Referred to as the 'right measure in the right place', these are based on the most up to date scientific information. Under the plan key actions in preventing further deterioration in water quality include; increased compliance through enhanced environmental enforcement and awareness as well as policies that embed water protection.

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

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

Recommendations within Submissions:

1) Water governance must be made transparent and participative and must be brought into compliance with the Aarhus Convention. The make-up and work of WPAC etc. must be readily accessible, including where water management decisions are being made.

2) The public must be involved from the start in the development of action plans for their local waters through the 46 nationwide Catchment Management Plans. This process must have expert facilitation, with catchment groups resourced to ensure effectiveness, equity and inclusiveness. The fragmented water governance system must also be fixed with a consolidated Water Act, similar to the Climate Act, with budgets, timelines and sanctions in order to mainstream water protection in government policy alongside climate and biodiversity action.

How is this being addressed in the plan?:

1. The Programme Delivery Office will support the implementation of the Plan across Departments, Local Authorities, EPA and other key agencies and stakeholders, and will provide clarity and direction to the various implementation bodies and coordinate the implementation of actions contained in Programme of Measures where each action will be assigned a lead body responsible for their implementation and an agreed date of delivery. The Project Delivery Office will also coordinate publication of progress reports, to ensure effective implementation of these actions, which will clearly and comprehensively set out performance against targets, to allow for increased stakeholder engagement. The publication of these reports will be managed through a dedicated Campaign Site and will also be used to facilitate communications and stakeholder engagement on issues regarding the RBMP and water quality.

2. Public participation will be included in the development of the 46 Catchment Management Plans through the establishment of Catchment Community Fora. The Programme of Measures contains an action where the National Technical Implementation Group will examine issues which are causing declines in water quality and will establish topic based working groups as necessary to identify any evidence, legislative, policy or implementation gaps which need to be addressed with the aim of enhancing the protection of water quality and preventing declines.

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

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

How is this being addressed in the plan?:

The projected expenditure for the 3rd cycle RBMP from 2023 to 2027 is a conservative minimum of €516million. This is a 71% increase on the estimated expenditure for cycle 2 (2015-2021). However, this investment may be increased by government as a more precise picture emerges at the local level through the 46 Catchment Management Plans regarding the measures needed and as more accurate estimates of the cost of measures are made. This plan commits to review progress with the implementation of measures and to reanalyse the distance to environmental targets.

Under the European Union (Waste Water Discharge) Regulations 2007 to 2020, the EPA authorises waste water discharges from waste water works serving agglomerations owned by, vested in, controlled or used by Uisce Éireann. The EPA ensures that waste water discharges are controlled according to the combined approach (Article 10). Where monitoring or other data indicate that the environmental objectives set for a body of water are unlikely to be achieved, the EPA ensures that the cause(s) of the possible failure are investigated and relevant authorisations are examined and reviewed as appropriate.

See Section '*Coastal Issues'* in the text of the plan for further information on measures regarding transitional/coastal waters.

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

Overall, there are concerns about lack of transparency and ambition in the plan. It is not clear how unhealthy/at risk waterbodies will be restored/protected. The lack of clear lines of reporting, enforcement and funding are of serious concern. Measures must be specific, measurable and time-bound with a responsible body assigned and accountable
It has been suggested that all responsibility for water quality should be with EPA as LAWPRO are not an enforcement agency therefore cannot take responsibility for actions within a given catchment area. LA and NFGWs are not resourced to take actions in a catchment, at the moment legislation is not enforceable in a consistent fashion.

Recommendations within Submissions:

1) In particular relation to shellfish producers, they are recommending that UV treatment for all major outfalls/overflow points for human sewage should be installed along with SCADA monitoring on all sewage overflows. The data should be made available to the public.

2) Greater enforcement on slurry practices (illegal) an action taken on illegal developments that have associated human sewage discharges should be immediately dealt with.

How is this being addressed in the plan?:

Recommendation 1: All wastewater discharges are controlled by either licences or consents issued by the EPA.

Recommendation 2: The Programme of Measures in the RBMP contains the following action in relation to agricultural pressures:

- The local authority inspection and enforcement process under the Nitrates Action Programme has been increased and more strongly focused to target farms in waterbodies most at risk of impacting water quality. These inspections will include some derogation farms.
- Department of Agricultural Food and the Marine are inspecting 10% (increase from 5%) of derogation farms per annum with a stronger focus also on targeting waterbody that pose the greatest risk to water quality.

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

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

Key stakeholders such as shellfish businesses should be included in the decision-making process of any plan/project/licence application from the very beginning and no plan/project that has the potential to

add extra pressure to the already deteriorating waterbody should not be allowed. Cumulative impacts must at all times be assessed.

Recommendations within Submissions:

1) WFD implementation must be made transparent and participative and must be brought into compliance with the Aarhus Convention.

2) The public must be involved from the start in the development of action plans to ensure effectiveness, equity and inclusiveness.

3) The Department of Housing must publish a comprehensive programme for public engagement in the RBMP process.

4) Suggest that an online portal be established to allow local stakeholders to make submissions to regulators in relation to abuses of waterbodies witnessed and breaches of legislation.

5) A key recommendation would be to tie in water quality to Biodiversity in the plan, as this is more tangible to the public and more evocative.

6) Also recommended that a standardised simple water quality sign or 'badge' for each bridge in our towns to raise awareness of quality and what is acceptable for the plan. Similar to blue flag system for beaches.

How is this being addressed in the plan?:

1. The Programme Delivery Office (PDO) will support the implementation of the Plan across Departments, Local Authorities, EPA and other key agencies and stakeholders, and will provide clarity and direction to the various implementation bodies and coordinate the implementation of actions contained in Programme of Measures where each action will be assigned a lead body responsible for their implementation and an agreed date of delivery. The Project Delivery Office will also coordinate publication of progress reports, to ensure effective implementation of these actions, which will clearly and comprehensively set out performance against targets, to allow for increased stakeholder engagement. The publication of these reports will be managed through a dedicated Campaign Site and will also be used to facilitate communications and stakeholder engagement on issues regarding the RBMP and water quality.

2. & 3. Public participation will be included in the development of the 46 Catchment Management Plans through the establishment of Catchment Community Fora.

4. Further information concerning making an environmental complaint is available on the EPA website: https://www.epa.ie/our-services/compliance--enforcement/whats-happening/make-an-environmental-complaint/

5. Since the publication of the draft RBMP considerable collaboration has taken place across government and relevant agencies to develop and implement measures which will deliver multiple policy objectives for water, biodiversity and climate action. This has been a core objective in relation the new agricultural CAP Strategic Plan as well as actions in the planning system, particularly to enhance Nature based solutions for urban runoff. The following additional action has been included in the Programme of Measures with the intention of delivering multiple policy objectives, with the Cabinet Subcommittee on Environment and Climate Change will further seek to enhance cross government and agency collaboration in delivering habitat restoration measures with multiple policy benefits for water, biodiversity and climate.

6. In the 3rd Cycle, there will be a strong emphasis on and a specific section dedicated to blue dots programme in each of the 46 catchment management plans which will be developed. Pilot community

fora will be established to inform the development of local initiatives specifically for blue dot waters. Restoration and protection measures will be advanced in all areas for action containing blue dot catchments. There will be a strong emphasis on engagement and awareness raising, focusing firstly on the key sectoral stakeholders who have the most impact on blue dots and on communities within blue dot catchments.

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

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

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

Recommendations within Submissions:

1) To introduce WFD specific risk assessments for all intensive farms.

2) Derogation stocking rates should only be permitted if it can demonstrate no impact on WFD objectives, for at risk farms regulatory voluntary and combined measure should be implemented.

3) Certain sub catchments should be zoned ineligible for stocking rates based on catchment carrying capacity,

4) Certain sub-catchments should be zoned ineligible for certain stocking rates,

5) Existing drainage ditches and channels directly linked to rivers should be vegetated and mechanisms installed to slow water ingress to rivers.

6) Upland management must include preservation of natural vegetation and water retention must be prioritized through preservation of blanket bogs.

7) Machinery operators should be prioritized for education on protection for water courses during agricultural works. Operators should be liable for damage to water quality and integrity of riverbanks.

How is this being addressed in the plan?:

The Programme of Measures in the RBMP contains the following action in relation to agricultural pressures:

- The local authority inspection and enforcement process under the Nitrates Action Programme has been increased and more strongly focused to target farms in waterbodies most at risk of impacting water quality. These inspections will include some derogation farms.
- Department of Agricultural Food and the Marine are inspecting 10% (increase from 5%) of derogation farms per annum with a stronger focus also on targeting waterbody that pose the greatest risk to water quality.

- The Nitrates Action Programme Interim Review will be assessing the water quality changes between 2020-2022. In waterbodies where there is a decline in water quality or where a water body is not meeting its environmental objective the European Commission has stipulated that the Nitrates derogation limit of 250 kg N/ha will be reduced to 220 kg N/ha from 2024.

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

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

Recommendations within Submissions:

1) A WFD-specific assessment in advance of developments potentially impacting waterbodies e.g., dredging; drainage; flood protection. Projects can only go ahead if it can be demonstrated that WFD objectives will not be compromised.

2) A prohibition on wetland drainage and commitment to a national wetland restoration programme.

3) A review of the impacts of arterial drainage; and a commitment to review and amend the Arterial Drainage Act 1945 to remove the requirement to maintain drainage and to bring it into compliance with EU environmental law.

4) Full integration of water management in the upcoming Land Use Plan committed to by government, so that catchment- and nature-based approaches are central to it.

5) Licenced Dredging activities (in particular plow dredging in shellfish areas) needs to be reviewed as it has a proven detrimental impact on shellfish health, quality, disease risk and mortality rates.

How is this being addressed in the plan?:

1. WFD specific assessment has been drafted. Further consultation on these guidelines has been deferred pending the enactment of the Planning and Development Bill 2022 revising and updating the Planning and Development Acts to ensure that the draft guidance reflects the most up-to-date legal position. The Bill is currently subject to pre-legislative scrutiny in Dail Éireann.

2. Currently, there is no plan for a national prohibition of wetland drainage. However, the National Peatlands Strategy aims to provide a long-term framework within which all peatlands within the State can be managed responsibly. In addition, with the goal of rehabilitating 33,000 hectares of peatlands, Bord na Mona's Enhanced Decommissioning Rehabilitation and Restoration Scheme (EDRRS) is one of the largest of its kind in Europe.

3. A review of the Arterial Drainage Act 1945 will be undertaken as part of the proposed new National Hydromorphology Programme, which will be overseen by the Hydromorphology Expert Group.

C1 – Public

4. Nature-based solutions are encouraged (in the absence of legislative requirement for their use) in the draft WFD Planning Guidance.

5. This is outside of the remit of this plan and will be covered by the new government agency MARA.

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

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

What will the costs be? A natural capital approach will demonstrate these costs and benefits very clearly. Has a list of areas for action been compiled and will this be available for public consultation? Responsibility shouldn't fall to the OPW only it should be collaborative among NPWS, EPA and IFI for monitoring and managing.

Recommendations within Submissions:

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

How is this being addressed in the plan?:

1. The proposed new National Hydromorphology Programme will mitigate hydromorphological pressures on a case-by-case basis depending on the type of hydromorphological pressure encountered.

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

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

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

Recommendations within Submissions:

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

How is this being addressed in the plan?:

1. Under the 2014 Forestry Act and enacting legislation, the Minister for Agriculture, Food and the Marine is required to promote and monitor the protection and enhancement of water quality when assessing applications for forestry activities. In doing so, DAFM must ensure that forestry operations

and forest-based activities regulated under the Act are compatible with the requirements of the Water Framework Directive.

For the purposes of supporting the third River Basin Management Plan the DAFM *Forests & Water* document will be reviewed and updated as the Forestry Sector plan supporting the 46 Local Catchment Management Plans.

The updated Forests & Water document will include;

- An assessment of the changes in water bodies identified as being at risk from forestry during the 2nd cycle
- Tabulated actions proposed for the 233 waterbodies at risk from Forestry, outlining what forestry activities are likely to be the cause of the significant pressure and the measures to address these.
- As part of the distance to target analysis process led by the EPA, the impact of sectoral plans, including that for Forestry, will be assessed as part of the preparation of the 46 Local Catchment Plans.

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

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

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

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

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

Recommendations within Submissions:

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

2) Encourage water conservation and demand reduction.

3) Encourage rainwater harvesting and use of rainwater, as a means of easing pressure on other water sources.

4) Encourage the installation of water meters in as many premises as possible, including domestic dwellings, in order to provide an indication of water use and water loss,

5) Require all new buildings to install urine separation toilets, and to arrange to have urine collected for its valuable phosphorus content, so that the phosphorus can be returned to its use as fertiliser.

6) Change completely the attitude of providing as little information as possible about the company's activities; become open, informative and transparent to water users and customers, with the intention of regaining some of the public confidence which it has lost in the previous decade.

How is this being addressed in the plan?:

Recommendation 1: Water leakage is addressed under Uisce Éireann through a national water leakage programme which will be scrutinised under the implementation of the recast Drinking Water Directive with reporting requirements on performance to the EU Commission. UÉ are investing €250million per annum up to the end of 2030 in fixing leaks to provide reliable water supply.

Recommendation 2: Uisce Éireann have an detailed information on water conservation in the home, in businesses and in schools including a water conservation calculator on their website

Recommendation 3: Uisce Éireann provide information on rainwater harvesting on their website.

Recommendation 4: Uisce Éireann and Group Water Schemes have actively installed water meters.

Recommendation 6: The recast Drinking Water Directive requires, where possible, water suppliers to communicate with water users and customers on their water usage.

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

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

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

Recommendations within Submissions:

1) Irish Water's Investment Programme must include necessary work to halt sewage pollution from all waste water treatment plants.

2) Programme of measures to fix all other identified urban waste water pollution.

3) Address pollution from combine sewer overflows including a pollution alert system for public.

4) The use of natural integrated waste water systems should be encouraged in smaller villages to alleviate pressure on receiving waters.

How is this being addressed in the plan?:

Recommendation 1: The RBMP includes actions in the Programme of Measures which highlight Uisce Éireann's continued investment in urban wastewater infrastructure between 2020 and 2027.

Recommendation 2: A new action which reviews the 208 water bodies where urban wastewater has been identified as a significant pressure.

Recommendation 3: The allowable numbers of discharges per annum from SWO's are licensed by the EPA.

Recommendation 4: The actions in relation to the NRRP and research project in the Programme of Measures aim to develop approaches to alleviate pressures on receiving waters from wastewater using Nature Based Solutions.

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

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

Recommendations within Submissions:

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

How is this being addressed in the plan?:

The National Inspection Plan (NIP) for domestic wastewater has been reviewed and there is an increase in the number of inspections carried out each year. There is an action in the plan's Programme of Measures for Local Authorities (LA) to enforce advisory notices issued under the NIP and the Department to issue policy direction to LA regarding advisory notices.

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

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

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

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

How is this being addressed in the plan?:

Building on work already undertaken by the EPA, LAWPRO and various other bodies, DHLGH will provide further supports for the development of a National Water focused Citizen Science Strategy for the monitoring of water quality. This will involve the rollout of the national macroinvertebrate citizen science process developed in the 2nd cycle and development and production of training and citizen science support materials, both of which will be led by LAWPRO. A commitment in the Programme for Government, the Community Water Development Fund, which is managed by LAWPRO will be expanded. The Fund will be further developed and expanded during the 3rd cycle in recognition of the benefit of increased participation of the public in helping to implement the RBMP.

The See It? Say It! phone application, developed by the EPA, helps to collect and direct your environmental concern to the correct local authority so that they can take action and address it. This includes the facility to upload photographs. The See It? Say It! phone app complements the 24 hour National Environmental Complaints Line (NECL) 1850 365 121 where you can also report issues such as backyard burning, fly tipping, water pollution, odours and littering. The phone line is available 24hrs a day, 7 days a week and all calls are answered by dedicated staff who will pass the reported information to the relevant local authorities.

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

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

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

Granting Planning and Licences without the environmental consequences accumulative effects being considered along with progressing plans and projects that do not comply with EU directives will add further water pressures to an already dire situation.
Other significant pressures include peatland drainage, peat extraction, unmonitored silt/settlement ponds, licensed/unlicensed quarries, landfills illegal dumps, fisheries related dredging, agri burning and inappropriate freshwater aquaculture licenses.

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

How is this being addressed in the plan?:

A new '*Coastal Issues'* chapter has been added to the RBMP. In addition to the RBMP, these issues are addressed further in the following ways:

DAFM have provided an update to Part 3 of Ireland's Marine Strategy: Programme of Measures (Article 13), under the Marine Strategy Framework Directive (MSFD). The Marine Strategy Framework Directive (MSFD) aims to achieve Good Environment Status (GES) for all marine waters in Europe,

and to protect the resource base for marine related economic and social activities. Irelands Marine Strategy Part 1 (2020) identified the status of Ireland's marine environment and the gaps to achieving GES. To close these gaps Ireland has revised its Marine Strategy Part 3: Programme of Measures (PoMs); first developed in 2015.

The Maritime Area Regulatory Authority, or MARA, is a new state agency that will be established in early 2023. MARA's functions are set out in the Maritime Area Planning Acts 2021 and 2022, and it will have a key role to play in the new streamlined consenting system for the maritime area, including:

- Assessing Maritime Area Consent (MAC) applications for the maritime area, which are required by developers before development permission can be granted;
- Granting marine licensing for specified activities;
- Compliance and enforcement of MACs, licences and offshore development consents;
- Investigations and prosecutions;
- Administration of the existing Foreshore consent portfolio;
- Fostering & promoting co-operation between regulators of the maritime area.

MARA will be a body under the aegis of the Department of Housing, Local Government and Heritage and will be located in Wexford.

The EPA provide information on water bodies at risk of failing to achieve their WFD objectives due to abstraction pressures on www.catchments.ie.

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

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

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

How is this being addressed in the plan?:

Currently, there is no plan currently for a national prohibition of wetland drainage. However, the National Peatlands Strategy aims to provide a long-term framework within which all peatlands within the State can be managed responsibly. In addition, with the goal of rehabilitating 33,000 hectares of peatlands, Bord na Mona's Enhanced Decommissioning Rehabilitation and Restoration Scheme (EDRRS) is one of the largest of its kind in Europe.

The EPA provide information on water bodies at risk of failing to achieve their WFD objectives due to peat pressures on www.catchments.ie.

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

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

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

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

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

How is this being addressed in the plan?:

The following text has been added to the plan:

The EPA have identified IPC, IE and waste licenced facilities that are considered a significant pressure on water quality under the WFD, and have prioritised them for enforcement. A site specific enforcement plan has been drawn up for each of the sites and the EPA are carrying out detailed investigations to identify what impact a site may be having on water quality. The EPA will continue to track the progress and implementation of the site specific enforcement plans throughout the 3rd cycle of the RBMP.

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

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

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

These need to be also protected to prevent unwanted toxicants from entering them from nearby land. Appropriate funding and support to farmers going forward is key to the protection of drinking water courses. Fencing of watercourses and soil nutrient management should be included in the Good Agricultural Practice Regulations 2022. Appropriate staff with the relevant skill sets and training should

be used for max efficiency as well as support offered to farmers. The recommendations of the NFGWS should be considered with water reuse and conservation looked at.

How is this being addressed in the plan?:

The new Drinking Water Regulations require the sharing of data across national bodies (Local Authorities, EPA, Uisce Éireann) and the Group Water Sector to provide access to environmental information for Drinking Water source protection.

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

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

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

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

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

How is this being addressed in the plan?:

Ten new Biodiversity Officers were appointed in 2022 following an agreement to roll out a Biodiversity Officer Programme in local authorities. In February 2023, funding was approved for the recruitment of a further 11 positions to bring the national total of Biodiversity Officers to 25. In addition, IAS were listed as a priority under the Local Biodiversity Action Fund (for which funding was increased).

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

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

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

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

How is this being addressed in the plan?:

The EU Commission have published a proposal for a Directive of the European Parliament and of the Council to amend Directive 2000/60/EC establishing a framework for Community action in the field of water policy, Directive 2006/118/EC on the protection of groundwater against pollution and deterioration and Directive 2008/105/EC on environmental quality standards in the field of water policy.

The objective of the Directive is to protect human health and the environment from the combined effects of toxic and/or persistent pollutants. Lists of pollutants and relevant quality standards, which are required to be reviewed regularly, are included in the legislation. A revision of the Directives was completed in 2019, which concluded that (i) the lists of pollutants and quality standards required an update and (ii) the coherence, efficiency and effectiveness of the legislation could be improved.

Ireland will work with the European Commission on their proposal to amend the Water Framework Directive and the Surface and Groundwater Directives to update the lists of pollutants and quality standards therein. This work aims to better protect our citizens and our water bodies against hazardous chemicals. This new body of work has been added to the RBMP.

In relation to aquaculture areas, please note the following text which has been added to the plan: DHLGH and DAFM will work collaboratively to consider the current aquaculture licensing guidelines and process in order to ensure that the WFD assessment process is provided for. Following examination, both departments, together with the support of the Marine Institute, will work collectively to update the process/guidelines, if required.

Additionally, it should be noted that for the purposes of improving the protection of shellfish waters, DHLGH will seek to implement a new legislative and management framework for shellfish waters in Ireland. This will include consideration of monitoring, assessment and protection measures.

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

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

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

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

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

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

How is this being addressed in the plan?:

Please note that the following text has been added to the plan: DHLGH and DAFM will work collaboratively to consider the current aquaculture licensing guidelines and process in order to ensure that the WFD assessment process is provided for. Following examination, both departments, together with the support of the Marine Institute, will work collectively to update the process/guidelines, if required.

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

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

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

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

How is this being addressed in the plan?:

DHLGH will seek to implement a new legislative and management framework for shellfish waters in Ireland. This will include consideration of monitoring, assessment and protection measures. It is envisaged that this will take place in the context of the new regional river basin planning structures proposed for the next cycle. It is envisaged that an expert group will be formed as part of this work, which will include relevant organisations as appropriate.

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

Currently the actions do not deliver the aims of the Plan, it is under resourced. A single department agency needs oversight of this to remove the conflicting views between agencies and departments. More training for the Competent Authority and Local Authority on this especially in sensitive

catchments, including monitoring, management, reporting and enforcement. Cross collaboration between sectors is needed. This work should link with the current project being led by the Office of the Planning Regulator (OPR) in conjunction with the Local Authority Services National Training Group (LASNTG) and the County and City Management Association (CCMA) to address training needs within the planning service.

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

Recommendations within Submissions:

1) A WFD-specific assessment in advance of developments potentially impacting waterbodies e.g., dredging; drainage; flood protection. Projects can only go ahead if it can be demonstrated that WFD objectives will not be compromised.

2) A prohibition on wetland drainage and commitment to a national wetland restoration programme.

3) A review of the impacts of arterial drainage; and a commitment to review and

4) Amend the Arterial Drainage Act 1945 to remove the requirement to maintain drainage and to bring it into compliance with EU environmental law.

5) Full integration of water management in the upcoming Land Use Plan committed to by government, so that catchment- and nature-based approaches are central to it.

How is this being addressed in the plan?:

1) WFD specific assessment has been drafted. Further consultation on these guidelines has been deferred pending the enactment of the Planning and Development Bill 2022 revising and updating the Planning and Development Acts to ensure that the draft guidance reflects the most up-to-date legal position. The Bill is currently subject to pre-legislative scrutiny in Dail Éireann.
2) Currently, there is no plan currently for a national prohibition of wetland drainage. However, the National Peatlands Strategy aims to provide a long-term framework within which all peatlands within the State can be managed responsibly. In addition, with the goal of rehabilitating 33,000 hectares of peatlands, Bord na Mona's Enhanced Decommissioning Rehabilitation and Restoration Scheme (EDRRS) is one of the largest of its kind in Europe.
3) A review of the Arterial Drainage Act 1945 will be undertaken as part of the proposed new National Hydromorphology Programme, which will be overseen by the Hydromorphology Expert Group.
4) Amendment of the Arterial Drainage Act 1945 can only occur following review (point 3).
5) Nature-based solutions are encouraged (in the absence of legislative requirement for their use) in the draft WFD Planning Guidance.

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

Adequate investment needs to be addressed and it needs to be made a political as well as an economic finance decision otherwise nothing will happen. The National Federation of Group Water Schemes (NFGWS) has previously suggested that members of this group should be provided with a detailed

roadmap, outlining outputs and deliverables for the group in the medium term. Would like to see a valuation of ecosystem services provided by shellfish farming, particularly through nutrient removal and have it accounted for in any economic assessment of a water body. A natural capital and multiple capitals approach would be useful in highlighting the real dependencies and impacts of seafood sector activities on water quality in comparison to and in combination with other activities. Irish Water proposes the development of a collaborative national catchment modelling capability which would be applied at catchment level to assess the impacts and benefits of a range of potential cross-sectoral interventions in terms of achieving WFD objectives. Global factors create undue influence during planning, therefore the plan with its targeted actions and measures must be resilient.

Recommendations within Submissions:

1) To put in place a funding stream to upgrade and take in charge towns and villages without wastewater networks.

2) Finalise the review of rural water services and produce a rural water services strategic plan including a national rural water resources plan for the rural water sector.

How is this being addressed in the plan?:

1. Programme of Measures contains action in relation to maintaining a funding stream to upgrade and take in charge towns and villages without wastewater networks to improve the wastewater needs of rural villages that are outside of the current Uisce Éireann collection network.

2. Programme of Measures contains action in relation to finalising the review of rural water services and producing a rural water services strategic plan, including a national rural water resources plan for the rural water sector

Section 3.3- Artificial and heavily modified water bodies

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

Summary of consultation response:

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

How is this being addressed in the plan?:

The EPA completed a technical review of the heavily modified water bodies as required for the Draft River Basin Management Plan. The work was carried out with the assistance of the Hydromorphology Working Group, with particular engagement with those public bodies that are carrying out the specified uses, such as Irish Water, the OPW, ESB, Waterways Ireland and representatives from a rural and an urban Local Authority.

The review found that, on the basis of the current specified uses, the number of water bodies meeting the technical criteria for designation has increased substantially from 33 to 466. The increase

is due largely to improved data and assessment tools, and a better understanding of the process as described in recent EU guidance. A technical document outlining the assessment, together with the list of candidate waterbodies, is available on the EPA website.

Section 3.4 – Impacts of Climate Change

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

Summary of consultation response:

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

Recommendations within Submissions:

1) Additional and more targeted measures should be included within the Plan. Monitoring programme has to be more specific.

2) All proposed measures in the Plan should be 'climate proofed' under a range of emissions climate and emissions scenarios out to 4°C warming.

3) The use of nature-based solutions should be increased within proposed measures throughout the Plan to increase climate resilience. Nature based solutions e.g., regenerative farming should be adequately resourced and given statutory footing in relevant legislation.

4) Restoration targets and measures for depleted habitats should also be included

How is this being addressed in the plan?:

In terms of the programme of measures for the third-cycle plan, there is a need to consider the possible effects of climate change when selecting and implementing measures. These measures will need to be resilient to climate change impacts, especially expensive and long-term investments such as large infrastructure projects. The river basin manangement plan seeks to promote nature based solutions whereever possible, both in the rural and urban setting. As a result, a climate change sensitivity analysis or "climate check" will be undetaken for all measures carried out under this plan to test their ability to perform under future climate conditions. This analysis will be undertaken at the level of the local catchment action and management plans and sectoral plans where the details of measures will become clearer. This is to ensure that the actions selected are effective, sustainable and cost efficient under changing conditions.

Since the publication of the draft RBMP considerable collaboration has taken place across government and relevant agencies to develop and implement measures which will deliver multiple policy objectives for water, biodiversity and climate action. This has been a core objective in relation the new agricultural CAP Strategic Plan as well as actions in the planning system, particularly to enhance Nature based solutions for urban runoff.

Section 4 – Implementation of Second Cycle Plan

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

Summary of consultation response:

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

How will this be addressed in the plan?:

The Programme Delivery Office will support the implementation of the Plan across Departments, Local Authorities, EPA and other key agencies and stakeholders, and will provide clarity and direction to the various implementation bodies and coordinate the implementation of actions contained in Programme of Measures where each action will be assigned a lead body responsible for their implementation and an agreed date of delivery. The Project Delivery Office will also coordinate publication of progress reports, to ensure effective implementation of these actions, which will clearly and comprehensively set out performance against targets, to allow for increased stakeholder engagement. The publication of these reports will be managed through a dedicated Campaign Site and will also be used to facilitate communications and stakeholder engagement on issues regarding the RBMP and water quality.

Under the European Union (Waste Water Discharge) Regulations 2007 to 2020, the EPA authorises wastewater discharges from wastewater works serving agglomerations owned by, vested in, controlled or used by Uisce Éireann. The EPA ensures that waste water discharges are controlled according to the combined approach (Article 10). Where monitoring or other data indicate that the environmental objectives set for a body of water are unlikely to be achieved, the EPA ensures that the cause(s) of the possible failure are investigated and relevant authorisations are examined and reviewed as appropriate.

See Section '*Where we stand now – Ireland's Water Quality'* in the text of the plan for further information in relation to water quality.

Please see EPA website for further information in relation to compliance and enforcement matters: https://www.epa.ie/our-services/compliance--enforcement/whats-happening/access-to-epa-information-on-compliance-and-enforcement/

Section 5.3.1 – Implementation / Governance

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

Summary of consultation response:

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

Recommendations within Submissions:

1) Water governance must be made transparent and participative and must be brought into compliance with the Aarhus Convention. The make-up and work of WPAC etc. must be readily accessible, including where water management decisions are being made.

2) The public must be involved from the start in the development of action plans for their local waters through the 46 nationwide Catchment Management Plans. This process must have expert facilitation, with catchment groups resourced to ensure effectiveness, equity and inclusiveness. The fragmented water governance system must also be fixed with a consolidated Water Act, similar to the Climate Act, with budgets, timelines and sanctions in order to mainstream water protection in government policy alongside climate and biodiversity action.

How is this being addressed in the plan?:

The Project Delivery Office will support the existing structures to oversee and coordinate the implementation of actions contained in Programme of Measures where each action will be assigned a lead body responsible for their implementation and an agreed date of delivery. The Project Delivery Office will engage with the implementing bodies on an ongoing basis, documenting the engagement to allow for progress, and any potential issues arising, to be highlighted through the agreed structures. A significant function of the office will be to facilitate continuous engagement between the different strands of the RBMP implementation process, and it will look to increase communication between the various implementation bodies who will contribute to the delivery of the required measures. As part of the evolution of the governance structures during the third-cycle a review of the Terms of Reference of WPAC and the NCMC will be undertaken to refocus their objectives and purpose and to ensure the successful roll out and implementation of the integrated Catchment Plans by providing clarity on roles and responsibilities throughout the governance tiers.

2. LAWPRO will prepare a template for the catchment management plans by early 2024. LAWPRO is trialling a template in five catchments, one in each of the five LAWPRO regions (Border, Midlands & East, South East, South West and West). The pilot process will help develop the catchment management plan framework and will also include developing the data capture requirements. This will ultimately inform the template for the Catchment Management Plans. Public participation will increase over time beginning with the establishment of Pilot Catchment Community Fora (CCF), with the objective of co-designing a framework, which will trial different engagement methods for the establishment of 46 CCF during the lifetime of the 3rd cycle RBMP. The CCF will build further on the capacity within communities to identify and implement measures, with its objective to produce a Community Action Plan. The CCF will also be used to influence the development of the Sectoral Action Plans that will be produced by the implementing bodies to support the delivery of the River Basin Management Plan at a national level.

Section 5.3.2 – Areas for Action

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

Summary of consultation response:

Currently the impression is that the Plan is not compliant with the WFD. It lacks clear funding to monitor therefore progress is hampered. What is required is an urgent overhaul of licences issued by the EPA that discharge directly or indirectly into the estuary shellfish designated waterbody. Stakeholders need more access to decision making. The selection process for the prioritisation process isn't clear, majority

are not in favour of this process. The delineation of transitional/coastal inaccurate, indicating a worse waterbody status for areas that are primarily shellfish waterbodies.

How is this being addressed in the plan?:

The projected expenditure for the 3rd cycle RBMP from 2023 to 2027 is a conservative minimum of €516million. This is a 71% increase on the estimated expenditure for cycle 2 (2015-2021). However, this investment may be increased by government as a more precise picture emerges at the local level through the 46 Catchment Management Plans regarding the measures needed and as more accurate estimates of the cost of measures are made. This plan commits to review progress with the implementation of measures and to reanalyse the distance to environmental targets.

Under the European Union (Waste Water Discharge) Regulations 2007 to 2020, the EPA authorises waste water discharges from waste water works serving agglomerations owned by, vested in, controlled or used by Uisce Éireann. The EPA ensures that waste water discharges are controlled according to the combined approach (Article 10). Where monitoring or other data indicate that the environmental objectives set for a body of water are unlikely to be achieved, the EPA ensures that the cause(s) of the possible failure are investigated and relevant authorisations are examined and reviewed as appropriate.

See Section '*Coastal Issues'* in the text of the plan for further information on measures regarding transitional/coastal waters.

Section 5.3.2 – Areas for Action and Appendix 3

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

Summary of consultation response:

Overall, there are concerns about lack of transparency and ambition in the plan. It is not clear how unhealthy/at risk waterbodies will be restored/protected. The lack of clear lines of reporting, enforcement and funding are of serious concern. Measures must be specific, measurable and time-bound with a responsible body assigned and accountable. It has been suggested that all responsibility for water quality should be with EPA as LAWPRO are not an enforcement agency therefore cannot take responsibility for actions within a given catchment area. LA and NFGWs are not resourced to take actions in a catchment, at the moment legislation is not enforceable in a consistent fashion.

Recommendations within Submissions:

1) In particular relation to shellfish producers, they are recommending that UV treatment for all major outfalls/overflow points for human sewage should be installed along with SCADA monitoring on all sewage overflows. The data should be made available to the public.

2) Greater enforcement on slurry practices (illegal) an action taken on illegal developments that have associated human sewage discharges should be immediately dealt with.

How is this being addressed in the plan?:

The catchment characterisation assessment focuses on identifying the waterbodies that are at risk of not meeting the Water Framework Directive environmental objectives of achieving at least good status. Risk is assessed using the water quality monitoring data, the trends over time and the target

objective. For waterbodies that are At Risk, the assessment also identifies the significant pressures impacting on the waters. Once pressures are determined, measures can then be identified and targeted specifically at these pressures. Local Catchment Assessments are an essential tool in helping to target resources and the selection and implementation of "the right measure in the right place".

The Project Delivery Office will support the existing structures to oversee and coordinate the implementation of actions contained in Programme of Measures where each action will be assigned a lead body responsible for their implementation and an agreed date of delivery. The Project Delivery Office will engage with the implementing bodies on an ongoing basis, documenting the engagement to allow for progress, and any potential issues arising, to be highlighted through the agreed structures. A significant function of the office will be to facilitate continuous engagement between the different strands of the RBMP implementation process, and it will look to increase communication between the various implementation bodies who will contribute to the delivery of the required measures.

The projected expenditure for the 3rd cycle RBMP from 2023 to 2027 is a conservative minimum of €516million. This is a 71% increase on the estimated expenditure for cycle 2 (2015-2021). However, this investment may be increased by government as a more precise picture emerges at the local level through the 46 Catchment Management Plans regarding the measures needed and as more accurate estimates of the cost of measures are made. This plan commits to review progress with the implementation of measures and to reanalyse the distance to environmental targets.

Recommendation 1: Not economically feasible to put UV on all major outfalls / overflows.

Recommendation 2: Reducing the loss of nitrogen to the environment will require tighter regulation of nitrogen fertiliser and slurry inputs to agricultural systems. The Fifth Nitrates Action Programme (NAP) includes the following new measures to address this:

- A national chemical fertiliser sales database for farmers has been established and legislation will be put in place during 2023.
- A livestock excretion banding system is in place from 2023 which is likely to result in some farmers reducing their stocking rate,
- Tighter controls on the application of chemical fertilisers and slurry, including extending the closed period where application to land is prohibited.
- The annual maximum fertilisation rate of nitrogen on grassland has been reduced by 10% with potential for a further reduction of 5% in 2024 based on the outcome of a water quality assessment undertaken as part an of the NAP interim review in 2023.
- Potential for the derogation stocking rate maximum of 250 kg N/ha to be reduced to 220 kg N/ha on farms in waterbodies where the water quality assessment component of the NAP interim review indicates water quality deterioration or risk of deterioration from nutrients.
- Stronger emphasis on risk based inspections and enforcement.

Section 5.3.3 – Public Participation

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

Summary of consultation response:

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

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

Recommendations within Submissions:

1) WFD implementation must be made transparent and participative and must be brought into compliance with the Aarhus Convention.

2) The public must be involved from the start in the development of action plans to ensure effectiveness, equity and inclusiveness.

3) The Department of Housing must publish a comprehensive programme for public engagement in the RBMP process.

4) Suggest that an online portal be established to allow local stakeholders to make submissions to regulators in relation to abuses of waterbodies witnessed and breaches of legislation.

5) A key recommendation would be to tie in water quality to Biodiversity in the plan, as this is more tangible to the public and more evocative.

6) Also recommended that a standardised simple water quality sign or 'badge' for each bridge in our towns to raise awareness of quality and what is acceptable for the plan. Similar to blue flag system for beaches.

How is this being addressed in the plan?:

1. The Programme Delivery Office (PDO) will support the implementation of the Plan across Departments, Local Authorities, EPA and other key agencies and stakeholders, and will provide clarity and direction to the various implementation bodies and coordinate the implementation of actions contained in Programme of Measures where each action will be assigned a lead body responsible for their implementation and an agreed date of delivery. The Project Delivery Office will also coordinate publication of progress reports, to ensure effective implementation of these actions, which will clearly and comprehensively set out performance against targets, to allow for increased stakeholder engagement. The publication of these reports will be managed through a dedicated Campaign Site and will also be used to facilitate communications and stakeholder engagement on issues regarding the RBMP and water quality.

2. & 3. Public participation will be included in the development of the 46 Catchment Management Plans through the establishment of Catchment Community Fora.

4. Further information concerning making an environmental complaint is available on the EPA website: https://www.epa.ie/our-services/compliance--enforcement/whats-happening/make-an-environmental-complaint/

5. Since the publication of the draft RBMP considerable collaboration has taken place across government and relevant agencies to develop and implement measures which will deliver multiple policy objectives for water, biodiversity and climate action. This has been a core objective in relation the new agricultural CAP Strategic Plan as well as actions in the planning system, particularly to enhance Nature based solutions for urban runoff. The following additional action has been included in the Programme of Measures with the intention of delivering multiple policy objectives, with the Cabinet Subcommittee on Environment and Climate Change will further seek to enhance cross government and agency collaboration in delivering habitat restoration measures with multiple policy benefits for water, biodiversity and climate.

6. In the 3rd Cycle, there will be a strong emphasis on and a specific section dedicated to blue dots programme in each of the 46 catchment management plans which will be developed. Pilot community fora will be established to inform the development of local initiatives specifically for blue dot waters. Restoration and protection measures will be advanced in all areas for action containing blue dot catchments. There will be a strong emphasis on engagement and awareness raising, focusing firstly on the key sectoral stakeholders who have the most impact on blue dots and on communities within blue dot catchments.

Section 5.4.1 - Agriculture and water quality management

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

Summary of consultation response:

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

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

Recommendations within Submissions:

1) To introduce WFD specific risk assessments for all intensive farms.

2) Derogation stocking rates should only be permitted if it can demonstrate no impact on WFD objectives, for at risk farms regulatory voluntary and combined measure should be implemented.

3) Certain sub catchments should be zoned ineligible for stocking rates based on catchment carrying capacity,

4) Certain sub-catchments should be zoned ineligible for certain stocking rates,

5) Existing drainage ditches and channels directly linked to rivers should be vegetated and mechanisms installed to slow water ingress to rivers.

6) Upland management must include preservation of natural vegetation and water retention must be prioritized through preservation of blanket bogs.

7) Machinery operators should be prioritized for education on protection for water courses during agricultural works. Operators should be liable for damage to water quality and integrity of riverbanks.

How is this being addressed in the plan?:

The Programme of Measures in the RBMP contains the following action in relation to agricultural pressures:

- The local authority inspection and enforcement process under the Nitrates Action Programme has been increased and more strongly focused to target farms in waterbodies most at risk of impacting water quality. These inspections will include some derogation farms.

- Department of Agricultural Food and the Marine are inspecting 10% (increase from 5%) of derogation farms per annum with a stronger focus also on targeting waterbody that pose the greatest risk to water quality.
- The Nitrates Action Programme Interim Review will be assessing the water quality changes between 2020-2022. In waterbodies where there is a decline in water quality or where a water body is not meeting its environmental objective the European Commission has stipulated that the Nitrates derogation limit of 250 kg N/ha will be reduced to 220 kg N/ha from 2024.

Section 5.4.2 - Natural Rivers and Lakes and River Restoration – Hydro morphology

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

Summary of consultation response:

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

Recommendations within Submissions:

1) A WFD-specific assessment in advance of developments potentially impacting waterbodies e.g., dredging; drainage; flood protection. Projects can only go ahead if it can be demonstrated that WFD objectives will not be compromised.

2) A prohibition on wetland drainage and commitment to a national wetland restoration programme.

3) A review of the impacts of arterial drainage; and a commitment to review and amend the Arterial Drainage Act 1945 to remove the requirement to maintain drainage and to bring it into compliance with EU environmental law.

4) Full integration of water management in the upcoming Land Use Plan committed to by government, so that catchment- and nature-based approaches are central to it.

5) Licenced Dredging activities (in particular plow dredging in shellfish areas) needs to be reviewed as it has a proven detrimental impact on shellfish health, quality, disease risk and mortality rates.

How is this being addressed in the plan?:

1. WFD specific assessment has been drafted. Further consultation on these guidelines has been deferred pending the enactment of the Planning and Development Bill 2022 revising and updating the Planning and Development Acts to ensure that the draft guidance reflects the most up-to-date legal position. The Bill is currently subject to pre-legislative scrutiny in Dail Éireann.

2. Currently, there is no plan currently for a national prohibition of wetland drainage. However, the National Peatlands Strategy aims to provide a long-term framework within which all peatlands within the State can be managed responsibly. In addition, with the goal of rehabilitating 33,000 hectares of peatlands, Bord na Mona's Enhanced Decommissioning Rehabilitation and Restoration Scheme (EDRRS) is one of the largest of its kind in Europe.

3. A review of the Arterial Drainage Act 1945 will be undertaken as part of the proposed new National Hydromorphology Programme, which will be overseen by the Hydromorphology Expert Group.

4. Nature-based solutions are encouraged (in the absence of legislative requirement for their use) in the draft WFD Planning Guidance.

5. This is outside of the remit of this plan and will be covered by the new government agency MARA.

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

Summary of consultation response:

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

What will the costs be? A natural capital approach will demonstrate these costs and benefits very clearly. Has a list of areas for action been compiled and will this be available for public consultation? Responsibility shouldn't fall to the OPW only it should be collaborative among NPWS, EPA and IFI for monitoring and managing.

Recommendations within Submissions:

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

How is this being addressed in the plan?:

1. The proposed new National Hydromorphology Programme will mitigate hydromorphological pressures on a case-by-case basis depending on the type of hydromorphological pressure encountered.

Section 5.4.3 - Forestry

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

Summary of consultation response:

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

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

Recommendations within Submissions:

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

How is this being addressed in the plan?:

Under the 2014 Forestry Act and enacting legislation, the Minister for Agriculture, Food and the Marine is required to promote and monitor the protection and enhancement of water quality when assessing applications for forestry activities. In doing so, DAFM must ensure that forestry operations and forest-based activities regulated under the Act are compatible with the requirements of the Water Framework Directive.

For the purposes of supporting the third River Basin Management Plan the DAFM *Forests & Water* document will be reviewed and updated as the Forestry Sector plan supporting the 46 Local Catchment Management Plans.

The updated Forests & Water document will include;

- An assessment of the changes in water bodies identified as being at risk from forestry during the 2nd cycle
- Tabulated actions proposed for the 233 waterbodies at risk from Forestry, outlining what forestry activities are likely to be the cause of the significant pressure and the measures to address these.
- As part of the distance to target analysis process led by the EPA, the impact of sectoral plans, including that for Forestry, will be assessed as part of the preparation of the 46 Local Catchment Plans.

Since the publication of the River Basin Management Plan for the 2nd cycle of the WFD, the assessment by DAFM of licence applications for key forestry activities including afforestation, forest road construction and tree felling has undergone significant changes, particularly in relation to ecological issues.

Section 5.4.4 - Urban Wastewater

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

Summary of consultation response:

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

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

Some additional attention should also be given to addressing issues such as unfinished estates and abandoned privately developed wastewater services. A site-specific review is suggested as a means to

determine if they can be integrated within existing networks to resolve ongoing issues. Additional financial resource should be provided to address these issues.

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

Recommendations within Submissions:

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

2) Encourage water conservation and demand reduction.

3) Encourage rainwater harvesting and use of rainwater, as a means of easing pressure on other water sources.

4) Encourage the installation of water meters in as many premises as possible, including domestic dwellings, in order to provide an indication of water use and water loss,

5) Require all new buildings to install urine separation toilets, and to arrange to have urine collected for its valuable phosphorus content, so that the phosphorus can be returned to its use as fertiliser.

6) Change completely the attitude of providing as little information as possible about the company's activities; become open, informative and transparent to water users and customers, with the intention of regaining some of the public confidence which it has lost in the previous decade.

How is this being addressed in the plan?:

All wastewater discharges are controlled by either licences or consents issued by the EPA.

1. Water leakage is addressed under Uisce Éireann through a national water leakage programme which will be scrutinised under the implementation of the recast Drinking Water Directive with reporting requirements on performance to the EU Commission. UÉ are investing €250 per annum up to the end of 2030 in fixing leaks to provide reliable water supply.

2. Uisce Éireann have an detailed information on water conservation, including rainwater harvesting, in the home, in businesses and in schools including a water conservation calculator on their website

3. & 4. & 5. The recast Drinking Water Directive requires, where possible, water suppliers to communicate with water users and customers on their water usage.

6. The RBMP includes actions in the Programme of Measures which highlight Uisce Éireann's continued investment in urban wastewater infrastructure between 2020 and 2027. A new action has been included in the Programme of Measures which reviews the 208 water bodies where urban wastewater has been identified as a significant pressure.

Section 5.4.5 - Urban Runoff Pressures

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

Summary of consultation response:

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

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

Recommendations within Submissions:

1) Irish Water's Investment Programme must include necessary work to halt sewage pollution from all waste water treatment plants.

2) Programme of measures to fix all other identified urban waste water pollution.

3) Address pollution from combine sewer overflows including a pollution alert system for public.

4) The use of natural integrated waste water systems should be encouraged in smaller villages to alleviate pressure on receiving waters.

How is this being addressed in the plan?:

1. & 2. The RBMP includes actions in the Programme of Measures which highlight Uisce Éireann's continued investment in urban wastewater infrastructure between 2020 and 2027. A new action is included which reviews the 208 water bodies where urban wastewater has been identified as a significant pressure.

3. The allowable numbers of discharges per annum from SWO's are licensed by the EPA.

4. The actions in relation to the NRRP and research project in the Programme of Measures aim to develop approaches to alleviate pressures on receiving waters from wastewater using Nature Based Solutions.

Section 5.4.6 - Domestic Wastewater Discharges

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

Summary of consultation response:

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

Recommendations within Submissions:

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

How is this being addressed in the plan?:

The National Inspection Plan (NIP) for domestic wastewater has been reviewed and there is an increase in the number of inspections carried out each year. There is an Action in the plan for Local Authorities (LA) to enforce advisory notices issued under the NIP and the Department to issue policy direction to LA regarding advisory notices.

The new Drinking Water Regulations require the sharing of data across national bodies (LA's, EPA, UÉ) and the Group Water Sector to provide access to environmental information for Drinking Water source protection.

1. A new action has been included in the Programme of Measures which reviews the 208 water bodies where urban wastewater has been identified as a significant pressure.

Section 5.4.7 - Unknown Pressures

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

Summary of consultation response:

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

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

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

How is this being addressed in the plan?:

The Programme of Measures for the new plan contains a specific measure on promoting and developing the use of a citizen science strategy through LAWPRO over the course of the third cycle.

The See It? Say It! phone application, developed by the EPA, helps to collect and direct your environmental concern to the correct local authority so that they can take action and address it. This includes the facility to upload photographs.

The See It? Say It! phone app complements the 24 hour National Environmental Complaints Line (NECL) 1850 365 121 where you can also report issues such as backyard burning, fly tipping, water pollution, odours and littering. The phone line is available 24hrs a day, 7 days a week and all calls are answered by dedicated staff who will pass the reported information to the relevant local authorities.

Section 5.4.8 - Other Pressures

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

Summary of consultation response:

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

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

Granting Planning and Licences without the environmental consequences accumulative effects being considered along with progressing plans and projects that do not comply with EU directives will add further water pressures to an already dire situation.
Other significant pressures include peatland drainage, peat extraction, unmonitored silt/settlement ponds, licensed/unlicensed quarries, landfills illegal dumps, fisheries related dredging, agri burning and inappropriate freshwater aquaculture licenses.

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

How is this being addressed in the plan?:

A new 'Coastal Issues' chapter has been added to the RBMP. In addition to the RBMP, these issues are addressed further in the following ways:

DAFM have provided an update to Part 3 of Ireland's Marine Strategy: Programme of Measures (Article 13), under the Marine Strategy Framework Directive (MSFD). The Marine Strategy Framework Directive (MSFD) aims to achieve Good Environment Status (GES) for all marine waters in Europe, and to protect the resource base for marine related economic and social activities. Irelands Marine Strategy Part 1 (2020) identified the status of Ireland's marine environment and the gaps to achieving GES. To close these gaps Ireland has revised its Marine Strategy Part 3: Programme of Measures (PoMs); first developed in 2015.

The Maritime Area Regulatory Authority, or MARA, is a new state agency that will be established in early 2023. MARA's functions are set out in the Maritime Area Planning Acts 2021 and 2022, and it will have a key role to play in the new streamlined consenting system for the maritime area, including:

- Assessing Maritime Area Consent (MAC) applications for the maritime area, which are required by developers before development permission can be granted;
- Granting marine licensing for specified activities;
- Compliance and enforcement of MACs, licences and offshore development consents;

- Investigations and prosecutions;
- Administration of the existing Foreshore consent portfolio;
- Fostering & promoting co-operation between regulators of the maritime area.

MARA will be a body under the aegis of the Department of Housing, Local Government and Heritage and will be located in Wexford.

The EPA provide information on water bodies at risk of failing to achieve their WFD objectives due to abstraction pressures on www.catchments.ie

Section 5.4.9 – Peat

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

Summary of consultation response:

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

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

How is this being addressed in the plan?:

Currently, there is no plan currently for a national prohibition of wetland drainage. However, the National Peatlands Strategy aims to provide a long-term framework within which all peatlands within the State can be managed responsibly. In addition, with the goal of rehabilitating 33,000 hectares of peatlands, Bord na Mona's Enhanced Decommissioning Rehabilitation and Restoration Scheme (EDRRS) is one of the largest of its kind in Europe.

The EPA provide information on water bodies at risk of failing to achieve their WFD objectives due to peat pressures on www.catchments.ie.

Section 5.4.10 - Industry, Mines and Quarries

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

Summary of consultation response:

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

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

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

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

How is this being addressed in the plan?:

The following text has been added to the plan:

The EPA have identified Integrated Pollution Control (IPC), Industrial Emissions (IE) and waste licenced facilities that are considered a significant pressure on water quality under the WFD, and have prioritised them for enforcement. A site specific enforcement plan has been drawn up for each of the sites and the EPA are carrying out detailed investigations to identify what impact a site may be having on water quality. The EPA will continue to track the progress and implementation of the site specific enforcement plans throughout the 3rd cycle of the RBMP.

Section 5.4.11 - Drinking Water Source Protection

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

Summary of consultation response:

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

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

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

How is this being addressed in the plan?:

The new Drinking Water Regulations require the sharing of data across national bodies (LA's, EPA, UÉ) and the Group Water Sector to provide access to environmental information for Drinking Water source protection. The National Inspection Plan (NIP) for domestic wastewater has been reviewed and there is an increase in the number of inspections carried out each year. There is an Action in the plan for Local Authorities (LA) to enforce advisory notices issued under the NIP and the Department to issue policy direction to LA regarding advisory notices.

Section 5.4.12 - Invasive Alien Species

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

Summary of consultation response:

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

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

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

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

How is this being addressed in the plan?:

Ten new Biodiversity Officers were appointed in 2022 following an agreement to roll out a Biodiversity Officer Programme in local authorities. In February 2023, funding was approved for the recruitment of a further 11 positions to bring the national total of Biodiversity Officers to 25. In addition, IAS were listed as a priority under the Local Biodiversity Action Fund (for which funding was increased).

Section 5.4.13 - Hazardous Chemicals in the Aquatic Environment

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

Summary of consultation response:

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

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

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

How is this being addressed in the plan?:

The EU Commission have published a proposal for a Directive of the European Parliament and of the Council to amend Directive 2000/60/EC establishing a framework for Community action in the field of water policy, Directive 2006/118/EC on the protection of groundwater against pollution and deterioration and Directive 2008/105/EC on environmental quality standards in the field of water policy.

The objective of the Directive is to protect human health and the environment from the combined effects of toxic and/or persistent pollutants. Lists of pollutants and relevant quality standards, which are required to be reviewed regularly, are included in the legislation. A revision of the Directives was completed in 2019, which concluded that (i) the lists of pollutants and quality standards required an update and (ii) the coherence, efficiency and effectiveness of the legislation could be improved.

Ireland will work with the European Commission on their proposal to amend the Water Framework Directive and the Surface and Groundwater Directives to update the lists of pollutants and quality standards therein. This work aims to better protect our citizens and our water bodies against hazardous chemicals. This new body of work has been added to the RBMP.

Section 5.4.14 – Aquaculture

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

Summary of consultation response:

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

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

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

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

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

How is this being addressed in the plan?:

Please note that the following text has been added to the plan: DHLGH and DAFM will work collaboratively to consider the current aquaculture licensing guidelines and process in order to ensure that the WFD assessment process is provided for. Following examination, both departments, together with the support of the Marine Institute, will work collectively to update the process/guidelines, if required.

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

Summary of consultation response:

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

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

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

How is this being addressed in the plan?:

The following text has been added to the plan to address this issue:

DHLGH and DAFM will work collaboratively to consider the current aquaculture licensing guidelines and process in order to ensure that the WFD assessment process is provided for. Following examination, both departments, together with the support of the Marine Institute, will work collectively to update the process/guidelines, if required.

In addition, The following text is included in the plan to deal with Shellfish Waters:

For the purposes of improving the protection of shellfish waters, DHLGH will seek to implement a new legislative and management framework for shellfish waters in Ireland. This will include consideration of monitoring, assessment and protection measures. It is envisaged that this will take place in the context of the new regional river basin planning structures proposed for the next cycle. DHLGH will consultant with relevant stakeholders throughout this process.

Section 5.4.15 - Land Use Planning

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

Summary of consultation response:

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

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

Recommendations within Submissions:

1) A WFD-specific assessment in advance of developments potentially impacting waterbodies e.g., dredging; drainage; flood protection. Projects can only go ahead if it can be demonstrated that WFD objectives will not be compromised.

2) A prohibition on wetland drainage and commitment to a national wetland restoration programme.

3) A review of the impacts of arterial drainage; and a commitment to review and

4) Amend the Arterial Drainage Act 1945 to remove the requirement to maintain drainage and to bring it into compliance with EU environmental law.

5) Full integration of water management in the upcoming Land Use Plan committed to by government, so that catchment- and nature-based approaches are central to it.

How is this being addressed in the plan?:

1. WFD specific assessment has been drafted. Further consultation on these guidelines has been deferred pending the enactment of the Planning and Development Bill 2022 revising and updating the Planning and Development Acts to ensure that the draft guidance reflects the most up-to-date legal position. The Bill is currently subject to pre-legislative scrutiny in Dail Éireann.

2. Currently, there is no plan currently for a national prohibition of wetland drainage. However, the National Peatlands Strategy aims to provide a long-term framework within which all peatlands within the State can be managed responsibly. In addition, with the goal of rehabilitating 33,000 hectares of peatlands, Bord na Mona's Enhanced Decommissioning Rehabilitation and Restoration Scheme (EDRRS) is one of the largest of its kind in Europe.

3. A review of the Arterial Drainage Act 1945 will be undertaken as part of the proposed new National Hydromorphology Programme, which will be overseen by the Hydromorphology Expert Group.

4. Amendment of the Arterial Drainage Act 1945 can only occur following review (point 3).

5. Nature-based solutions are encouraged (in the absence of legislative requirement for their use) in the draft WFD Planning Guidance.

Section 5.5 – Update and Review of the Economic Analysis

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

Summary of consultation response:

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

Recommendations within Submissions:

1) To put in place a funding stream to upgrade and take in charge towns and villages without wastewater networks.

2) Finalise the review of rural water services and produce a rural water services strategic plan including a national rural water resources plan for the rural water sector.

How is this being addressed in the plan?:

1. Programme of Measures contains action in relation to maintaining a funding stream to upgrade and take in charge towns and villages without wastewater networks to improve the wastewater needs of rural villages that are outside of the current Uisce Éireann collection network.

2. Programme of Measures contains action in relation to finalising the review of rural water services and producing a rural water services strategic plan, including a national rural water resources plan for the rural water sector

2. Template response (original emanating from the Sustainable Water Network (SWAN)

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

How is this being addressed in the plan?:

The Water Action Plan includes targeted measures for all waterbodies, with the objective of either protecting water bodies at good or high status or restoring water bodies to at least good status. Where further specific measures are needed to those set in this plan, integrated catchment planning approaches will be used to identify and decide on specific measures for each water body. This will be reported in 46 local catchment action and management plans. These catchment management plans will be used to micro-locate measures within each catchment. The list of waterbodies and their associated status, significant pressures/issues and targeted measures, which are to be included in the catchment management plans, will include targets for the third cycle, along with Key Performance Indicators to monitor progress and outcomes.

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

How is this being addressed in the plan?:

Instead of permitting system a stronger focus is being taken to inspection and enforcement. The Programme of Measures in the RBMP contain the following actions:

- The local authority inspection and enforcement process under the Nitrates Action Programme has been increased and more strongly focused to target farms in waterbodies most at risk of impacting water quality. These inspections will include some derogation farms.
- Department of Agricultural Food and the Marine are inspecting 10% (increase from 5%) of derogation farms per annum with a stronger focus also on targeting waterbody that pose the greatest risk to water quality.
- The Nitrates Action Programme Interim Review will be assessing the water quality changes between 2020-2022. In waterbodies where there is a decline in water quality or where a water body is not meeting its environmental objective the European Commission has

stipulated that the Nitrates derogation limit of 250 kg N/ha will be reduced to 220 kg N/ha from 2024.

Prohibit wetland drainage and implement a national wetland restoration plan.

How is this being addressed in the plan?:

Currently, there is no plan currently for a national prohibition of wetland drainage. However, the National Peatlands Strategy aims to provide a long-term framework within which all peatlands within the State can be managed responsibly. In addition, with the goal of rehabilitating 33,000 hectares of peatlands, Bord na Mona's Enhanced Decommissioning Rehabilitation and Restoration Scheme (EDRRS) is one of the largest of its kind in Europe.

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

How is this being addressed in the plan?:

New Action in the RBMP Programme of Measures to review the 208 water bodies where Urban Wastewater has been identified as a significant pressure.

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

How is this being addressed in the plan?:

Under the 2014 Forestry Act and enacting legislation, the Minister for Agriculture, Food and the Marine is required to promote and monitor the protection and enhancement of water quality when assessing applications for forestry activities. In doing so, DAFM must ensure that forestry operations and forest-based activities regulated under the Act are compatible with the requirements of the Water Framework Directive.

For the purposes of supporting the third River Basin Management Plan the DAFM *Forests & Water* document will be reviewed and updated as the Forestry Sector plan supporting the 46 Local Catchment Management Plans.

The updated Forests & Water document will include;

- An assessment of the changes in water bodies identified as being at risk from forestry during the 2nd cycle
- Tabulated actions proposed for the 233 waterbodies at risk from Forestry, outlining what forestry activities are likely to be the cause of the significant pressure and the measures to address these.

- As part of the distance to target analysis process led by the EPA, the impact of sectoral plans, including that for Forestry, will be assessed as part of the preparation of the 46 Local Catchment Plans.

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

How is this being addressed in the plan?:

A new '*Coastal Issues'* chapter has been added to the RBMP.

In addition to the RBMP, these issues are addressed further in the following ways:

DAFM have provided an update to Part 3 of Ireland's Marine Strategy: Programme of Measures (Article 13), under the Marine Strategy Framework Directive (MSFD). The Marine Strategy Framework Directive (MSFD) aims to achieve Good Environment Status (GES) for all marine waters in Europe, and to protect the resource base for marine related economic and social activities. Irelands Marine Strategy Part 1 (2020) identified the status of Ireland's marine environment and the gaps to achieving GES. To close these gaps Ireland has revised its Marine Strategy Part 3: Programme of Measures (PoMs); first developed in 2015.

The Maritime Area Regulatory Authority, or MARA, is a new state agency that will be established in early 2023. MARA's functions are set out in the Maritime Area Planning Acts 2021 and 2022, and it will have a key role to play in the new streamlined consenting system for the maritime area, including:

- Assessing Maritime Area Consent (MAC) applications for the maritime area, which are required by developers before development permission can be granted;
- Granting marine licencing for specified activities;
- Compliance and enforcement of MACs, licences and offshore development consents;
- Investigations and prosecutions;
- Administration of the existing Foreshore consent portfolio;
- Fostering & promoting co-operation between regulators of the maritime area.

MARA will be a body under the aegis of the Department of Housing, Local Government and Heritage and will be located in Wexford.

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

How is this being addressed in the plan?:

The Programme Delivery Office will support the implementation of the Plan across Departments, Local Authorities, EPA and other key agencies and stakeholders, and will provide clarity and direction to the various implementation bodies and coordinate the implementation of actions contained in Programme of Measures where each action will be assigned a lead body responsible for their implementation and an agreed date of delivery. The Project Delivery Office will also coordinate publication of progress reports, to ensure effective implementation of these actions, which will clearly and comprehensively set out performance against targets, to allow for increased stakeholder engagement. The publication of these reports will be managed through a dedicated Campaign Site and will also be used to facilitate communications and stakeholder engagement on issues regarding the RBMP and water quality. Public

participation will be included in the development of the 46 Catchment Management Plans through the establishment of Catchment Community Fora.

3. Individual 'Free Style' Submissions

3.1 Government Department/Agency/Body

3.1.1 Catchment Management Plans

Theme raised:

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

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

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

How is this being addressed in the plan?:

LAWPRO will prepare a template for the catchment management plans by early 2024. LAWPRO is trialling a template in five catchments, one in each of the five LAWPRO regions (Border, Midlands & East, South East, South West and West). The pilot process will help develop the catchment management plan framework and will also include developing the data capture requirements. This will ultimately inform the template for the Catchment Management Plans.

3.1.2 Measures to Improve Water Quality

Theme raised:

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

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

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

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

How is this being addressed in the plan?:

A working group was established jointly by the CCMA and DHLGH to oversee the development of a project scope to deliver an implementation strategy for nature based Sustainable Urban Drainage Systems on a national scale. This strategy will support the City and County Development plans in the implementation of nature based solutions to surface water management through water sensitive urban designs. In advance of a national implementation strategy for nature based SUDS being delivered during the third cycle of the RBMP, interim guidance will be provided to the Local and Planning Authorities on measures to be implemented to support the delivery of a greater focus on nature based solutions within the constraints of the current legislation and policy**.**

The EPA have identified Integrated Pollution Control (IPC), Industrial Emissions (IE) and waste licenced facilities that are considered a significant pressure on water quality under the WFD, and have prioritised them for enforcement. A site specific enforcement plan has been drawn up for each of the sites and the EPA are carrying out detailed investigations to identify what impact a site may be having on water quality. The EPA will continue to track the progress and implementation of the site specific enforcement plans throughout the 3rd cycle of the RBMP.

The Programme of Measures identifies the individual actions listed under each of the specific pressures on water quality. Each measure is assigned to a lead organisation, with a delivery timeframe, which will report on its progress to the Project Delivery Office. The Programme of Measures is being supported by the implementation of catchment management plans by LAWPRO for each of the 46 catchments.

Of the approximately 73,000 barriers identified nationally by IFI, 2,000-7,000 will likely require mitigation. The third cycle RBMP aims to mitigate approximately 5% (270) of the 2,000-7,000 problem barriers. However, the exact number will be determined after more detailed local investigations. Restoration targets for water-dependent habitats and species listed in the Nature Directives, which have been adversely affected by hydromorphological pressures, will also need to be considered as part of any restoration programme. This work will be undertaken as part of the proposed new National Hydromorphology Programme.

3.1.3 Areas of Action

Theme raised:

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

How is this being addressed in the plan?:

In terms of the programme of measures for the third-cycle plan, there is a need to consider the possible effects of climate change when selecting and implementing measures. These measures will need to be resilient to climate change impacts, especially expensive and long-term investments such as large infrastructure projects. The river basin manangement plan seeks to promote nature based

solutions whereever possible, both in the rural and urban setting. As a result, a climate change sensitivity analysis or "climate check" will be undertaken for all measures carried out under this plan to test their ability to perform under future climate conditions. This analysis will be undertaken at the level of the local catchment action and management plans and sectoral plans where the details of measures will become clearer. This is to ensure that the actions selected are effective, sustainable and cost efficient under changing conditions.

3.1.4 Public Awareness

Theme raised:

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

How is this being addressed in the plan?:

Building on work already undertaken by the EPA, LAWPRO and various other bodies, DHLGH will provide further supports for the development of a National Water focused Citizen Science Strategy for the monitoring of water quality. This will involve the rollout of the national macroinvertebrate citizen science process developed in the 2nd cycle and development and production of training and citizen science support materials, both of which will be led by LAWPRO. A commitment in the Programme for Government, the Community Water Development Fund, which is managed by LAWPRO will be expanded. The Fund will be further developed and expanded during the 3rd cycle in recognition of the benefit of increased participation of the public in helping to implement the RBMP.

3.1.5 High Status Waterbodies

Theme raised:

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

How is this being addressed in the plan?:

In the 3rd Cycle, there will be a strong emphasis on and a specific section dedicated to blue dots programme in each of the 46 catchment management plans which will be developed. Pilot community fora will be established to inform the development of local initiatives specifically for blue dot waters. Restoration and protection measures will be advanced in all areas for action containing blue dot catchments. There will be a strong emphasis on engagement and awareness raising, focusing firstly on the key sectoral stakeholders who have the most impact on blue dots and on communities within blue dot catchments.

3.1.6 Habitat Protection

Theme raised:

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

How is this being addressed in the plan?:

The Habitats Directive has clear links to the Water Framework Directive through the Register of Protected Areas, which includes Special Areas of Conservation (SAC) designated under the Habitats Directive, and Special Protection Areas (SPAs) designated under the Conservation of Wild Birds Directive (Directive 79/409/EEC as codified by Directive 2009/147/EC), collectively referred to as 'European Sites'. Article 6(3) establishes the requirement for an AA of plans and projects likely to affect such European Sites. In compiling the draft plan, the DHLGH has screened the plan for AA and has concluded that full AA is required. As such a Natura Impact Statement (NIS) has been prepared to further inform the development of the draft Plan. The content of the NIS and submissions made in relation to the draft plan and any other relevant information will be considered prior to a final determination in relation to the AA. Both the SEA and AA processes have been carried out in parallel with the drafting of the plan and will continue to inform the plan prior to its finalisation and adoption.

3.1.7 Drinking Water Protection

Theme raised:

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

How is this being addressed in the plan?:

The recast Drinking Water Directive and subsequent national Regulations includes the use of a Watch List for substances of concern to be monitored in drinking water sources.

3.1.8 Wastewater Management

Theme raised:

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

How is this being addressed in the plan?

Uisce Éireann have a programme to install event duration monitors on selected storm water overflows.

New Action in RBMP for Local Authorities to engage with householders to improve general awareness of septic maintenance requirements and to address any failing septic tanks.

3.1.9 Hazardous Substances

Theme raised:

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

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

How is this being addressed in the plan?:

The EU Commission have published a proposal for a Directive of the European Parliament and of the Council to amend Directive 2000/60/EC establishing a framework for Community action in the field of water policy, Directive 2006/118/EC on the protection of groundwater against pollution and deterioration and Directive 2008/105/EC on environmental quality standards in the field of water policy.

The objective of the Directive is to protect human health and the environment from the combined effects of toxic and/or persistent pollutants. Lists of pollutants and relevant quality standards, which are required to be reviewed regularly, are included in the legislation. A revision of the Directives was completed in 2019, which concluded that (i) the lists of pollutants and quality standards required an update and (ii) the coherence, efficiency and effectiveness of the legislation could be improved.

Ireland will work with the European Commission on their proposal to amend the Water Framework Directive and the Surface and Groundwater Directives to update the lists of pollutants and quality standards therein. This work aims to better protect our citizens and our water bodies against hazardous chemicals. This new body of work has been added to the RBMP.

3.1.10 Forestry

Theme raised:

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

The action in relation to addressing forestry related incidents should be strengthened in the final Plan to focus on prevention of incidents though closer supervision and oversight of operations particularly in highly sensitive areas by DAFM. The RBMP must tackle water quality issues linked to forestry "legacy

sites" which are unsuitable for afforestation in the Land Types for Afforestation Working Document 2016, incl. most commercial forestry established prior to 'Forest Service Guidelines'.

How is this being addressed in the plan?:

Under the 2014 Forestry Act and enacting legislation, the Minister for Agriculture, Food and the Marine is required to promote and monitor the protection and enhancement of water quality when assessing applications for forestry activities. In doing so, DAFM must ensure that forestry operations and forest-based activities regulated under the Act are compatible with the requirements of the Water Framework Directive.

For the purposes of supporting the third River Basin Management Plan the DAFM *Forests & Water* document will be reviewed and updated as the Forestry Sector plan supporting the 46 Local Catchment Management Plans.

The updated Forests & Water document will include;

- An assessment of the changes in water bodies identified as being at risk from forestry during the 2nd cycle.
- Tabulated actions proposed for the 233 waterbodies at risk from Forestry, outlining what forestry activities are likely to be the cause of the significant pressure and the measures to address these.
- As part of the distance to target analysis process led by the EPA, the impact of sectoral plans, including that for Forestry, will be assessed as part of the preparation of the 46 Local Catchment Plans.

3.1.11 Peat

Theme raised

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

How is this being addressed in the plan?:

The National Peatlands Strategy aims to provide a long-term framework within which all peatlands within the State can be managed responsibly. In addition, with the goal of rehabilitating 33,000 hectares of peatlands, Bord na Mona's Enhanced Decommissioning Rehabilitation and Restoration Scheme (EDRRS) is one of the largest of its kind in Europe.

3.1.12 Land use Planning

Theme raised:

The final plan should highlight the need to link to the work done on land use review. The guidelines for the incorporation of the Water Framework Directive (WFD) into the planning system should be finalised and rolled out as soon as possible. Extensive training and awareness for planners and developers will be

required to ensure it is fully implemented. The impact of developments on water quality should be integrated into all regulatory planning and development frameworks, for example, for forestry, aquaculture, foreshore and marine planning.

How is this being addressed in the plan?:

WFD specific assessment has been drafted. Further consultation on these guidelines has been deferred pending the enactment of the Planning and Development Bill 2022 revising and updating the Planning and Development Acts to ensure that the draft guidance reflects the most up-to-date legal position. The Bill is currently subject to pre-legislative scrutiny in Dail Éireann.

Training will be provided as part of the rollout of this guidance.

3.1.13 Aquaculture and Fisheries

Theme raised:

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

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

How is this being addressed in the plan?:

The following text has been added to the plan to address this issue:

DHLGH and DAFM will work collaboratively to consider the current aquaculture licensing guidelines and process in order to ensure that the WFD assessment process is provided for. Following examination, both departments, together with the support of the Marine Institute, will work collectively to update the process/guidelines, if required.

3.1.14 Nutrient Sensitive Areas

Theme raised:

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

How is this being addressed in the plan?:

The EPA recently carried out a review of nutrient sensitive areas downstream of large urban waste water discharges, with 76 waste water discharges identified for assessment. On completion, a total of 66 areas downstream of 51 of these discharges were identified as nutrient sensitive. This is an increase from the previous assessment in 2016, which identified 64 nutrient sensitive areas downstream of 48 discharges. Once a nutrient sensitive area is identified, additional nutrient removal must be applied (if not already applied) to waste water treatment plants discharging to the sensitive area. Forty five of the 51 discharges have nutrient removal in place.

See Section '*Nutrient Sensitive Areas'* in the text of the plan for further information.

3.1.15 Invasive Species

Theme raised

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

How is this being addressed in the plan?:

The 3rd RBMP will continue to drive the implementation of the measures contained in the 2nd RBMP. In particular, this includes the finalisation of legislation for the implementation of the EU IAS Regulation and the delivery of draft management plans.

Work is also underway on drafting a National Management Plan for Invasive Alien Species to deliver on the commitment made in the Programme for Government. This will require the convening of a Steering Group to finalise the draft management plan, and public consultation and stakeholder engagement to inform the management plan prior to publication.

3.1.16 Flooding

Theme raised:

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

How is this being addressed in the plan?:

Among the actions identified in the second cycle River Basin Management Plan (RBMP) was the delivery of guidelines for planning authorities on the relationship between physical planning and river basin management planning. A public consultation on the draft planning guidelines will be undertaken to provide stakeholders with the opportunity to comment prior to finalisation.

These guidelines will provide planning authorities with clear direction on how to consider the risk that proposed plans or developments, will pose to achieving the objectives of the Water Framework

Directive. They will set out how strategic level forward planning and development planning can prevent future development from inadvertently causing deterioration in water quality or impacting the physical condition of water bodies, while also supporting the delivery of improvements to our water environment, as required by the Water Framework Directive.

3.1.17 Cultural Heritage

Theme raised:

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

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

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

How is this being addressed in the plan?:

Ireland has abundant natural water resources in rivers, lakes and groundwater. These water resources have an inherent and indisputable value themselves, but also provide very significant ecosystem services to the nation. The 3rd River Basin Management Plan outlines the measures the Government and other sectors are taking to improve water quality in Ireland's groundwater, rivers, lakes, estuarine and coastal waters, and provide sustainable management of our water resources. This is specifically highlighted in the Plan's Mission Statement: "Take action to protect and improve all of Ireland's waterbodies by implementing the right measure in the right place, at the right time."

3.1.18 SEA Related Comments

Theme raised:

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

How is this being addressed in the plan?:

In compiling the draft plan, the DHLGH had screened the plan for AA and had concluded that a full AA is required. As such a Natura Impact Statement (NIS) has been prepared to further inform the development of the draft Plan. The content of the NIS and submissions made in relation to the draft plan and any other relevant information will be considered prior to a final determination in relation to the AA.

Both the SEA and AA processes have been carried out in parallel with the drafting of the plan and will continue to inform the plan prior to its finalisation and adoption. It should be kept in mind that the RBMP does not replace or negate the need for other regulatory requirements particular to specific proposal types and scales, public bodies, decision-making processes or locations. Such requirements may apply at any stage of a proposal from investigative and feasibility studies to operation. There is an important role for optioneering at all phases of planning and development to avoid environmental impacts. Requirements include relevant environmental assessments such as, inter alia, Strategic Environmental Assessment (SEA), Environmental Impact Assessment (EIA) and Appropriate Assessment (AA), as appropriate.

Notwithstanding the SEA/AA process that has been applied to this plan, all measures and projects arising during the third-cycle RBMP will be subject to further environmental assessments at the appropriate level, as required. In completing any required assessment, the responsible agency and/or project partners should ensure the utilisation of the appropriate tools available, such as the EPA's Environmental Sustainability Tool.

The Programme Delivery Office will support the implementation of the Plan across Departments, Local Authorities, EPA and other key agencies and stakeholders, and will provide clarity and direction to the various implementation bodies and coordinate the implementation of actions contained in Programme of Measures where each action will be assigned a lead body responsible for their implementation and an agreed date of delivery. The Project Delivery Office will also coordinate publication of progress reports, to ensure effective implementation of these actions, which will clearly and comprehensively set out performance against targets, to allow for increased stakeholder engagement. The publication of these reports will be managed through a dedicated Campaign Site and will also be used to facilitate communications and stakeholder engagement on issues regarding the RBMP and water quality.

The Department of Housing, Local Government and Heritage will review progress with the implementation of the Programme of Measures with the assistance of the WFD Implementation Structures. Reviews of the Local catchment action and management plans and supporting Sectoral

Plans, will be undertaken on an annual basis. Progress will be tracked, lessons learned and measures adapted with the aim of accelerating the rate of progress, as quickly as possible. Progress results will be published.

3.2 Local Authority

3.2.1 Catchment Management Plans

Theme raised:

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

How is this being addressed in the plan?:

LAWPRO will prepare a template for the catchment management plans by early 2024. LAWPRO is trialling a template in five catchments, one in each of the five LAWPRO regions (Border, Midlands & East, South East, South West and West). The pilot process will help develop the catchment management plan framework and will also include developing the data capture requirements. This will ultimately inform the template for the Catchment Management Plans.

3.2.2 Water Governance

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

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

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

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

How is this being addressed in the plan?:

Meeting the challenge of protecting and improving Ireland's water quality will continue to be a complex undertaking. There is also a significant challenge in cross-sectoral coordination. Close coordination is need to identify and exploit any potential opportunity and co-benefits for mitigating and adapting to climate change as well as for biodiversity protection. In this cycle there will be an emphasis on collective efforts and space given to collaborative activities to encourage collaboration

and coordination through the governance structures. Ireland's water policy regulations (European Communities (Water Policy) Regulations 2003, as amended) requires every public authority to exercise its functions in a manner which is consistent with the provisions of the Water Framework Directive and to secure compliance with the Directive and with the provisions of any river basin management plan. The water objectives of this plan will be integrated into future policy statements. This includes for example climate adaptation plans, marine spatial planning, flood risk management plans, biodiversity plans, agricultural policy, and into spatial plans. One of the aims of this policy integration is to ensure that the opportunities for multiple benefits are identified and assessed across inter-related policy areas (See Section '*Other Plans and Programmes'* of the text for further details).

See Appendix on '*Membership lists for RBMP Implementation Bodies*' for further information

See Section '*Areas for Action'* in the text of the plan for further information.

3.2.3 Legislative Changes

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

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

How is this being addressed in the plan?:

WFD specific assessment has been drafted. Further consultation on these guidelines has been deferred pending the enactment of the Planning and Development Bill 2022 revising and updating the Planning and Development Acts to ensure that the draft guidance reflects the most up-to-date legal position. The Bill is currently subject to pre-legislative scrutiny in Dail Éireann.

A review of the Arterial Drainage Act 1945 will be undertaken as part of the proposed new National Hydromorphology Programme, which will be overseen by the Hydromorphology Expert Group.

See Section '*Artificial and Heavily Modified Waterbodies'* in the text of the plan for further information in relation to this matter.

3.2.4 Hydro-morphology

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

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

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

How is this being addressed in the plan?:

A programme is proposed to develop a new Controlled Activities for the Protection of Waters regime. The new management regime will deliver multiple benefits for water, nature and biodiversity, and climate mitigation and adaptation. The existing body of legislation in the water services and water management sector, governing activities impacting on the physical condition of water, cannot be easily amended to deliver a robust regulatory regime. The existing body of legislation is too disparate, it is complicated, and has already been heavily amended, such that it requires considerable cross-referencing and skill to navigate. Therefore, it will be necessary to develop new legislation, including the development of a Bill and associated secondary legislation aimed at managing hydromorphological pressures. This will also require a number of repeals or /amendments to existing pieces of legislation across a number of policy areas.

An interdepartmental legislative steering group or 'Hydromorphology Expert Group', supported by a number of technically expert agencies, has been established to ensure that a coherent and coordinated legislative programme is delivered effectively and in good time.

Of the approximately 73,000 barriers identified nationally by IFI, 2,000-7,000 will likely require mitigation. The third cycle RBMP aims to mitigate approximately 5% (270) of the 2,000-7,000 problem barriers. However, the exact number will be determined after more detailed local investigations. Restoration targets for water-dependent habitats and species listed in the Nature Directives, which have been adversely affected by hydromorphological pressures, will also need to be considered as part of any restoration programme. This work will be undertaken as part of the proposed new National Hydromorphology Programme.

3.2.5 Funding/Awareness/Public Engagement

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

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

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

How is this being addressed in the plan?:

Building on work already undertaken by the EPA, LAWPRO and various other bodies, DHLGH will provide further supports for the development of a National Water focused Citizen Science Strategy for the monitoring of water quality. This will involve the rollout of the national macroinvertebrate citizen science process developed in the 2nd cycle and development and production of training and citizen science support materials, both of which will be led by LAWPRO. A commitment in the Programme for Government, the Community Water Development Fund, which is managed by LAWPRO will be expanded. The Fund will be further developed and expanded during the 3rd cycle in recognition of the benefit of increased participation of the public in helping to implement the RBMP.

In the 3rd Cycle, there will be a strong emphasis on and a specific section dedicated to blue dots programme in each of the 46 catchment management plans which will be developed. Pilot community

fora will be established to inform the development of local initiatives specifically for blue dot waters. Restoration and protection measures will be advanced in all areas for action containing blue dot catchments. There will be a strong emphasis on engagement and awareness raising, focusing firstly on the key sectoral stakeholders who have the most impact on blue dots and on communities within blue dot catchments.

3.2.6 Resources and Training

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

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

How is this being addressed in the plan?:

Action in the Programme of Measures for the RBMP that **training will be provided for local authority staff and others undertaking inspections under the GAP Regulations including DAFM and Inland Fisheries Ireland personnel undertaking inspections. Additional action in the Programme of Measures for specific capacity building programmes of work to be put in place to encourage transfer of learning and knowledge. This will result in a competency framework of training courses for Local Authority environment section staff.**

3.2.7 Monitoring, Management, Enforcement

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

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

How is this being addressed in the plan?:

The Water Framework Directive application – the WFD App – has been developed by the EPA to facilitate the sharing and reporting of environmental data collection by the organisations involved in the national monitoring programme. For this cycle, the application will be enhanced to allow the tracking of implementation, including both protection and improvement actions, as this is central to the CMP framework. Any actions undertaken by communities will also be recorded where these are reported to local authorities. This data system will centralise all relevant information from implementation bodies on the measures planned, underway and complete.

The EPA will provide access to an annual reporting on progress by each implementation against the Key Performance Indicators and targets in the programme of measures in the third-cycle River Basin Management Plan. Regional Committees and the NCMC will evaluate implementation performance on an ongoing basis. The EPA will continue to report on water quality and water quality trends.

The RBMP includes actions in the Programme of Measures which highlight Uisce Éireann's continued investment in urban wastewater infrastructure between 2020 and 2027. A new action has been included in the Programme of Measures which reviews the 208 water bodies where urban wastewater has been identified as a significant pressure.

Nature-based solutions are encouraged (in the absence of legislative requirement for their use) in the draft WFD Planning Guidance.

3.2.8 Compliance Assurance

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

How is this being addressed in the plan?:

Action in the Programme of Measures for the RBMP that a data management system will be developed to capture and track the local authority National Agricultural Inspections Programme. This system will be integrated with other WFD data systems. There will therefore be transparency on GAP non-compliances and LAWPRO will have access to this information. Further action in relation to Forestry included where DAFM will continue to seek improvements to the licence applications process for key forestry activities.

A key measure under the Plan is a new collaborative Agricultural Sustainability Support and Advisory Programme (ASSAP) between the State and the dairy industry, consisting of 30 Sustainability Advisers promoting best agricultural and environmental practices in the 190 'areas for action'.

3.2.9 Aquaculture

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

How is this being addressed in the plan?:

The following text is included in the plan to deal with Shellfish Waters:

For the purposes of improving the protection of shellfish waters, DHLGH will seek to implement a new legislative and management framework for shellfish waters in Ireland. This will include consideration of monitoring, assessment and protection measures. It is envisaged that this will take place in the context of the new regional river basin planning structures proposed for the next cycle. It is expected that this process will be undertaken in the following four steps:

- A review of the quality standards that shellfish waters must meet to ensure adequate protection of the habitat for shellfish.
- The drafting of primary legislation to allow for the designation and protection of shellfish waters by the DHLGH.
- Development of associated regulations by the DHLGH to allow for the identification of shellfish waters and monitoring requirements. This legislation will also allow shellfish waters to be considered as protected areas under the WFD. This work will include the identification of new shellfish areas that require designation.
- Consideration of protected shellfish waters in the WFD characterisation process and the development of measures through the river basin planning structures to protect and restore these waters to ensure they meet the requirements of the quality standards set out in the legislation developed.

3.2.10 Water Quality

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

How is this being addressed in the plan?:

The plan contains a measure around the extension of Domestic Waste Water Treatment Systems grant scheme to assist with costs of domestic waste water treatment system / septic tank remediation in high status water areas and in Priority Areas for Action where defective systems are posing a risk to waters.

The discharges from UWWTP are licenced or certified by the EPA.

During the 3rd RBMP cycle Uisce Éireann will continue its investment in storm water overflows, through improvements and upgrades. Storm water overflows are designed to, screen the first flush from the sewer system retaining it for treatment and prevent overloading of wastewater treatment plants during periods of high surface water inflow to combined sewers caused by high rainfall. A specific list of the particular Storm water overflow due for upgrade in this cycle are included in the plan's Appendices.

The National Pesticides and Drinking Water Action Group (NPDWAG) is chaired by DAFM and includes representatives from the EPA, Irish Water, local authorities, the farming community and pesticide manufacturers and suppliers. This group works together to raise awareness of the need to use pesticides responsibly. Transposition of the new Drinking Water Directive provides the opportunity to learn from and build on the successful collaborative work of the Action Group in protecting sources of drinking water being contaminated by hazardous substances more generally.

The plan contains a measure concerning the National Bathing Water Expert Group to undertake a research project to determine the most suitable approach to protecting bathers' health outside of the current bathing season.

5.3 Non-Governmental Organisations

5.3.1 Ambition

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

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

How is this being addressed in the pan?

The Programme Delivery Office will support the implementation of the Plan across Departments, Local Authorities, EPA and other key agencies and stakeholders, and will provide clarity and direction to the various implementation bodies and coordinate the implementation of actions contained in Programme of Measures where each action will be assigned a lead body responsible for their implementation and an agreed date of delivery. The Project Delivery Office will also coordinate publication of progress reports, to ensure effective implementation of these actions, which will clearly and comprehensively set out performance against targets, to allow for increased stakeholder engagement. The publication of these reports will be managed through a dedicated Campaign Site and will also be used to facilitate communications and stakeholder engagement on issues regarding the RBMP and water quality.

5.3.2 Agricultural Issues

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

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

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

How is this being addressed in the plan?:

With regards to greater correlation with CAP, the following text has been included in the plan:

The Common Agricultural Policy Strategic Plan Regulations 2115/2021 will take effect from the 1st January 2023 until 2027. This is the EU instrument that sets the rules for Member State Common Agricultural Policy strategic plans (CAP Strategic Plans), which are financed in part by the European Agricultural Guarantee Fund (EAGF) and by the European Agricultural Fund for Rural Development (EAFRD). This sets the standard for good agricultural and environmental condition of land (known as GAEC).

Ireland's CAP Strategic Plan (CSP), which came into effect in January 2023, has a strong emphasis on the achievement of a higher level of climate and environmental ambition and contains measures that aim to improve biodiversity and water quality. More specifically, it outlines how it contributes to CAP objectives at EU level and additional environmental objectives under the Water Framework Directive, as set out in national policies, including the national River Basin Management Plan.

The objectives of the new CAP include climate, animal welfare, water, soil, animal and plant health and biodiversity. These will be delivered through the new Green Architecture. The components will consist of; Enhanced Conditionality, annual Eco-schemes and multi-annual Agri-Environment Climate Measures, which will be delivered through the new Agri-Climate Rural Environment Scheme (ACRES). ACRES aims to contribute significantly to achieving improved biodiversity, climate, air and water quality outcomes. These will be achieved through two approaches under the scheme:

- an ACRES General approach, offering a range of measures for individual farmers (both targeted and general); and
- an ACRES Co-operation approach, available to farmers in defined high priority geographical areas, who opt to undertake measures, as well as bespoke farm and landscape actions.

It should also be noted that DHLGH continue to work collaboratively with DAFM to bring greater alignment with the WFD objectives and focus on the delivery for water quality.

In relation to the Nitrates Derogation, there is a stronger risk based focus being taken to inspection, issuing penalties and enforcement of derogation farms and the plan includes the following actions in the Programme of Measures:

- The local authority inspection and enforcement process under the Nitrates Action Programme has been increased and more strongly focused to target farms in waterbodies most at risk of impacting water quality. These inspections will include some derogation farms.

- Department of Agricultural Food and the Marine are inspecting 10% (increase from 5%) of derogation farms per annum with a stronger focus also on targeting waterbody that pose the greatest risk to water quality.
- The Nitrates Action Programme Interim Review will be assessing the water quality changes between 2020-2022. In waterbodies where there is a decline in water quality or where a water body is not meeting its environmental objective the European Commission has stipulated that the Nitrates derogation limit of 250 kg N/ha will be reduced to 220 kg N/ha from 2024.

5.3.3 Wetland Drainage

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

How is this being addressed in the plan?:

Currently, there is no plan for a national prohibition of wetland drainage. However, the National Peatlands Strategy aims to provide a long-term framework within which all peatlands within the State can be managed responsibly. In addition, with the goal of rehabilitating 33,000 hectares of peatlands, Bord na Mona's Enhanced Decommissioning Rehabilitation and Restoration Scheme (EDRRS) is one of the largest of its kind in Europe.

5.3.4 Waste Water Treatment

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

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

How is this being addressed in the plan?:

Urban Wastewater treatment standards are dictated by receiving water carrying capacity as required in licences or certificates.

The National Inspection Plan (NIP) for domestic wastewater has been reviewed and there is an increase in the number of inspections carried out each year. There is an Action in the plan for Local Authorities (LA) to enforce advisory notices issued under the NIP and the Department to issue policy direction to LA regarding advisory notices.

5.3.5 Forestry

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

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

How is this being addressed in the plan?:

Under the 2014 Forestry Act and enacting legislation, the Minister for Agriculture, Food and the Marine is required to promote and monitor the protection and enhancement of water quality when assessing applications for forestry activities. In doing so, DAFM must ensure that forestry operations and forest-based activities regulated under the Act are compatible with the requirements of the Water Framework Directive.

For the purposes of supporting the third River Basin Management Plan the DAFM *Forests & Water* document will be reviewed and updated as the Forestry Sector plan supporting the 46 Local Catchment Management Plans.

The updated Forests & Water document will include;

- An assessment of the changes in water bodies identified as being at risk from forestry during the 2nd cycle
- Tabulated actions proposed for the 233 waterbodies at risk from Forestry, outlining what forestry activities are likely to be the cause of the significant pressure and the measures to address these.
- As part of the distance to target analysis process led by the EPA, the impact of sectoral plans, including that for Forestry, will be assessed as part of the preparation of the 46 Local Catchment Plans.

5.3.6 Water Quality

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

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

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

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

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

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

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

How is this being addressed in the plan?:

The Programme of Measures identifies the individual actions listed under each of the specific pressures on water quality. Each measure is assigned to a lead organisation, with a delivery timeframe, which will report on its progress to the Project Delivery Office. The Programme of Measures is being supported by the implementation of catchment management plans by LAWPRO for each of the 46 catchments.

The External Expert Assessment of the Agricultural Sustainability Support and Advisory Programme (ASSAP) was completed in Q4 2021. The review concluded that "ASSAP has a key role in improving water quality in Irish agriculture. The variety of farm conditions and the complexity of water movement means that 'one size fits all' policies, with general recommendations and rules, may struggle to be effective. The need for contextualised action is captured in the principle: the 'right action in the right place'. This requires engagement with farmers and others. This is part of an emerging system of experimental governance in the management of water and agriculture. ASSAP should be further developed under the 3rd RBMP, expanding as additional Areas for Action are selected, with appropriate scientific support."

WFD specific assessment has been drafted. Further consultation on these guidelines has been deferred pending the enactment of the Planning and Development Bill 2022 revising and updating the Planning and Development Acts to ensure that the draft guidance reflects the most up-to-date legal position. The Bill is currently subject to pre-legislative scrutiny in Dail Éireann.

To support the goal of targeting the right measure in the right place all farm advisers involved in Environmental Schemes including the Cooperation Projects and Water EIP, will be provided with the appropriate level of catchment science training to ensure that measures are sufficiently targeted. In addition, these farm advisers will be made aware of the various other relevant funding schemes available to farmers to support the right measure in the right place.

For the 1229 waterbodies that are currently in Review, these waterbodies require further assessment. There are two components to this category in terms of action and measures as follows:

- In approximately 21% of waterbodies in Review, measures are in place but the water quality improvement has not yet been realised, or there has been some slight indication of improvement but not enough yet to categorise them as Not at Risk. Therefore, these waterbodies require further monitoring and assessment and this action is already accounted for in the EPA monitoring programme.
- In the remaining 79% of waterbodies in Review, there is currently inadequate evidence to determine whether or not the water body is At Risk and measures should be put in place to ensure this additional evidence can be obtained.

A new action has been included in the Programme of Measures which reviews the 208 water bodies where urban wastewater has been identified as a significant pressure.

5.3.7 Flooding

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

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

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

How is this being addressed in the plan?:

The Office of Public Works has responsibility for leading and co-ordinating the implementation of the National Flood Policy.

WFD specific assessment has been drafted. Further consultation on these guidelines has been deferred pending the enactment of the Planning and Development Bill 2022 revising and updating the Planning and Development Acts to ensure that the draft guidance reflects the most up-to-date legal position. The Bill is currently subject to pre-legislative scrutiny in Dail Éireann.

A review of the Arterial Drainage Act 1945 will be undertaken as part of the proposed new National Hydromorphology Programme, which will be overseen by the Hydromorphology Expert Group.

5.3.8 Biodiversity Management

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

How is this being addressed in the plan?:

Since the publication of the draft RBMP considerable collaboration has taken place across government and relevant agencies to develop and implement measures which will deliver multiple policy objectives for water, biodiversity and climate action. This has been a core objective in relation the new agricultural CAP Strategic Plan as well as actions in the planning system, particularly to enhance Nature based solutions for urban runoff. The following additional action has been identified with the intention of delivering multiple policy objectives, where the Cabinet Subcommittee on Environment and Climate Change will further seek to enhance cross government and agency collaboration in delivering habitat restoration measures with multiple policy benefits for water, biodiversity and climate.

5.3.9 Legislative Changes

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

How is this being addressed in the plan?:

Meeting the challenge of protecting and improving Ireland's water quality will continue to be a complex undertaking. There is also a significant challenge in cross-sectoral coordination. Close coordination is need to identify and exploit any potential opportunity and co-benefits for mitigating and adapting to climate change as well as for biodiversity protection. In this cycle there will be an

emphasis on collective efforts and space given to collaborative activities to encourage collaboration and coordination through the governance structures. Ireland's water policy regulations (European Communities (Water Policy) Regulations 2003, as amended) requires every public authority to exercise its functions in a manner which is consistent with the provisions of the Water Framework Directive and to secure compliance with the Directive and with the provisions of any river basin management plan. The water objectives of this plan will be integrated into future policy statements. This includes for example climate adaptation plans, marine spatial planning, flood risk management plans, biodiversity plans, agricultural policy, and into spatial plans. One of the aims of this policy integration is to ensure that the opportunities for multiple benefits are identified and assessed across inter-related policy areas (See Section '*Other Plans and Programmes'* of the text for further details).

A review of the Arterial Drainage Act 1945 will be undertaken as part of the proposed new National Hydromorphology Programme, which will be overseen by the Hydromorphology Expert Group.

5.3.10 Funding

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

How is this being addressed in the plan?

The Programme Delivery Office will support the implementation of the Plan across Departments, Local Authorities, EPA and other key agencies and stakeholders, and will provide clarity and direction to the various implementation bodies and coordinate the implementation of actions contained in Programme of Measures where each action will be assigned a lead body responsible for their implementation and an agreed date of delivery. The Project Delivery Office will also coordinate publication of progress reports, to ensure effective implementation of these actions, which will clearly and comprehensively set out performance against targets, to allow for increased stakeholder engagement. The publication of these reports will be managed through a dedicated Campaign Site and will also be used to facilitate communications and stakeholder engagement on issues regarding the RBMP and water quality.

5.3.11 Drainage

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

How is this being addressed in the plan?:

See Section 'Artificial and Heavily Modified Waterbodies' in the text of the plan for further information in relation to this matter.

5.3.12 Lack of Transparency During Implementation

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

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

How is this being addressed in the plan?:

The Programme Delivery Office will support the implementation of the Plan across Departments, Local Authorities, EPA and other key agencies and stakeholders, and will provide clarity and direction to the various implementation bodies and coordinate the implementation of actions contained in Programme of Measures where each action will be assigned a lead body responsible for their implementation and an agreed date of delivery. The Project Delivery Office will also coordinate publication of progress reports, to ensure effective implementation of these actions, which will clearly and comprehensively set out performance against targets, to allow for increased stakeholder engagement. The publication of these reports will be managed through a dedicated Campaign Site and will also be used to facilitate communications and stakeholder engagement on issues regarding the RBMP and water quality.

The Water Framework Directive application – the WFD App – has been developed by the EPA to facilitate the sharing and reporting of environmental data collection by the organisations involved in the national monitoring programme. For this cycle, the application will be enhanced to allow the tracking of implementation, including both protection and improvement actions, as this is central to the CMP framework. Any actions undertaken by communities will also be recorded where these are reported to local authorities. This data system will centralise all relevant information from implementation bodies on the measures planned, underway and complete.

The EPA will provide access to an annual reporting on progress by each implementation against the Key Performance Indicators and targets in the programme of measures in the third-cycle River Basin Management Plan. Regional Committees and the NCMC will evaluate implementation performance on an ongoing basis. The EPA will continue to report on water quality and water quality trends.

5.3.13 Aquaculture

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

How is this being addressed in the plan?:

The following text has been added to the plan to address this issue:

DHLGH and DAFM will work collaboratively to consider the current aquaculture licensing guidelines and process in order to ensure that the WFD assessment process is provided for. Following examination, both departments, together with the support of the Marine Institute, will work collectively to update the process/guidelines, if required.

In addition, The following text is included in the plan to deal with Shellfish Waters:

For the purposes of improving the protection of shellfish waters, DHLGH will seek to implement a new legislative and management framework for shellfish waters in Ireland. This will include consideration of monitoring, assessment and protection measures. It is envisaged that this will take place in the context of the new regional river basin planning structures proposed for the next cycle. It is expected that this process will be undertaken in the following four steps:

- A review of the quality standards that shellfish waters must meet to ensure adequate protection of the habitat for shellfish.
- The drafting of primary legislation to allow for the designation and protection of shellfish waters by the DHLGH.
- Development of associated regulations by the DHLGH to allow for the identification of shellfish waters and monitoring requirements. This legislation will also allow shellfish waters to be considered as protected areas under the WFD. This work will include the identification of new shellfish areas that require designation.
- Consideration of protected shellfish waters in the WFD characterisation process and the development of measures through the river basin planning structures to protect and restore these waters to ensure they meet the requirements of the quality standards set out in the legislation developed.

5.4 Community Groups / Associations

5.4.1 Waste Water Treatment

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

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

How is this being addressed in the plan?:

Programme of Measures contains action in relation to maintaining a funding stream to upgrade and take in charge towns and villages without wastewater networks to improve the wastewater needs of rural villages that are outside of the current Uisce Éireann collection network.

Extension of Domestic Waste Water Treatment Systems grant scheme to assist with costs of domestic waste water treatment system / septic tank remediation in high status water areas and in Priority Areas for Action where defective systems are posing a risk to waters.

The allowable numbers of discharges per annum from SWO's are licensed by the EPA.

5.4.2 Flooding

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

How is this being addressed in the plan?:

Too localised to comment in a national plan. The Office of Public Works has responsibility for leading and co-ordinating the implementation of the National Flood Policy.

5.4.3 Water Quality

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

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

How is this being addressed in the plan?:

The Programme Delivery Office will support the implementation of the Plan across Departments, Local Authorities, EPA and other key agencies and stakeholders, and will provide clarity and direction to the various implementation bodies and coordinate the implementation of actions contained in Programme of Measures where each action will be assigned a lead body responsible for their implementation and an agreed date of delivery. The Project Delivery Office will also coordinate publication of progress reports, to ensure effective implementation of these actions, which will clearly and comprehensively set out performance against targets, to allow for increased stakeholder engagement. The publication of these reports will be managed through a dedicated Campaign Site and will also be used to facilitate communications and stakeholder engagement on issues regarding the RBMP and water quality. The Water Framework Directive application – the WFD App – has been developed by the EPA to facilitate the sharing and reporting of environmental data collection by the organisations involved in the national monitoring programme. For this cycle, the application will be enhanced to allow the tracking of implementation, including both protection and improvement actions, as this is central to the CMP framework. Any actions undertaken by communities will also be recorded where these are reported to local authorities. This data system will centralise all relevant information from implementation bodies on the measures planned, underway and complete. The EPA will provide access to an annual reporting on progress by each implementation against the Key Performance Indicators and targets in the programme of measures in the third-cycle River Basin Management Plan. Regional Committees and the NCMC will evaluate implementation performance on an ongoing basis. The EPA will continue to report on water quality and water quality trends.

5.4.4 Funding

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

How is this being addressed in the plan?:

The projected expenditure for the 3rd cycle RBMP from 2023 to 2027 is a conservative minimum of €516million. This is a 71% increase on the estimated expenditure for cycle 2 (2015-2021). However, this investment may be increased by government as a more precise picture emerges at the local level through the 46 Catchment Management Plans regarding the measures needed and as more accurate estimates of the cost of measures are made. This plan commits to review progress with the implementation of measures and to reanalyse the distance to environmental targets.

5.4.5 Education

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

How is this being addressed in the plan?:

Building on work already undertaken by the EPA, LAWPRO and various other bodies, DHLGH will provide further supports for the development of a National Water focused Citizen Science Strategy for the monitoring of water quality. This will involve the rollout of the national macroinvertebrate citizen science process developed in the 2nd cycle and development and production of training and citizen science support materials, both of which will be led by LAWPRO. A commitment in the Programme for Government, the Community Water Development Fund, which is managed by LAWPRO will be expanded. The Fund will be further developed and expanded during the 3rd cycle in recognition of the benefit of increased participation of the public in helping to implement the RBMP.

5.4.6 Lack of Prosecutions

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

How is this being addressed in the plan?:

Further information concerning compliance and enforcement, including the Licence and Enforcement Access Portal (LEAP) providing public access to compliance and enforcement records, is available on the EPA website: https://www.epa.ie/our-services/compliance--enforcement/

5.4.7 Protection of SACs

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

How is this being addressed in the plan?:

The Water Environment (Abstractions and Associated Impoundments) Act 2022 was signed into law by the President in December 2022, introducing controls and prior authorisation for abstractions and associated impoundments, via a licensing regime for environmentally significant abstractions. This regime will contribute to the achievement of the environmental objectives for our waterbodies by mitigating the pressure from abstractions on our water environment.

The EPA have identified Integrated Pollution Control (IPC), Industrial Emissions (IE) and waste licenced facilities that are considered a significant pressure on water quality under the WFD, and have prioritised them for enforcement. A site specific enforcement plan has been drawn up for each of the sites and the EPA are carrying out detailed investigations to identify what impact a site may be having on water quality. The EPA will continue to track the progress and implementation of the site specific enforcement plans throughout the 3rd cycle of the RBMP.

5.4.8 Aquaculture

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

How is this being addressed in the plan?:

The following text has been added to the plan to address this issue:

DHLGH and DAFM will work collaboratively to consider the current aquaculture licensing guidelines and process in order to ensure that the WFD assessment process is provided for. Following examination, both departments, together with the support of the Marine Institute, will work collectively to update the process/guidelines, if required.

5.4.9 Agriculture

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

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

deterioration. The process of dealing with areas with poor water quality should be a consultative process carried out in an ASSAP style procedure or by the ASSAP programme itself.

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

How is this being addressed in the plan?:

Development and delivery of a European Innovation Partnership (EIP) for water:

The Water EIP project concept was developed collaboratively by the Department of Agricultural Food and the Marine (DAFM) and the Department of Housing, Local Government and Heritage (DHLGH) to address issues relating to water quality. The project is specifically focused on reducing losses of phosphorus, nitrogen, sediment and, where relevant, pesticides to water from agricultural lands by promoting the adoption of innovative best practice in nutrient management, the application of Nature based Natural Water Retention Measures[1] (NWRM) and other suitable measures.

The need for the Water EIP project arose out of the experience of the Local Authorities Waters Programme (LAWPRO) and the Agricultural Sustainability Support and Advisory Programme (ASSAP) throughout the 2nd cycle River Basin Management Plan. The collaborative effort between the ASSAP, LAWPRO and the EPA involved the use of catchment science tools to identify water quality problems within the Priority Areas for Action (PAAs), and subsequent engagement with farmers in the areas to determine suitable on-farm actions for implementation to improve water quality. However, a gap in funding mechanisms for supporting the implementation of such measures was identified as priority action for the third RBMP cycle and as such the Water EIP was developed.

5.4.10 Other Sectoral Pressures

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

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

How is this being addressed in the plan?:

The RBMP contains a specific chapter on Coastal issues. The chapter on Forestry outlines the programmes and schemes that will address forestry-related pressures on our waterbodies.

5.4.11 Invasive Species

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

[1] https://www.catchments.ie/download/wfd-natural-water-retention-measures/

How is this being addressed in the plan?:

Building on work already undertaken by the EPA, LAWPRO and various other bodies, DHLGH will provide further supports for the development of a National Water focused Citizen Science Strategy for the monitoring of water quality. This will involve the rollout of the national macroinvertebrate citizen science process developed in the 2nd cycle and development and production of training and citizen science support materials, both of which will be led by LAWPRO. A commitment in the Programme for Government, the Community Water Development Fund, which is managed by LAWPRO will be expanded. The Fund will be further developed and expanded during the 3rd cycle in recognition of the benefit of increased participation of the public in helping to implement the RBMP.

5.5 Company and Corporate

5.5.1 Invasive Species

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

How is this being addressed in the plan?:

The 3rd RBMP will continue to drive the implementation of the measures contained in the 2nd RBMP. In particular, this includes the finalisation of legislation for the implementation of the EU IAS Regulation and the delivery of draft management plans. Work is also underway on drafting a National Management Plan for Invasive Alien Species to deliver on the commitment made in the Programme for Government. This will require the convening of a Steering Group to finalise the draft management plan, and public consultation and stakeholder engagement to inform the management plan prior to publication.

5.5.2 Peat Extraction and Drainage

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

How is this being addressed in the plan?:

This decrease is acknowledged in the text of the plan.

5.5.3 Dublin Airport

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

How is this being addressed in the plan?

The Programme of Measures identifies the individual actions listed under each of the specific pressures on water quality. Each measure is assigned to a lead organisation, with a delivery timeframe, which will report on its progress to the Project Delivery Office. The Programme of Measures is being supported by the implementation of catchment management plans by LAWPRO for each of the 46 catchments.

5.6 Members of Public

5.6.1 Internal Reviews within Departments / Agencies

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

How is this being addressed in the plan?:

Meeting the challenge of protecting and improving Ireland's water quality will continue to be a complex undertaking. There is also a significant challenge in cross-sectoral coordination. Close coordination is need to identify and exploit any potential opportunity and co-benefits for mitigating and adapting to climate change as well as for biodiversity protection. In this cycle there will be an emphasis on collective efforts and space given to collaborative activities to encourage collaboration and coordination through the governance structures. Ireland's water policy regulations (European Communities (Water Policy) Regulations 2003, as amended) requires every public authority to exercise its functions in a manner which is consistent with the provisions of the Water Framework Directive and to secure compliance with the Directive and with the provisions of any river basin management plan.

5.6.2 Drinking Water Quality

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

How is this being addressed in the plan?:

Recast Drinking Water Directive and associated national Regulations require monitoring of raw water quality.

5.6.3 Complaints Procedure

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

How is this being addressed in the plan?:

The See It? Say It! phone application, developed by the EPA, helps to collect and direct your environmental concern to the correct local authority so that they can take action and address it. This includes the facility to upload photographs. The See It? Say It! phone app complements the 24 hour National Environmental Complaints Line (NECL) 1850 365 121 where you can also report issues such as backyard burning, fly tipping, water pollution, odours and littering. The phone line is available 24hrs a day, 7 days a week and all calls are answered by dedicated staff who will pass the reported information to the relevant local authorities.

5.6.4 Forestry Issues

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

How is this being addressed in the plan?:

Under the 2014 Forestry Act and enacting legislation, the Minister for Agriculture, Food and the Marine is required to promote and monitor the protection and enhancement of water quality when assessing applications for forestry activities. In doing so, DAFM must ensure that forestry operations and forest-based activities regulated under the Act are compatible with the requirements of the Water Framework Directive. For the purposes of supporting the third River Basin Management Plan the DAFM *Forests & Water* document will be reviewed and updated as the Forestry Sector plan supporting the 46 Local Catchment Management Plans. The updated Forests & Water document will include; • An assessment of the changes in water bodies identified as being at risk from forestry during the 2nd cycle • Tabulated actions proposed for the 233 waterbodies at risk from Forestry, outlining what forestry activities are likely to be the cause of the significant pressure and the measures to address these.

- As part of the distance to target analysis process led by the EPA, the impact of sectoral plans, including that for Forestry, will be assessed as part of the preparation of the 46 Local Catchment Plans.

5.6.5 Issues Related to Dams

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

How is this being addressed in the plan?:

The proposed new National Hydromorphology Programme will mitigate hydromorphological pressures on a case-by-case basis depending on the type of hydromorphological pressure encountered.

5.6.6 Waste Water Management

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

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

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

How is this being addressed in the plan?:

An action has been included in the Programme of Measures where Uisce Éireann have outlined their wastewater infrastructure projects for the 3rd cycle of the RBMP 2022-2027.

5.6.7 Farmers and Water Quality

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

How is this being addressed in the plan?:

The ACRES Cooperation Project, which sits under Ireland's CAP Strategic Plan aims to deliver for water quality, biodiversity and climate. Approximately 75% of our high status objective water bodies are included within the ACRES CP zones. A participant farmer in the ACRES CP approach will have the assistance of a Local Cooperation Project Team in relation to the implementation of measures under the scheme at local level.

The CP teams aim to deliver training and engagement events for local farmers and farm advisors to broaden their knowledge on risks to water quality, biodiversity loss etc. and with regards to the measures that may be implemented to help protect and/or restore water quality status in their local areas.

In addition, the Water EIP project which was developed collaboratively by DAFM and the Department of Housing, Local Government and Heritage (DHLGH) will address issues relating to water quality. The project is specifically focused on reducing losses of phosphorus, nitrogen, sediment and, where relevant, pesticides to water from agricultural lands by promoting the adoption of innovative best practice in nutrient management, the application of Nature based Natural Water Retention Measures[2] (NWRM) and other suitable measures.

The Water EIP aims to deliver further engagement with farmers to educate them on the risks to water quality on their farms and the measures that could be put in place to help protect and/or restore water quality status at a local level. This will be done through an expansion of the work of the Local Authorities Waters Programme (LAWPRO) and the Agricultural Sustainability Support and Advisory Programme (ASSAP) completed in the 2nd cycle. The Water EIP will also support the implementation of required measures.

5.6.8 Invasive Species

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

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

How is this being addressed in the plan?:

The 3rd RBMP will continue to drive the implementation of the measures contained in the 2nd RBMP. In particular, this includes the finalisation of legislation for the implementation of the EU IAS Regulation and the delivery of draft management plans.

Work is also underway on drafting a National Management Plan for Invasive Alien Species to deliver on the commitment made in the Programme for Government. This will require the convening of a Steering Group to finalise the draft management plan, and public consultation and stakeholder engagement to inform the management plan prior to publication.

[2] https://www.catchments.ie/download/wfd-natural-water-retention-measures/

5.7 Political Party

5.7.1 Approach of the Plan

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

How is this being addressed in the plan?:

Since the publication of the draft RBMP considerable collaboration has taken place across government and relevant agencies to develop and implement measures which will deliver multiple policy objectives for water, biodiversity and climate action. This has been a core objective in relation the new agricultural CAP Strategic Plan as well as actions in the planning system, particularly to enhance Nature based solutions for urban runoff.

Meeting the challenge of protecting and improving Ireland's water quality will continue to be a complex undertaking. There is also a significant challenge in cross-sectoral coordination. Close coordination is need to identify and exploit any potential opportunity and co-benefits for mitigating and adapting to climate change as well as for biodiversity protection. In this cycle there will be an emphasis on collective efforts and space given to collaborative activities to encourage collaboration and coordination through the governance structures. Ireland's water policy regulations (European Communities (Water Policy) Regulations 2003, as amended) requires every public authority to exercise its functions in a manner which is consistent with the provisions of the Water Framework Directive and to secure compliance with the Directive and with the provisions of any river basin management plan. The water objectives of this plan will be integrated into future policy statements. This includes for example climate adaptation plans, marine spatial planning, flood risk management plans, biodiversity plans, agricultural policy, and into spatial plans. One of the aims of this policy integration is to ensure that the opportunities for multiple benefits are identified and assessed across inter-related policy areas (See Section '*Other Plans and Programmes'* of the text for further details).

5.7.2 Plan Implementation

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

How is this being addressed in the plan?:

The Programme Delivery Office will support the implementation of the Plan across Departments, Local Authorities, EPA and other key agencies and stakeholders, and will provide clarity and direction to the various implementation bodies and coordinate the implementation of actions contained in Programme of Measures where each action will be assigned a lead body responsible for their implementation and an agreed date of delivery. The Project Delivery Office will also coordinate

publication of progress reports, to ensure effective implementation of these actions, which will clearly and comprehensively set out performance against targets, to allow for increased stakeholder engagement. The publication of these reports will be managed through a dedicated Campaign Site and will also be used to facilitate communications and stakeholder engagement on issues regarding the RBMP and water quality.

The RBMP includes actions in the Programme of Measures which highlight Uisce Éireann's continued investment in urban wastewater infrastructure between 2020 and 2027. A new action has been included in the Programme of Measures which reviews the 208 water bodies where urban wastewater has been identified as a significant pressure.

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

Natura Impact Statement

3rd Cycle River Basin Management Plan

Prepared by the Department of
Housing, Local Government and Heritage
gov.ie

Table of Contents

PREFACE 1

INTRODUCTION 2

1.1 Layout of the Natura Impact Statement 3

1.2 Legislative Context 4

1.2.1 European Sites 4

1.3 Purpose of the Appropriate Assessment Process 5

1.4 Stages of Appropriate Assessment 5

1.5 Overlap with the Strategic Environmental Assessment of the RBMP 6

1.6 Consultation 7

1.6.1 Consultation on the Draft RBMP 1

2 Background and Overview of the RBMP 4

2.1 Responsible Authority for River Basin Management Planning 4

2.2 Area Covered by the Plan 4

2.3 Aims and Objectives of the Plan 5

2.4 Content of the 3rd Cycle RBMP 7

2.5 Implementation Structure 9

3 Assessment Methodology 11

3.1 Guidance Documents on AA 11

3.2 Guiding Principles and Case Law 12

3.3 Information Sources Consulted 13

3.4 Impact Prediction 14

3.5 Aspects of the RBMP to be Assessed 14

3.5.1 Likely Significant Effects 16

3.6 Approach to Appropriate Assessment for the RBMP 16

3.6.1 Stage 1 - Screening for Appropriate Assessment 16
3.6.2 Stage 2 - Appropriate Assessment 17
4 Overview of the Receiving Environment 18
4.1 Identification of European Sites and Zone of Influence 19
4.2 Conservation Objectives 22
4.3 Conservation Status of EU Protected Habitats and Species 22
4.4 Current Status of Surface and Ground Water 24
4.4.1 Groundwater 27
4.5 Existing Threats and Pressures to EU Protected Habitats and Species 27
4.6 Relevant Biodiversity Policy 29
5 Stage 1: Screening for Appropriate Assessment 31
5.1 Screening Conclusion 31
6 Stage 2: Appropriate Assessment 32
6.1 Introduction 32
6.2 Approach to Assessment 33
6.3 Prediction of Effects 33
6.3.1 Context for Impact Prediction 33
6.3.1.1 Linkages Between the Nature Directives and the Water Framework Directive 34
6.3.2 Impact Identification 34
6.3.3 Impact Prediction 37
6.4 Assessment of Draft RBMP Actions 38
6.4.1 Ireland's River Basin 39
6.4.1.1 Shared River Basins with NI 39
6.4.1.2 What We Want to Achieve 39
6.4.1.3 Other Plans and Programmes 43

6.4.2 Our Water Resource 44
6.4.2.1 Current Conditions of Our Waters 44
6.4.2.2 Artificial and Heavily Modified Water Bodies 44
6.4.2.3 Impacts of Climate Change 45
6.4.3 Implementation of Second Cycle Plan 46
6.4.3.1 Continued Monitoring, Evaluation and Review 46
6.4.4 Programme of Measures 47
6.4.4.1 Protection of Water Bodies 47
6.4.4.2 Structural / Societal 48
6.4.4.3 Implementation / Governance 50
6.4.4.4 Public Participation Measures 52
6.4.5 Environmental Measures 56
6.4.5.1 Agriculture Measures 56
6.4.5.2 Hydromorphology Measures 60
6.4.5.3 Forestry 64
6.4.5.4 Urban Wastewater 71
6.4.5.5 Urban Pressures 76
6.4.5.6 Domestic Wastewater Measures 79
6.4.5.7 Unknown 81
6.4.5.8 Other 82
6.4.5.9 Peat Measures 82
6.4.5.10 Industry, Mines and Quarries Measures 88
6.4.5.11 Drinking Water Measures 88
6.4.5.12 Invasive Alien Species Measures 89
6.4.5.13 Hazardous Chemicals Measures 92

6.4.5.14 Aquaculture Measures 92
6.4.5.15 Land Use and Planning Measures 93
6.4.5.16 Economic Measures 94
6.5 In Combination Effects 99
7 Amendments to the Draft RBMP post-Consultation 121
7.1 Consultation 121
7.2 Assessment of Proposed Amendments to the Draft RBMP 127
7.2.1 The Importance of Protecting our Natural Waters 128
7.2.2 The Status of Ireland's Water Bodies 130
7.2.3 Setting Environmental Objectives 131
7.2.4 Measures Required 134
7.2.5 Programme of Measures to 2027 135
7.2.5.1 Overview of the Programme of Measures 135
7.2.5.2 Environmental Measures 137
7.2.6 Implementation and Governance 183
7.2.7 Public and Stakeholder Engagement 188
7.2.8 Economic Analysis of Water Use 188
8 Mitigation Measures 194
9 Conclusions on the RBMP 204
10 Determination 206

PREFACE

The Department of Housing, Local Government and Heritage (DHLGH) has prepared Ireland's 3rd Cycle River Basin Management Plan (hereafter referred to as the "RBMP" or "the Plan") which will cover a six-year period from 2022-2027.

The purpose of this Natura Impact Statement (NIS) is to record the assessment process which has been applied to date as part of the Appropriate Assessment (AA) for the RBMP under Article 6(3) of the EU Habitats Directive [92/43/EEC] as transposed through the Birds and Natural Habitats Regulations 2011, as amended. The Competent Authority for the AA determination is the Ecological Assessment Unit (EAU) within the National Parks and Wildlife Service of the Department of Housing, Local Government and Heritage.

In preparing this NIS, a multi-stage approach has been taken. The purpose of this staged approach has been to align the AA process with the requirements of the Strategic Environmental Assessment (SEA) Directive [2001/42/EC] process, which is also required to support the development of the RBMP. Article 3.2(b) of the SEA Directive expressly links to assessments pursuant to Article 6 of Directive 92/43/EEC. The preparation of the SEA and AA reporting comprises an integrated approach, such as sharing of baseline data mapping of European sites, sharing of potential ecological effects on European sites and clarification on more technical aspects of the RBMP. These processes together have informed and shaped the development of the RBMP.

This NIS records the AA carried out from RBMP inception to the making of the final RBMP. The pre-consultation NIS was prepared by RPS and was subject to public consultation, which concluded in 2022. Since then, additional consultation with key environmental stakeholders in response to their extensive public consultation submissions has been undertaken to ensure all relevant feedback was captured by the RBMP. Following this consultation, the pre-consultation NIS was updated and finalised by DHLGH. Blue text has been used throughout the original document to highlight any areas that have been updated in relation to the baseline.

INTRODUCTION

The Department of Housing, Local Government and Heritage (DHLGH) has prepared Ireland's 3rd Cycle River Basin Management Plan (hereafter referred to as the "RBMP" or "the Plan") which will cover a six-year period from 2022-2027. It sets out the objectives and recommendations to be pursued until 2027 and beyond in order to improve the management of water in Ireland and to achieve the objectives of the Water Framework Directive (WFD); taking into account the progress made over the first and second cycle plan as well as changes that have occurred since the previous plan was published in 2018.

The RBMP has been prepared by the DHLGH in accordance with the Water Framework Directive (2000/60/EC). The first such plan was published in 2009 and was replaced by a second plan published in 2018. The third plan covers the period 2022-2027.

With reference to the legislative context summarised below, a Stage 1 - Appropriate Assessment (AA) Screening Report was prepared by RPS with respect to the draft RBMP during Q1 2021 (see **Appendix A**). This concluded that the draft Plan was:

- Not directly connected with or necessary to the management of a European site; and,
- Likely Significant Effects (LSE), either alone or in combination, on European sites could not be ruled out.

On that basis, the AA Screening Report states that, applying the precautionary principle and with reference to Article 6(3) of the EU Habitats Directive, a Stage 2 – Natura Impact Statement (NIS) is required. The pre-consultation draft NIS was prepared by RPS, and this post-consultation NIS has been updated by DHLGH following extensive public consultation.

This final NIS has been prepared based on the conclusions of the AA Screening Report. It will assess, in view of best scientific knowledge and applying the precautionary principle, whether the Plan, either individually or in combination with other plans or projects, may adversely affect the integrity of any European site(s). The assessment will be carried out in accordance with the legal context outlined in **Section 1.1** below.

By its nature, the RBMP is a high-level document, which supports the achievement of WFD objectives and is administered by DHLGH. It does not, in and of its own right, confer

planning permission for any specific development but rather provides a framework within which to achieve WFD objectives.

1.1 Layout of the Natura Impact Statement

As noted in the preface, a multi-stage approach has been applied to the preparation of the NIS to align it with the stages of Strategic Environmental Assessment, which is being undertaken in parallel under Directive 2001/42/EC.

This NIS therefore presents the assessments and mitigation relating to the draft RBMP 27th September 2021; and the final version of the RBMP, which is proposed for adoption. The layout of this material is as follows:

Chapters 1-5 deal with the description of the RBMP, approach and methodology for the NIS, supporting information in relation to the Natura 2000 Network and a summary of the AA Screening undertaken on the RBMP. Minor updates have been made to these chapters to reflect the move from the draft to final RBMP and streamlining of text for readability. Where significant changes / additions to text have been made to the chapters, they are highlighted in blue text.

Sections 6.4 and 6.5 present the main assessment chapter in relation to the NIS prepared to accompany the draft RBMP for public consultation. In the main, this chapter is unaltered from the NIS which was prepared to accompany the draft RBMP, which was the subject of public consultation between 27th September 2021 and 31st March 2022. Where significant changes have been made to the chapter, they are highlighted in blue text.

Chapter 7 has been added to address amendments made to the draft RBMP following public consultation. All proposed changes were assessed in the context of their potential to adversely affect the integrity of European site(s), alone or in combination with other plans and projects.

Chapter 8 presents the mitigation measures required in relation to implementation of the proposed final RBMP and how they have been addressed in the final RBMP to be adopted.

Chapter 9 includes the overall conclusion of the NIS in relation to the final RBMP as proposed for adoption.

1.2 Legislative Context

1.2.1 European Sites

The Council Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora, better known as 'The Habitats Directive', provides legal protection for habitats and species of European importance. Articles 3 to 9 of the Directive provide the legislative means to protect habitats and species of Community interest through the establishment and conservation of a European Union (EU)-wide network of sites known as Natura 2000 (hereafter referred to as 'European sites'). European sites comprise:

- Special Areas of Conservation (SAC) designated for habitats, plants, and non-bird species, under the Habitats Directive (92/43/EEC); and
- Special Protection Areas (SPA) designated for bird species and their habitats, under the Birds Directive (79/409/ECC as codified by Directive 2009/147/EC).

Article 6 of the Habitats Directive plays a crucial role in the management of the sites that make up the Natura 2000 network[1]. Articles 6(1) and 6(2) set out the need to identify conservation objectives and prevent deterioration of the habitats and species for which the sites have been designated. Articles 6(3) and 6(4) of the Habitats Directive set out the decision-making tests for plans and projects likely to affect European Sites (Annex 1.1).

Article 6(3) establishes the requirement for Appropriate Assessment (AA):

> *Any plan or project not directly connected with or necessary to the management of the [European] site but likely to have a significant effect thereon, either individually or in combination with other plans or projects, shall be subjected to appropriate assessment of its implications for the site in view of the site's conservation objectives. In light of the conclusions of the assessment of the implications for the site and subject to the provisions of paragraph 4, the competent national authorities shall agree to the plan or project only after having ascertained that it will not adversely affect the integrity of the site concerned and, if appropriate, after having obtained the opinion of the general public.*

[1] Managing Natura 2000 sites. The provisions of Article 6 of the 'Habitats' Directive 92/43/EEC" EC 2018.

Article 6(4) states:

> *If, in spite of a negative assessment of the implications for the [European] site and in the absence of alternative solutions, a plan or project must nevertheless be carried out for imperative reasons of overriding public interest, including those of a social or economic nature, Member States shall take all compensatory measures necessary to ensure that the overall coherence of Natura 2000 is protected. It shall inform the Commission of the compensatory measures adopted.*

The Habitats Directive has been transposed into Irish law by the Planning and Development Act 2000 (as amended) and the European Communities (Birds and Natural Habitats) Regulations 2011 (as amended). In the context of the RBMP, the governing legislation is principally the European Communities (Birds and Natural Habitats) Regulations 2011, as amended, and specifically Article 27 which sets out the duties of public authorities (in this case the DHLGH) relating to nature conservation; and Article 42 which addresses AA. If screening for AA determines the likelihood for significant effects on a European site(s), in view of the conservation objectives of the site, then AA must be carried out for the plan, including the compilation of a Natura Impact Statement (NIS) to inform the decision-making.

1.3 Purpose of the Appropriate Assessment Process

The overall purpose of the AA process is to ensure that the RBMP does not result in any adverse effects on the integrity of any European sites in view of its conservation objectives. This NIS has been prepared to inform the AA process, having regard to the legislative requirements of EU and national law as outlined previously. The responsibility for carrying out the AA lies with the Ecological Assessment Unit of the National Parks and Wildlife Service. The NIS will inform the AA determination made by the EAU at the time of adoption of the RBMP. The AA determination will be published alongside the adopted RBMP.

1.4 Stages of Appropriate Assessment

Stage 1: Screening / Test of Significance: This process identifies whether the proposed plan / project is directly connected to or necessary for the management of a European site(s) and identifies whether the plan / project is likely to have significant impacts upon a European site(s) either alone or in combination with other plans / projects. The output from

this stage is a determination of not significant, significant, potentially significant, or uncertain effects. The latter three determinations will cause the plan / project to be brought forward to Stage 2.

Stage 2: Appropriate Assessment: This stage considers the impact of the proposed development on the integrity of a European site(s), either alone or in combination with other plans / projects, with respect to: (i) the site's conservation objectives; and (ii) the site's structure, function and its overall integrity. The output from this stage is an NIS. This document must include sufficient information for the competent authority to carry out the appropriate assessment. If the assessment is negative, i.e. adverse effects on the integrity of a site cannot be excluded despite incorporation of measures to avoid or reduce the adverse effects, then the process must consider alternatives (Stage 3).

Stage 3: Assessment of Alternatives: This process examines alternative ways of achieving the objectives of the plan / project that avoid adverse impacts on the integrity of a European site. This assessment may be carried out concurrently with Stage 2 in order to find the most appropriate solution. If no alternatives exist or all alternatives would result in negative impacts to the integrity of the European sites, then the process either moves to Stage 4 or the plan / project is abandoned.

Stage 4: Assessment where Adverse Impacts Remain: This stage is undertaken when it has been determined that a plan / project will have adverse effects on the integrity of a European Site, but that no alternatives exist. It includes the identification of compensatory measures where, in the context of Imperative Reasons of Overriding Public Interest (IROPI), it is deemed that the project or plan should proceed.

1.5 Overlap with the Strategic Environmental Assessment of the RBMP

A Strategic Environmental Assessment (SEA) of the RBMP has been carried out concurrently with the preparation of the NIS. The purpose of the SEA is to evaluate at an early stage, the range of environmental consequences that may occur as a result of implementing the RBMP and to give interested parties an opportunity to comment on the perceived or actual environmental impacts of the plan. There is a degree of overlap between the requirements of the SEA and AA and, in accordance with best practice, an integrated process of data sharing has been carried out, such as sharing of baseline data

and mapping of European sites, sharing of potential ecological effects of the RBMP on European sites and clarification on more technical aspects of the RBMP. These processes together have informed and shaped the development of the RBMP.

It is also noted that there are issues relevant to the Habitats Directive that are not strictly related to AA, including Article 10 and 12 of the Directive. In these cases, the issues have been brought forward to the biodiversity, flora and fauna section of the SEA and have been addressed in that context as part of the wider environmental assessments informing the RBMP.

1.6 Consultation

In 2019, the Department prepared a Significant Water Management Issues (SWMI) document to assist in scoping the draft 3rd cycle RBMP. This consultation pre-dated the commencement of the SEA and AA. A summary of the issues raised through the SWMI can be found on the consultation page of the Department's website at www.gov.ie/housing.

On commencement of the SEA and AA processes, consultation driven by the mandatory requirements under the SEA Directive also came into effect and from the outset; the opportunity has been taken to consult with stakeholders in relation to both the SEA and the AA processes as they relate to the RBMP.

An SEA Scoping Report was provided to the specific environmental authorities including the Development Applications Unit which co-ordinates responses from NPWS among other heritage divisions in the Department. This included reference to the parallel and integrated AA process. In recognition of the potential for transboundary effects, contact was also initiated with Northern Ireland. A number of responses were received including some that had direct bearing upon the AA process. The following **Table 2-1** is a summary of consultation responses received.

Table 2-1: Responses

Consultee	Summary of Points Raised
Department of the Environment, Climate and Communications	GSI encouraged the use of and reference to their dataset and outlined in more detail the available data sets with regard to the five sectors: Geo-heritage, Groundwater, Geological Mapping, Geohazards and Geochemistry of soils, water samples and sediments.
Inland Fisheries Ireland	IFI suggests for the Plan to prioritise maintenance and (where possible) restoration of ecological status in surface waters with a particular emphasis on high quality Q5

Consultee	Summary of Points Raised
	sites and systems (which have recently been flagged again in the EPS's SWMI report as showing a worrying decline); IFI would welcome the opportunity to liaise further on potential synergies with regard to the Plan and IFI's Climate Action Mandate as the current process evolves; IFI endorses the selection of topics as outlined in *Table 5-1 to 5-9* and objectives as outlined in Section 7 of the SEA Scoping Report and lists 13 topics to be considered in terms of environmental impacts on Irelands fisheries resource; IFI would welcome the opportunity to contribute to the development of the monitoring programme which will be developed to facilitate monitoring of environmental effects during implementation of the 3rd Cycle RBMP; IFI suggests that all available consideration and support should be afforded to the 'Blue Dot Catchment Programme' and other targeted initiatives which focus on the protection and/or restoration of improved ecological status in water bodies. IFI advocates application of the precautionary principle when considering the fisheries resource / aquatic ecology in the current process.
Environmental Protection Agency	EPA references their own 'State of the Environment Report 2020' (SOER 2020) with particular reference to Chapter 7 and the need to tackle water pollution at water catchment level; The SEA should clearly set out the scope, remit and implementation related elements of the Plan; EPA outlines additional National Plans and EU/International legislation which should be considered; EPA also outlined the need to consider Green Public Procurement; In Table 5.2 Potential Environmental Issues for Biodiversity, Flora and Fauna, it may be useful to also consider marine, coastal and estuarine related habitats and species, where linkages exist with the RBMP. Particularly where additional coastal and marine designated sites may be proposed over the lifetime of the Plan; In Table 5-3: Potential Significant Environmental Issues for Land and Soils, the spreading of sludge from waste water treatment plants on agricultural land should be included here; The SEA should consider the current use of municipal sludge on soils, taking into consideration approaches to sludge management and reuse in other EU Member States; Table 5-4: Potential Significant Environmental Issues for Water, there is merit in considering the impact of landfill leachate treatment in urban waste water treatment plants in this table; EPA also proposes that The Population and Human Health Objective could be updated "To support sustainable use of water resources and to protect human health"; With regards Biodiversity, Flora and Fauna, consider amending Objective 2 to incorporate the need to protect associated ecological corridors and linkages adjacent to designated habitats Additional objectives to consider for biodiversity include 'Support the delivery of green and blue infrastructure and sustainable urban development schemes. Regarding Climate Factors, consider amending the text of Objective 6 as follows: "Contribute to a climate resilient water sector"; Consider the addition of 'support and promote water conservation' as an objective; EPA noted the proposed methodology to consideration of alternatives and welcome that the EPA's guidance on assessment of alternatives is being taken into account; All recommendations from the SEA and appropriate assessment (AA) processes, including mitigation measures, should be integrated in the Plan; Recommend including schematics in the Plan and SEA Environmental Report, showing the links and key inter-relationships with other key relevant national, regional, sectoral and environmental plans;

Consultee	Summary of Points Raised
	In between review periods for the Plan, recommend that Plan-related implementation reports be published annually, or biennially, as appropriate. Recommend aligning the Plan implementation monitoring/reporting with the environmental monitoring required under the SEA legislation; The SEA-related monitoring should address positive, negative and cumulative effects where they are likely to occur and should include provision for on-going review to facilitate an early response to any environmental issues that may arise; and. List of various available guidance and resources including SEA mapping tools included.
Department of Agriculture, Food and the Marine	Evaluation and consideration of potential impacts of river basin management on any commercial sea fishing activities needs to be given consideration; Imperative that engagement should be sought with the fishing industry and other relevant stakeholders as early as possible to discuss any changes that may affect them.
Department of Agriculture, Environment and Rural Affairs Northern Ireland	DAERA would like the SEA Environmental Report to contain a clear statement indicating the opinion about whether the implementation of the strategy is likely to have a significant effect on Northern Ireland both directly and indirectly. DAERA referenced the NI Draft River Basin Management Plan for the 3rd cycle period which runs from 2021-2027 which should also be considered as part of the assessment. Relevant documentation is linked by DAERA for reference. DAERA listed all relevant policy, plans and legislation that will impact each area. Natural Environment Division The SEA must consider all transboundary issues, including the potential disturbance to/impact on NI/RoI migratory/mobile species such as salmon, for example within the Lough Melvin Special Area of Conservation which lies within both Northern Ireland and Ireland. Marine Planning Team Commented that the scope of the Plan should be extended to clearly include the marine water environment, particularly transitional and coastal waters. Marine Conservation and Reporting Guidance Documents listed. Inland Fisheries Inland Fisheries would suggest the inclusion of the - North Atlantic Salmon Conservation Organisation (NASCO), Convention for the Conservation of Salmon in the North Atlantic Implementation Plan for the period 2019 – 2024. In reference to Table 5-2: Potential Significant Environmental Issues for Biodiversity, Flora and Fauna, Inland Fisheries suggested inclusion of: '*Effects on Freshwater Pearl Mussel, salmonids, priority species their habitats and other protected fish and shellfish species' and also 'Potential for habitat loss and fragmentation, including barriers to fish migration in transboundary water courses'*. In reference to Table 7-1: Biodiversity, Flora and Fauna (BFF) Inland Fisheries suggested adjustment to Objective 2. Drinking Water Inspectorate Table 5-4, Water (W), additional emphasis on Drinking Water Quality could be made. Additional issues suggested: Impacts to Drinking Water Protected Areas; Impacts to catchments and reservoirs used for Drinking Water supply. Historic Environment Division Value of considering the potential for impacts on understanding of transboundary post medieval vernacular heritage and historic settlement patterns, aspects of the historic environment which are intertwined with landscape, and which can be indicated through historic ordnance survey maps. Table 6-1; baseline data should include datasets held in relation to Northern Ireland's Historic Environment, maintained by the Department for Communities.

1.6.1 Consultation on the Draft RBMP

On the 27th September 2021, the Minister for Housing, Local Government and Heritage published the draft RBMP 2022-2027 and invited submissions, observations and comments on the proposed plan during a 6-month consultation process, which closed on 31st March 2022. A number of media were provided to give people the opportunity to get involved and have their say on how the plan should be developed. Submissions were received through a combination of the department's online survey and by direct email.

A total of 1,401 submissions were received directly by the DHLGH from private individuals and groups. These groups included government departments and agencies, local authorities, Non-Governmental Organisations, community groups, companies, corporate bodies, members of the public and political parties. The Water Forum (An Fóram Uisce) brought together the views of many stakeholders with an interest in water and, following intensive discussion and deliberation, submitted a comprehensive document as part of this process.

These submissions were initially categorised as submissions based on:

Consultation Response Questionnaire issued by DHLGH (161);

Template response [originating from the Sustainable Water Network (SWAN), a network of environmental NGOs] (1172); and

Individual 'free style' responses from a cross section of stakeholders (68).

Of these, 259 were identified as unique content. RPS were appointed by DHLGH to review these submissions. Thirty-eight themes were identified across the 259 submissions reviewed. The key issues raised within the ten most prominent themes are summarised below.

Water Quality / Pollution: Key issues raised included the need for clear water governance and adequate investment; lack of specific measures to improve water quality in the plan; inefficient liaison with water stakeholders; transparency from authorities working in the water sector; large number of water bodies being subjected to wastewater pollution and extensive arterial drainage; lack of prosecution for defaulters and impact of water quality on public health.

Agricultural Practices: The key issues raised included the lack of recognition of the conflict between agriculture and WFD targets; urgency related to nutrient pollution; need

for better incentives for farmers to promote good practices; stronger enforcement; need for WFD specific farm assessments; and the heavy reliance on Agricultural Sustainability Support and Advisory Programme (ASSAP).

Public Engagement and Awareness: The key issues raised included the inadequate public participation measures in the plan; need for a comprehensive, transparent, and participative public engagement programme; role for citizen science programmes and community involvement with provision of appropriate funding for same; and the need for simple and effective complaints channel for the public to report any pollution event. The importance of education in relation to water quality, agricultural practices, and invasive species was also raised in submissions.

Local Authority: The key issues were highlighted in relation to the Local Authorities including lack of funding; lack of adequate resourcing; availability of training to deliver necessary measures; role of Local Authorities to sustain, drive, fund, and coordinate community involvement; and the development and implementation of the proposed catchment management plans.

Level of Ambition: The key issues raised on this issue in the submissions was that the level of ambitions in the plan is considered inadequate; that there is a need for measures to be more targeted, measurable, time bound and based on more Key Performance Indicators (KPIs); and more focussed targeted climate change measures dealing with flooding, sea level rise and storage/reservoirs along with coastal specific measures were also recommended.

Sewage Pollution: The key issues raised included the onerous and strict nature of the grant application process for domestic waste water treatment system (DWWTS); more investment and inspectors for proper inspection of all the malfunctioning DWWT setups; the need for the Irish Water Investment Plan to end sewage pollution from all the waste water treatment plants identified as the main pollution source; and the urgent need for upgrade or replacement of specific WWTP was noted.

Department / Agency: The key issues included the need for every department/agency to carry out an internal review in respect of its role under the RBMP; the RBMP must ensure that a joined-up approach is taken to the preservation of water quality and wastewater management; and a single lead agency must be identified and resourced adequately to monitor and uphold key performance metrics for successful implementation of the plan.

Co-ordination: The key issues were the need for greater coordination among the implementation bodies in particular Local Authorities and the Department of Agriculture, Food and the Marine (DAFM); the imperative of policy coherence between water, climate and biodiversity plans and measures; clarity on the responsibilities of different stakeholders towards the improvement of water quality; requirement for a strong collaborative approach; and the need to work positively with the farming sector to deliver improvements in water quality.

Funding: References were related to the significant need for appropriate funding and resourcing to deliver necessary measures.

Forestry: The key issues included the requirement for WFD specific assessment and site-specific conditions for all planting and felling licences in the forestry sector.

Peat: Requirement for a list of all water bodies that have been impacted by peat extraction to be included in the plan; need for peat-specific targets; prohibition of wetland drainage; need for a National Wetland Restoration Plan; and incentives and grants to support such measures.

Shellfish Waters / Aquaculture: Better integration for shellfish waters / aquaculture in the plan; and need for all potential pressures from aquaculture to be included in the plan and need for effective monitoring to be put in place.

Other: Requirement of restoration programme including re-meandering, re-establishment of natural riparian zones etc.; urgency to halt the release of hazardous substances into water bodies; and constant need for compliance assurance and need for proper monitoring to track the progress of plan implementation etc.

2 Background and Overview of the RBMP

This chapter provides an overview of the RBMP for the period 2022-2027 and sets out the actions to be pursued over that period to improve the management of water and achievement of the WFD objectives. The key measures, which have been subject to the SEA and AA process are documented as part of this NIS and the Environmental Report. The material assessed and presented in this NIS relates to the RBMP, which was updated to account for the public consultation feedback.

2.1 Responsible Authority for River Basin Management Planning

The competent authority for preparation of the 3rd Cycle RBMP is the Minister of Housing, Local Government and Heritage.

2.2 Area Covered by the Plan

A single national River Basin District was defined for the 2nd Cycle RBMP and this will be carried forward for the 3rd cycle. The Irish River Basin District covers an area of 70,273 km^2, with 46 catchment management units – consisting of 583 subcatchments with 4,842 water bodies ranging from three to 15 water bodies in each subcatchment. These 4,842 water bodies are made up of six water body types, as shown in **Figure 2-1**.

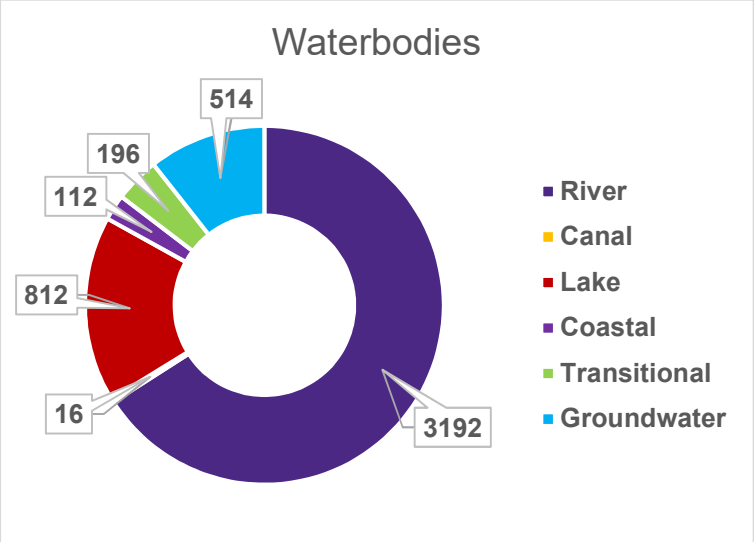


Figure 2-1: Breakdown and Number of Water Body Types

In addition to the water bodies wholly within Ireland, there are also a number of International River Basins with shared jurisdiction. In these cases, coordination will be undertaken with the relevant authorities in Northern Ireland. This coordination is ongoing through various working groups which form part of the WFD Governance structure and Northern Ireland Environment Agency (NIEA) are represented at a number of these governance groups.

In cooperation with Northern Ireland, DHLGH will be preparing a "shared waters" document that will detail the water bodies that flow into or through both jurisdictions and the work to be undertaken to ensure they meet their environmental objectives.

2.3 Aims and Objectives of the Plan

As outlined in the WFD, the RBMP must include a Programme of Measures to protect and restore bodies of water to at least 'good status' by 2027 (with some limited exemptions). To achieve this, the 3rd Cycle RBMP will build on achievements in the second cycle, in particular,

New governance and implementation structures; and

Establishment of Uisce Éireann ~~Irish Water~~, An Fóram Uisce, the Local Authority Waters Programme (LAWPRO) and the Agricultural Sustainability Support and Advisory Programme (ASSAP).

To help build on these initiatives, further learning will be gained from the research programmes led by the IPA in relation to water governance and the ESRI in relation to the impact of river basin management strategies on human attitudes and behaviours have been initiated.

However, progress in restoring impacted waters and protecting waters from deterioration has been slow and more targeted actions are required for the 3rd cycle plan. While existing water protection measures must continue to be implemented and accelerated, new targeted and effective measures are also necessary. Many of these measures will have co-benefits for climate mitigation and will help to enhance biodiversity.

The proposed themes for this plan are based on the premise "the right measure, in the right place" and will be supported and delivered by:

- An increased level of ambition;

- Integrated Catchment Planning;
- Multiple benefits; and
- Role Clarity and Collaborative Implementation.

The estimates of the scale of action includes:

- 2,500 km of riverside interception measures (e.g. 12,500 hectares of native woodlands). This is a cumulative length representing 3% of all river channels.
- Minimum of 20,000 hectares of organic soil rewetting. This will deliver water, climate and biodiversity benefits.
- At least a 50% reduction in nitrogen losses to waters from agriculture. Modelling work is underway to determine what this means for chemical nitrogen fertiliser reductions and, very importantly, where those reductions need to take place.
- Further detailed examination of 2,000 to 7,000 structures/barriers on rivers that potentially require removal or modification
- A sustained high level of investment by Irish Water in wastewater infrastructure to address deficits and future growth needs.
- Further work is also needed in preventing further deterioration of water bodies. This includes a focus on; increased compliance; and increased and smarter investment.

Of particular relevance to the Appropriate Assessment process is the link between the Water Framework Directive and the Birds Directive (2009/147/EC) and the Habitats Directive (92/43/EEC). Article 6 of the Water Framework Directive requires each Member State to establish a register of protected areas for water bodies or parts of water bodies that must have extra controls on their quality by virtue of how their waters are used by people and wildlife. Areas designated for the protection of habitats or species, where the maintenance or improvement of the status of water is an important factor in their protection are included on the register and include those sites designated under the Birds Directive and the Habitats Directive.

2.4 Content of the 3rd Cycle RBMP

An overview of the 3rd Cycle RBMP is detailed in **Table 2-1**.

Table 2-1: 3rd Cycle RBMP Summary Overview

RBMP Chapter Reference	Content
1. The Importance of Protecting our Natural Waters	The Importance of Protecting our Natural Waters The Water Policy Landscape A Water Action Plan for Ireland What is the Water Framework Directive? Connection to Other Plans and Programmes
2. Status of Ireland's Water Bodies	Description of Ireland's River Basin District Monitoring Programme Catchments Data Website Description of International / Shared Waters Description of the Land Use Where We Stand Now – Ireland's Water Quality Significant Pressures Water Quality and Nutrient Concentrations in Irish Waters
3. Setting Environmental Objectives	Setting Environmental Objectives Analysis of the Gap to Achieving Water Framework Directive Environmental Objectives Environmental Objectives for Protected Areas Environmental Objectives for Water Bodies Designated as Artificial or Heavily Modified Water Bodies
4. Measures Required	Basic Measures Supplementary Measures Progress in Implementing Measures During Cycle 2 (2018-2021) Implementing Measures in Cycle 3 (up to 2027)
5. Programme of Measures to 2027	Overview of the Programme of Measures Water Body Areas for Targeted Action (Areas for Action) Environmental Measures Summary of the Main Measures within the Programme of Measures Agriculture Physical Modifications (Hydromorphology) Forestry Urban Wastewater Urban Runoff Domestic Wastewater Discharges (Septic Tanks) Unknown Pressures Other Pressures Peatlands Industry, Mines and Quarries Drinking Water Source Protection Invasive Alien Species Hazardous Chemicals in the Aquatic Environment Aquaculture Land Use Planning

RBMP Chapter Reference	Content
	Coastal and Transitional Waters – How Measures will Contribute to their Protection and Restoration
6. Implementation and Governance	Governance Catchment Management Work Plans and Sectoral Action Work Plans Further Enhancement to the Water Sector Governance Public Participation Continued Monitoring, Evaluation and Review Other Plans and Programmes
7. Public and Stakeholder Engagement	Consultation Responses
8. Economic Analysis of Water Use	Update and Review of Economic Analysis Application of Article 9 (Recovery of Costs) Water Re-Use Funding the Programme of Measures Future Ireland and Infrastructure, Climate and Nature Fund Bill, 2023
9. List of Actions	List of Actions
Appendix 1	Programme of Measures: Further information on the environmental measures to 2027
Appendix 2	Programme of Measures: List of Measures
Appendix 3	Correlation Table with Directive Text, including Annex VII
Appendix 4	List of Areas for Action
Appendix 5	HMWB Candidate List
Appendix 6	Urban Wastewater Project List – Uisce Éireann
Appendix 7	List of 197 water bodies – Urban Waste Water
Appendix 8	Improvement Works to SWO's – Uisce Éireann
Appendix 9	Uisce Éireann RC3 Project List
Appendix 10	SEA Statement
Appendix 11	AA Determination
Appendix 12	NIS Mitigation Table

2.5 Implementation Structure

In terms of implementation of the plan, this is a shared function across a number of tiers, notably:

- Tier 1 - the Minister for Housing, Local Government and Heritage has responsibility for policy, necessary legislation and resourcing the Plan;
- Tier 2 - led by the Environmental Protection Agency (EPA), this tier is responsible for the catchment characterisation process and assisting and advising the Minister. The EPA continues to lead on stakeholder networking and knowledge sharing; and
- Tier 3 - local authorities, who have responsibility for co-ordinating the implementation of measures on the ground, and the local knowledge required for successful delivery of many potential measures. The Local Authority Waters Programme (LAWPRO) is a shared service supporting local authorities in their role.

To support this tiered structure, a number of implementation groups have been established which will interact to deliver the RBMP as outlined below and in **Figure 2-2**.

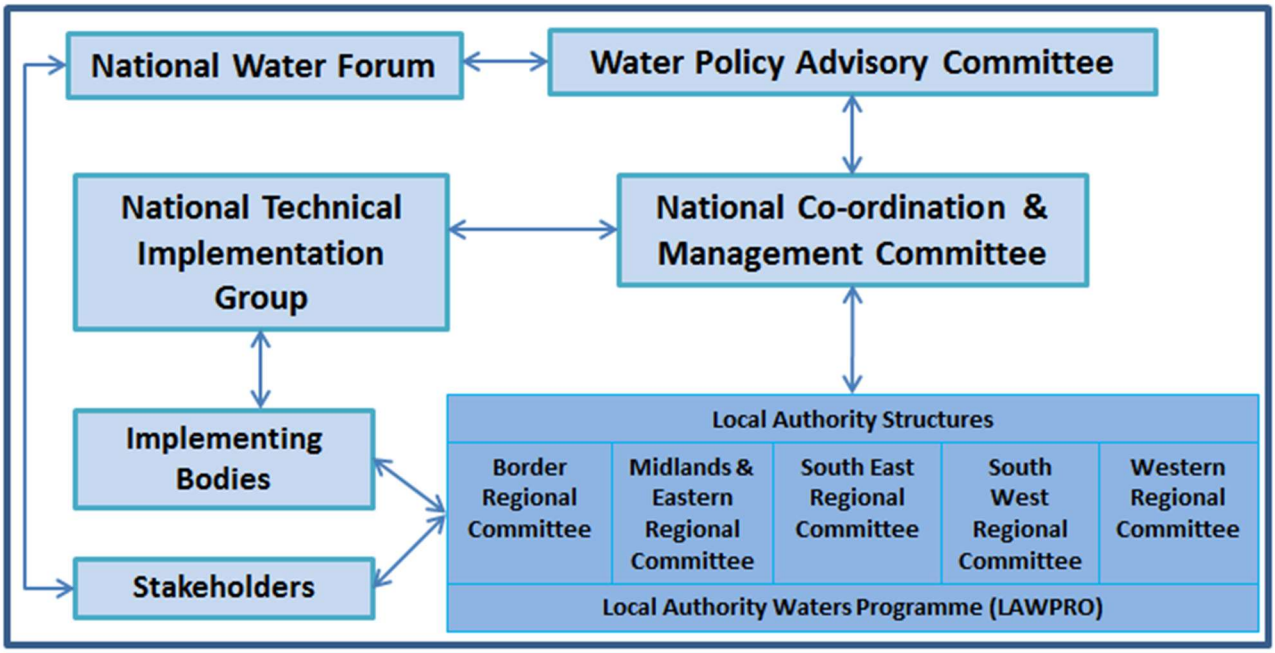


Figure 2-2: Implementation Structure

Water Policy Advisory Committee (WPAC): established as part of the structures for the preparation of the RBMP, provides high-level policy direction and oversight of implementation. The WPAC will also advise the Minister with regard both to progress of the plan and to the preparation of Programmes of Measures necessary to achieve the

environmental objectives. The WPAC will continue to be chaired by a representative of the Minister, currently an Assistant Secretary of the Department of Housing, Local Government and Heritage (DHLGH).

An Fóram Uisce (the Water Forum): established in 2017, it is an independent entity with broad functions that include advising the WPAC in relation to river basin management plans, on matters pertaining to the objectives of the WFD, and on related matters concerning the management of Ireland's water resources. The Forum provides an interface between science, citizen/stakeholder engagement and water policy.

National Co-ordination and Management Committee (NCMC): set up under the WPAC to ensure that the measures necessary to achieve our objectives are implemented in an efficient, effective and co-ordinated way. The NCMC provides an interface between science, policy and programme delivery. It was established to oversee the overall work programmes and report to the WPAC on progress. The NCMC is chaired by the DHLGH and comprises representatives of the DHLGH, the Environmental Protection Agency (EPA) and the chairs of the regional committees.

National Technical Implementation Group (NTIG): oversees technical implementation of the RBMP at a national level and provides a forum to ensure co-ordinated actions among all relevant State actors. It also addresses any operational barriers to implementation that may arise. Chaired by the EPA the membership includes all the relevant implementation bodies for the WFD. Providing the NCMC with updates on the implementation and effectiveness of measures, the NTIG reviews progress on an on-going basis. This group is also being used as a forum for knowledge sharing.

EPA: co-ordinates the ongoing tracking of the implementation of actions and, in conjunction with others and by means of the monitoring programme, undertakes the assessment of the effectiveness of those actions in terms of water quality outcomes.

Local Authority Waters Programme (LAWPRO): the regional local authority structures, with five local authority regional committees, drive delivery of supporting measures at local level. LAWPRO also has an important role in in these structures by ensuring public and stakeholder engagement with the implementation of measures at local level and in providing further scientific analysis of pressures in the priority catchments.

3 Assessment Methodology

3.1 Guidance Documents on AA

The AA requirements of Article 6 of the Habitats Directive follow the approach as outlined in the following legislation, guidance documents and Departmental Circulars, namely:

European Legislation

- Council Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora (also known as the 'Habitats Directive'); and
- Council Directive 2009/147/EC on the conservation of wild birds, codified version, (also known as the 'Birds Directive').

National Legislation

- European Communities (Birds and Natural Habitats) Regulations 2011 (as amended); and
- Planning and Development Act 2000 (as amended).

European Guidance

- Managing Natura 2000 sites: the provisions of Article 6 of the 'Habitats' Directive 92/43/EEC, European Commission (2018);
- Interpretation Manual of European Union Habitats. Version EUR 28, European Commission (EC, 2013).
- EC study on evaluating and improving permitting procedures related to Natura 2000 requirements under Article 6.3 of the Habitats Directive 92/43/EEC, European Commission (2013);
- Guidance document on the strict protection of animal species of Community Interest under the Habitats Directive 92/43/EEC', European Commission (EC, 2007);
- Guidance Document on Article 6(4) of the 'Habitats Directive' 92/43/EEC. Clarification of the concepts of: Alternative Solutions, Imperative Reasons of Overriding Public Interest, Compensatory Measures, Overall Coherence, Opinion of the Commission, European Commission (2007);

- Assessment of Plans and Projects Significantly Affecting Natura 2000 sites: Methodological Guidance on the Provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC, European Commission (2001); and
- Communication from the Commission on the Precautionary Principle, European Commission (2000b).

National Guidance

- Appropriate Assessment of Plans and Projects in Ireland: Guidance for Planning Authorities. DEHLG (2009, revised 10/02/10).
- Guidance on the Strict Protection of Certain Animal and Plant Species under the Habitats Directive in Ireland. NPWS, Department of Housing, Local Government and Heritage (2021).
- Strict Protection of Animal Species. Guidance for Public Authorities on the Application of Article 12 and 16 of the EU Habitats Directive to development works undertaken by or on behalf of a Public Authority. NPWS, Department of Housing, Local Government and Heritage (2021).

Irish Government Department / NPWS Circulars

- Appropriate Assessment under Article 6 of the Habitats Directive: Guidance for Planning Authorities. Circular NPWS 1/10 and PSSP 2/10. (DEHLG, 2010);
- Appropriate Assessment of Land Use Plans. Circular Letter SEA 1/08 & NPWS 1/08;
- Guidance on Compliance with Regulation 23 of the Habitats Directive. Circular Letter NPWS 2/07; and
- Compliance Conditions in respect of Developments requiring (1) Environmental Impact Assessment (EIA); or (2) having potential impacts on Natura 2000 sites. Circular Letter PD 2/07 and NPWS 1/07.

3.2 Guiding Principles and Case Law

Over time, legal interpretation has been sought on the practical application of the legislation concerning AA as some terminology has been found to be unclear. European and national case law has clarified a number of issues and some aspects of the published

guidance documents have been superseded by case law. Case law has been considered in the preparation of the NIS of the RBMP.

3.3 Information Sources Consulted

The following general sources of information have been consulted for background environmental information.

- Information provided by the Department of Housing, Local Government and Heritage on the RBMP;
- Department of Housing, Local Government and Heritage– online land use mapping https://viewer.myplan.ie/;
- GeoHive online mapping http://map.geohive.ie/mapviewer.html;
- Ordnance Survey of Ireland – online mapping and aerial photography www.osi.ie;
- National Parks and Wildlife Service – online European site information www.npws.ie;
- Northern Ireland Environment Agency – online European Site information www.daera-ni.gov.uk;
- Ireland's Article 17 Reports 2019, National Parks and Wildlife Service, Department of Culture, Heritage and the Gaeltacht;
- Ireland's Article 12 submission to the EU Commission on the *Status and Trends of Bird Species (2008-2012)*;
- Environmental Protection Agency (EPA) – EPA Maps https://gis.epa.ie/EPAMaps/;
- CORINE (Co-Ordinated Information on the Environment) data series was established by the European Community (EC) www.epa.ie/soilandbiodiversity/soils/land/corine/;
- Information on river basin districts / catchments – https://www.catchments.ie/;
- Geological Survey of Ireland (GSI) – geology, soils and hydrogeology www.gsi.ie;
- Forest Cover Datasets https://www.agriculture.gov.ie/forestservice;
- *Format for a Prioritised Action Framework (PAF) for Natura 2000* www.npws.ie/sites/default/files/general/PAF-IE-2014.pdf;

- *Ireland's 4th National Biodiversity Action Plan 2023-2030* (NPWS, 2023)[2]; and
- Information on the Conservation Status of Birds in Ireland (Colhoun & Cummins, 2013).

3.4 Impact Prediction

The methodology for the assessment of impacts is derived from the *Assessment of Plans and Projects Significantly Affecting Natura 2000 Sites* (EC, 2001)[3]. When describing changes/activities and impacts on ecosystem structure and function, the types of impacts that are commonly presented include:

- Direct and indirect effects;
- Short and long-term effects;
- Construction, operational and decommissioning effects; and
- Isolated, interactive and cumulative effects.

A "source-pathway-receptor" approach has been applied for this assessment. The **source** relates to the actions and policies outlined in the draft RBMP, which have the potential to adversely impact European sites, e.g. changes to hydrology. The **pathways** relate to how implementation of the draft RBMP can potentially impact European sites, e.g. habitat loss/fragmentation, disturbance to species, impacts to water quality. The **receptor** is the Natura 2000 Network, potentially including those transboundary sites for which there is a pathway of connectivity as a result of the implementation of the RBMP.

3.5 Aspects of the RBMP to be Assessed

Aspects of the 3rd Cycle RBMP planned actions and implementation for the general environment and sectoral activity were considered in this assessment. **Table 3-1** sets out the aspects of the 3rd Cycle RBMP and identifies those to be assessed as part of this NIS and the rationale for their assessment.

[2] Available online at: https://www.npws.ie/legislation/national-biodiversity-plan. Accessed: March 2024.

[3] Assessment of plans and Projects Significantly Affecting Natura 2000 sites; Methodological Guidance on the Provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC, European Commission

Table 3-1: Elements of the RBMP Assessed in the NIS

RBMP Chapter Reference	Content
1. The Importance of Protecting our Natural Waters	Yes – some implementation and governance actions included in this chapter
2. Status of Ireland's Water Bodies	Yes – primarily factual information with two governance actions included in this chapter
3. Setting Environmental Objectives	Yes – some implementation and governance actions and climate change actions within this chapter
4. Measures Required	Yes – primarily factual information with one implementation action included in this chapter
5. Programme of Measures to 2027	Yes – this is the Programme of Measures for the identified pressures. However, there is a very limited spatial element included in the actions therefore the level of assessment at this stage does not relate to specific European sites, their CO and QIs/SCIs in the main. There are a number of site-specific actions which will be subject to assessment with respect to the European sites within their Zone of Influence
6. Implementation and Governance	Yes – primarily factual information on process, with some implementation and governance actions included in this chapter
7. Public and Stakeholder Engagement	Yes – primarily factual information relating to public consultation and stakeholder engagement for the RBMP, with one action
8. Economic Analysis of Water Use	Yes – some implementation and governance actions included in this chapter
9. List of Actions	List of actions previously assessed in all other chapters
Appendix 1	No – factual information correlating to WFD requirements.
Appendix 2	Yes – includes the list of measures included through Chapters 2-5 above
Appendix 3	No – none included
Appendix 4	No – list of the areas identified by the EPA as priority areas for action
Appendix 5	No – none included
Appendix 6	No – none included

RBMP Chapter Reference	Content
Appendix 7	No – none included
Appendix 8	No – none included
Appendix 9	No – none included
Appendix 10	No – none included
Appendix 11	No – none included
Appendix 12	Yes – includes some measures included through Chapters 2-5 above

3.5.1 Likely Significant Effects

The threshold for a Likely Significant Effect (LSE) is treated in the screening exercise as being above a *de minimis* level[4]. The opinion of the Advocate General in CJEU case C-258/11 outlines:

> '*the requirement that the effect in question be 'significant' exists in order to lay down a de minimis threshold. Plans or projects that have no appreciable effect on a European site are thereby excluded. If all plans or projects capable of having any effect whatsoever on the site were to be caught by Article 6(3), activities on or near the site would risk being impossible by reason of legislative overkill.*'

In this report, therefore, 'relevant' European sites are those within the potential Zone of Influence (ZoI) of activities where LSE pathways to European sites were identified through the source-pathway-receptor model.

3.6 Approach to Appropriate Assessment for the RBMP

The Appropriate Assessment (AA) process for the RBMP has involved AA Screening and full AA with preparation of a NIS.

3.6.1 Stage 1 - Screening for Appropriate Assessment

The Screening for AA included the following steps:

- Determining whether the plan is directly connected with or necessary to the conservation management of any European sites;

[4] *Sweetman v. An Bord Pleanála* (Court of Justice of the EU, case C-285/11). A de minimis effect is a level of risk that is too small to be concerned with when considering ecological requirements of an Annex I habitat or a population of Annex II species present on a European site necessary to ensure their favourable conservation condition. If low level effects on habitats or individuals of species are judged to be in this order of magnitude and that judgment has been made in the absence of reasonable scientific doubt, then those effects are not considered to be likely significant effects.

- Describing the plan; and
- Assessing the likelihood of significant effects.

3.6.2 Stage 2 - Appropriate Assessment

The requirement to prepare an NIS and complete Stage 2 AA is resultant on the AA Screening Determination by the Competent Authority, in this case the EAU within NPWS. The AA included the following steps:

- Identification of the information required, including details of proposed plan, linkages to QIs/SCIs of European sites;
- Examination of the conservation objectives of QIs/SCIs of European sites; and
- Prediction of any adverse effect of the plan on the integrity of any European sites, including in-combination effects.

It is noted that this NIS relates to a plan rather than a project, and as such, a two-stage approach has been taken to reflect the plan-making process under the SEA Directive, which requires a draft and final stage. The first stage of assessment therefore related to the draft RBMP, which was subject to consultation alongside the draft plan and SEA Environmental Report. Following stakeholder feedback and updates to the plan, all changes were screened for likely significant effects. An AA Determination will be made by the Competent Authority prior to finalising and adopting the plan.

4 Overview of the Receiving Environment

Ireland has obligations under EU law to protect and conserve biodiversity. This relates to habitats and species both within and outside designated sites. Nationally, Ireland has developed its 4th National Biodiversity Action Plan[5] to address issues and halt the loss of biodiversity, in line with international commitments. The overall vision in the 3rd National Biodiversity Action Plan (NBAP) was that "*biodiversity and ecosystems in Ireland are conserved and restored, delivering benefits essential for all sectors of society and that Ireland contributes to efforts to halt the loss of biodiversity and the degradation of ecosystems in the EU and globally."* Building on that vision, the 4th NBAP aims to deliver transformative changes required to the ways in which we value and protect nature, striving for a "whole of government, whole of society" approach to the governance and conservation of biodiversity.

The 4th NBAP builds on the previous plan and will continue to implement actions within the framework of five strategic objectives, while addressing new and emerging issues. Objective 2 *Meet Urgent Conservation and Restoration Needs* has the primary aim of acting on the most urgent national conservation and restoration challenges facing Ireland. It specifically addresses the protection and restoration of existing designated areas and species as being crucial to the achievement of this objective. The related targets are:

By 2024, enhances implementation of the Habitats and Birds Directives;

By 2030, trends in the status of the protected habitats and species under the Habitats and Birds Directives are improving;

By 2025, NPWS has reviewed its licensing and consent system to facilitate sustainable activities within Natura 2000 sites;

By 2030, in line with the EU Biodiversity Strategy, habitats and species under the Habitats and Birds Directives show no deterioration in conservation trends and status and at least 30% of those not in favourable status will reach that status or show a positive trend;

By 2024, Ireland has identified preliminary areas that will be pledged as future protected areas under the EU Biodiversity Strategy;

[5] Ireland's 4th National Biodiversity Action Plan, NPWS, DHLGH 2023.

By 2030, deliver management actions for threatened species; and

By 2030, NPWS has increased and enhanced its network of National Parks and Nature Reserves.

Many of the pressures driving biodiversity loss are in line with the pressures identified by the RBMP, including for example: overgrazing, water and air pollution, alien and problematic species, development, land drainage, urban wastewater, river barriers and modifications of coastal areas. Similarly, there is overlap in protective measures.

4.1 Identification of European Sites and Zone of Influence

In Ireland, sites within the Natura 2000 Network are referred to as European sites and comprise SACs and SPAs. SACs are concerned with the protection of specific Qualifying interests (QI) and SPAs are concerned with the protection of specific Special Conservation Interests (SCI).

In identifying the Zone of Influence (ZoI) for the AA Screening of the draft 3rd Cycle RBMP, a number of considerations were taken into account, notably the national and strategic nature of the plan; the relationship of listed QI and SCI for Ireland; and European sites understood to have connectivity. The AA Screening Report considered that since the draft 3rd Cycle RBMP was a national plan that all the European sites within Ireland and relevant sites and receptors in Northern Ireland were considered. For consistency, the ZoI for the final 3rd Cycle RBMP adopts the same approach.

In Ireland, there are 441 SACs[6] which are designated for one or more of 59 habitat types (Annex I of the Directive), 16 of which are designated as 'priority' habitats, owing to their ecological vulnerability, and 26 species (Annex II of the Directive), of which one or more are included as qualifying interests. These are mostly inshore but a small number of reef sites lie far offshore. In addition to the marine mammals listed on Annex II of the Habitats Directive, there are further 22 cetacean species and the leatherback turtle listed on Annex IV. These species require strict protection and, like species on Annex II, require monitoring. There are 58 SAC designated in Northern Ireland.

Through the Birds Directive, SPA designated for the protection of endangered species of wild birds including listed rare and vulnerable species, regularly occurring migratory

[6] Updated as per NPWS SAC Datasheets dated October 2023.

species as well as wetland habitats that support such species. Currently there are 166 SPAs designated[7] within Ireland and 16 SPAs designated in Northern Ireland.

Table 4-1 provides a summary breakdown of the European sites in Ireland. While many are obvious based on their location, other links are more circumspect. The SAC and SPA designated sites within the Zone of Influence are listed in Appendix B to Appendix E. **Figure 4.1** illustrates the distribution of the Irish SAC and SPA in relation to the 3rd Cycle RBMP study area.

It is acknowledged that the number of European sites designated, and their boundaries, are subject to change over time and must therefore be verified on an ongoing basis.

Table 4-1: European Sites in Ireland

Special Areas of Conservation (SAC)	441*
Special Protection Area (SPA)	166*

**Numbers retrieved from the NPWS website (www.npws.ie) April 2024*

In Northern Ireland there are 58 SACs, 16 SPAs, 20 Ramsar and 394 Areas of Special Scientific Interest (ASSIs).[8] ASSIs are areas of land with national conservation value. Three additional European Sites and one National Site were recently adopted under the Marine Act (Northern Ireland) 2013 which are in close proximity to transboundary waters: Carlingford Marine Proposed SPA (pSPA), East Coast Marine pSPA, North Channel Proposed SAC (pSAC) and Carlingford Marine Conservation Zone (MCZ). Some designations in Ireland, such as Carlingford Lough SPA and Carlingford Shore SAC, extend into Northern Ireland and as such present potential for transboundary effects.

No specific locations are proposed therefore it is not practical for this report to identify transboundary sites in any detail. AA on lower tier plans and indeed sectoral plans will be in a position to consider transboundary issues in more detail where geographic context can be added.

[7] Updated as per NPWS SPA Datasheets dated October 2023.

[8] https://www.daera-ni.gov.uk/protected-areas [accessed April 2024]



Figure 4-1: Distribution of Ireland's SACs and SPAs in Relation to the RBMP [Source: https://gis.epa.ie/EPAMaps/ accessed April 2024]

4.2 Conservation Objectives

Site-specific conservation objectives (SSCO) aim to define favourable conservation condition for a particular habitat or species at a European site. Maintaining habitats and species in a favourable conservation condition then contributes to the wider objective to maintain those most vulnerable habitats and species at favourable status throughout their range within the Natura 2000 Network.

At an individual site level, SSCO specify whether the objective is to maintain or to restore favourable conservation condition of the habitat or species, and they set out attributes and targets that define the objectives. It is the aim of the DHLGH[9] to produce SSCOs for all European sites in due course[10]. QI and SCI are annexed habitats and annexed species of community interest for which an SAC or SPA has been designated. The SSCOs for European sites are set out to ensure that the QIs/SCIs of that site are maintained or restored to a favourable conservation condition/conservation status.

A full listing of the COs and QIs/SCIs that each European site is designated for, as well as the attributes and targets to maintain or restore the QIs/ SCIs to a favourable conservation condition are available from the NPWS website www.npws.ie.

It is noted that the existing conservation condition of some habitats and species is unfavourable at present for various reasons, including because of exceedance in environmental quality parameters. This is discussed further in the next section.

4.3 Conservation Status of EU Protected Habitats and Species

In 2007, 2013 and again in 2019 the National Parks and Wildlife Service (NPWS) published a report detailing the conservation status in Ireland of habitats and species listed in the EU Habitats Directive (92/43/EEC), often referred to as "*the Article 17 Report*"[11]. Under the Habitats Directive, each Member State is obliged to undertake surveillance of the conservation status of the natural habitats and species in the Annexes and under Article 17, to report to the European Commission every six years on their status and on the

[9] Note: As of September 2020, a number of department names changes and in some cases functions have moved. The National Parks and Wildlife Service (NPWS) was previously part of the Department of Culture, Heritage and the Gaeltacht (DCHG) and is now part of the Department of Housing, Local Government and Heritage (DHLGH).

[10] https://www.npws.ie/sites/default/files/protected-sites/conservation_objectives/

[11] The Status of EU Protected Habitats and Species in Ireland, NPWS 2007 (Vol 1-3), 2013 (Vol 1 -3) and 2019 (Vol 1-3).

implementation of the measures taken under the Directive. **Appendix F** sets out a summary of the conservation status of each habitat and species from 2007 to 2019.

For the 2019 submission, Ireland's Article 17 Report recorded 15% of habitats as "*favourable"*, 46% as "*inadequate*" and 39% as "*bad*". Among the key findings were:

Many Irish habitats are in unfavourable status. Many are still declining albeit with some positive actions underway while almost half are demonstrating ongoing declines;

The main pressures to habitats are from grazing; pollution of watercourses; drainage/cutting of peatlands and wetlands; invasive species; recreation; [urbanisation; fertiliser application; and road building among others];

Some of the marine habitats are considered to be improving, and to have better prospects, due in part to implementation of other EU environmental directives; and

Many freshwater habitats are considered unfavourable due to nutrient loading within the catchment; however, the RBMP will aim to ensure improved targeting of mitigation measures.

From the 2019 report, 57% of species were assessed as "*favourable*", 15% as "*inadequate*", 15% as "*bad*" and 13% as "*unknown*" or considered to be vagrant species. Among the key findings are:

Salmon (*Salmo salar*) is assessed as inadequate ~~showing signs of improvement~~ and the Killarney shad (*Alosa killarnensis*) is still assessed as "*favourable*", but some other fish remain at "*bad*" status; and

Freshwater pearl mussel is "*bad*" and declining.

Similarly, the requirements for reporting under Article 12 of the Birds Directive (2009/147/EC) are every six years. Ireland's Article 12 submission to the EU Commission on the status and trends of bird species covers 196 species which includes breeding, wintering and passage species. The report details that some species have had significant increases in population over the long term, including raven (*Corvus corax*), collared dove (*Streptopelia decaocto*), buzzard (*Buteo buteo*) and blackcap (*Sylvia atricapilla*). However, other species have undergone significant declines in their long-term breeding population trend: corncrake (*Crex crex*) (85%), curlew (*Numenius arquata*) (98%), lapwing (*Vanellus vanellus*) (88%) and redshank (*Tringa totanus*) (88%). The hen harrier (*Circus cyaneus*) shows a long-term population trend decrease of 27%. The results confirm that there is a

need for measures to halt the declines noted above, most of which are due largely to changes in farming practices and intensity, and also the increase of activity in extensively farmed uplands through forests and wind farm construction.

The assessment and outlook are overall very poor. Biodiversity losses and habitat changes continue on an international scale. EU conservation status reporting indicates generally declining trends and unfavourable status for many habitats, with 85% having unfavourable status. Many species are faring better, but 15% are in decline at EU level, mostly freshwater species. Agricultural activities remain the key pressure. The outlook is very poor, with climate change adding to challenges and cumulative impacts.

The 2018 report, Sustainable Development in the European Union, warned of the worrying decline in nature globally, with species extinction rates accelerating. The UN stating that biodiversity is in crisis. In Ireland, the majority of the most ecologically important habitats are reported to be of inadequate or bad conservation status. Ireland's 4th National Biodiversity Action Plan 2023-2030 reports that over 20% of assessed species in Ireland are threatened with extinction and 85% of Ireland's EU protected habitats are at unfavourable status, with 46% showing ongoing declines. Almost one third of Ireland's EU protected species are in unfavourable status and over half of native Irish plant species have declined. The plan attributes this to a wide range of threats and pressures including over- and under-grazing, land abandonment, water and air pollution, alien and problematic species, recreation, development, land drainage, urban wastewater, river barriers and the modification of coastal areas. Based on the poor conservation status of many important habitats and some species, considerable efforts and resources will be required to improve their status, both within and outside protected areas.

It's likely that pressures due to climate change, agricultural system changes and invasive species will remain the same or increase unless immediate action is applied.

4.4 Current Status of Surface and Ground Water

In total, the EPA assesses over 4,000 surface water bodies for ecological status and 514 groundwater bodies are assessed for groundwater status. The monitoring programme is carried out over a 6-year period. The following analysis is based on the most recent

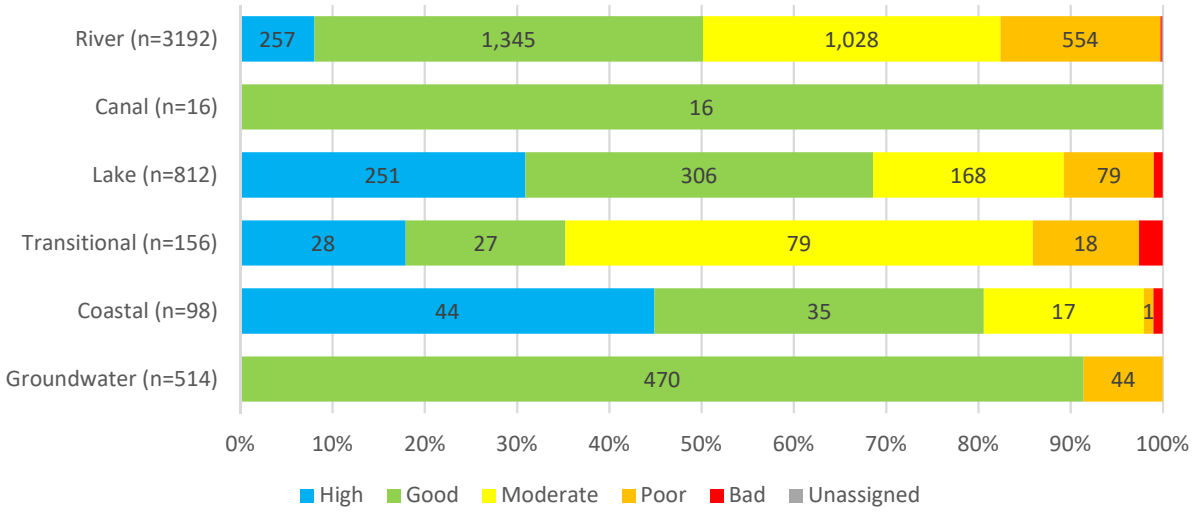
assessment of water bodies over the period 2016-2021.[12] The current status of surface water and groundwater bodies in Ireland for the 2016-2021 monitoring period is presented in Figure 4-2. Surface Waters

Overall, 54% of assessed surface water bodies have achieved Good or High ecological status for 2016-2021. The remaining 46% of surface water bodies are at Moderate, Poor or Bad ecological status. Since the previous monitoring period (2010-2015), 68.1% of surface water bodies remained stable and did not change status. There was a deterioration in status for 15.7% of surface waters and 16.2% experienced an improvement in status.

Of note is the continued decline in the number of High status surface water bodies – from 329 in the 2007-2009 period to 267 for the 2016-2021 WFD period. While the number of Bad status water bodies has remained reasonably stable, there has been a significant increase in the number of the Poor status water bodies from 357 in 2007-2009 period to 485 for 2016-2021. This points to an upward trend in the number of polluted surface waters up to the 2021 period. Ireland had also seen a ten-fold decline over the past three decades in the number of the most pristine water bodies (i.e. those achieving Q5 biological quality), from over 500 in the 1980s to just 20 in 2018. However, the number of Q5 sites had increased to 32 as of 2021.

The latest water quality monitoring for 2016-2021 showed water quality in 443 water bodies improved while it declined in 428. This latest data also shows that almost 43% of river sites have unsatisfactory nitrate concentrations; the majority are in the south and southeast, with most of the nitrogen (85%) coming from agriculture. In parts of the east, urban wastewater is also a significant contributor. In terms of phosphate, 30% of river sites have unsatisfactory concentrations. The rate of change over 2013-2021 indicates 39.4% of sites had an increasing trend. For monitored lake water bodies, the EPA reported 33% have unsatisfactory total phosphorus concentrations for 2019-2021. Most lakes (67%) have high or good biological quality for 2019-2021.

[12] EPA (2022) Water Quality in Ireland 2016-2021. Available at: https://www.epa.ie/publications/monitoring--assessment/freshwater--marine/EPA_WaterQualityReport2016_2021.pdf



Source: *DHLGH RBMP 2021-2027.*

Figure 4-2: Summary of WFD Ecological Status for Surface and Groundwaters (2016-2021)

Nitrogen is the limiting nutrient in transitional and coastal (TraC) water bodies. The EPA latest reporting found 100 of 156 monitored transitional waters (64%) and 19 of 98 coastal waters (19%) were in unsatisfactory condition for dissolved inorganic nitrogen (DIN) levels, with the highest median winter DIN concentrations found along the east and southeast coasts which are receiving riverine inputs which have elevated and increasing nitrate concentrations.

The majority of TraCs (89%) were in satisfactory condition for phosphate based on winter phosphate concentrations. Inputs of total phosphorus and nitrogen from 19 major rivers that input to the marine environment are also monitored by the EPA. The data reported indicates that total nitrogen loads have increased by 11,131 tonne (20%) and total phosphorus loads by 394 tonnes (37%) in the 2019-2021 period compared to 2016-2018.

Of the surface water bodies sampled for chemical status over the 2016-2021 period, 52% of surface water bodies assessed were reported as being in Good chemical status. For the remaining water bodies classed as having Poor chemical status, the main substances causing failure include mercury, PAHs, polybrominated diphenyl ethers [PBDEs] (a class of flame retardant). Some of these substances such as mercury and PAHs are ubiquitous in the environment and continue to be present at low levels in some water bodies, often for decades after measures are put in place to reduce them at source e.g. mercury is a common transboundary atmospheric pollutant arising from coal combustion. When these persistent ubiquitous substances were excluded from the EPA analysis, the number of surface water bodies failing chemical status fell to just 9%.

4.4.1 Groundwater

The majority of groundwater bodies (470 or 92%) were reported as having Good chemical status. The remaining groundwaters (44) were reported as having Poor chemical status, mainly due to historic contamination from industrial and waste sources. The main substances causing failure include nitrate, ammonia, chlorinated solvents, metals and hydrocarbons. Use of herbicides also remains widespread in Ireland, which can be present in groundwaters.

Almost all groundwater bodies (99%) also have Good quantitative status, i.e. rainfall replenishment is generally able to sustainably support the volumes being abstracted for drinking water. Just two groundwater bodies failed to meet quantitative status.

4.5 Existing Threats and Pressures to EU Protected Habitats and Species

Under Article 17 of the Habitats Directive, Member States are obliged to identify threats and pressures to QIs/SCIs using a standard set of criteria. A threat is defined as an "*Activity expected to have an impact on a species/habitat type in the future*" and a pressure is defined as an "*Activity impacting a species/habitat type during the reporting cycle*".

Threats and pressures considered to be most relevantly linked either directly or indirectly to the RBMP were extracted from the full list of threats and pressures. The headline categories considered relevant to the RBMP are presented below, with a more detailed breakdown of the threats and pressures under each headline category presented in **Appendix G.**

- Agriculture;
- Forestry;
- Mining, extraction of materials and energy production;
- Urbanisation, residential and commercial development;
- Biological resource use other than agriculture & forestry;
- Pollution;
- Natural System modifications;
- Natural biotic and abiotic processes (without catastrophes);
- Geological events, natural catastrophes; and

- Climate change.

Under Article 17 of the Habitats Directive, Member States are also obliged to identify threats and pressures to QI/SCI using a standard set of criteria. Threats are defined as "*Factors expected to act in the future after the current reporting period*" within the "*current six-year reporting period*", and pressures are defined as "*Acting now and/or during (any part of or all of) the current reporting period*", within the "*future to reporting periods*."[13]

Threat and pressure categories identified from the most recent Article 17 Report where considered in regard to the RBMP. Examples of potential threats and pressures derived from these categories are detailed in Table **4-2**. Further information regarding the threat and pressure categories is available in the 2019 NPWS Article 17 reporting (Volumes 1 – 3).

Table 4-2: Threat/Pressure Categories, Notes, and Examples (based on NPWS Article 17 Report, 2019)

Threat/Pressure Categories	Notes on Sub-categories	Example Threat/Pressure with Regard to the draft RBMP
Agriculture	Includes land conversion, grazing, abandonment, burning, enrichment, drainage and associated pollution	Pollution impacts from agri-sources on surface water, soil and biodiversity. Farmyard runoff, nutrient enrichment, ecologically unsuitable grazing regimes, invasive species spread, land reclamation.
Forestry	Includes land conversion, grazing, forestry management practices such as clear felling, removal of dead wood, burning, enrichment, drainage and associated pollution	Pollution impacts from forestry sources on surface water, soil and biodiversity. Acidification, suspended solids release, nutrient enrichment, unsuitable fertiliser/pesticide regimes, land clearance, replanting.
Mining, extraction of materials and energy production	Includes renewable abiotic energy use inclusive of geothermal power, solar, wind and tidal energy production.	Emissions to water from mining/extraction activities, abstractions.
Urbanisation, residential and commercial development	Includes urbanisation, industrialisation, recreation and associated pollution	Habitat loss and disturbance from urban pressure. Nutrient enrichment, hydromorphology changes, pollution from domestic wastewater, spread of invasive species.
Biological resource use other than agriculture & forestry	Includes hunting, poisoning, fishing, aquaculture, pollution arising from aquaculture and removal of terrestrial plants	Pollution of shellfish waters, nutrient enrichment, aquaculture impacts on estuaries, tidal mudflats and sandflats, fisheries bycatch.

[13] Reference Portal for reporting under the Article 17 of the Habitats Directive *Explanatory Notes & Guidelines for the period 2013-2018* http://cdr.eionet.europa.eu/help/habitats_art17. Accessed February 2021.

Threat/Pressure Categories	Notes on Sub-categories	Example Threat/Pressure with Regard to the draft RBMP
Pollution	Includes to surface waters, groundwater, marine water pollution, airborne, soil, excess energy, noise and light	Pollution impacts from pollution sources on waters, air, soil and biodiversity.
Natural System modifications	Includes fires, landfill/land reclamation, removal of sediments, abstractions and siltation	Habitat removal/destruction, changes and pollution. Storage and emissions from wastes.
Natural biotic and abiotic processes (without catastrophes)	Includes erosion, succession, competition and predation	Habitat removal/destruction, changes in population dynamics, changes in hydromorphology.
Geological events, natural catastrophes	Includes storms, floods and fire	Habitat removal/destruction and pollution as a result of flooding.
Climate change	Includes temperature rise, drought, sea level rise and increased precipitation	Habitat destruction/alteration as a result of climate change.

4.6 Relevant Biodiversity Policy

The EPA report, *Ireland's Environment – An Integrated Assessment* (EPA, 2020), identified a number of future challenges for national biodiversity, many of which are directly relevant to the RBMP including: habitat loss due to land use changes as the economy improves, climate change and associated potential change in the range of some habitats/ species and the expansion of invasive species. The report also identified the need to develop biodiversity initiatives to engage society and develop a cohesive approach between regulatory bodies so that biodiversity is a key element in economic and development decisions. The need for robust scientifically based monitoring systems and more detailed mapping are considered vital in protecting nature and biodiversity.

Ireland's 4th National Biodiversity Action Plan (NBAP) was published in 2023. The plan sets the national biodiversity agenda for the period 2023-2030. It acknowledges that the plan is set against a backdrop of unprecedented challenges for nature in Ireland and globally, and includes five key objectives:

1. Adopt a Whole-of-Government, Whole-of-Society Approach to Biodiversity;
2. Meet Urgent Conservation and Restoration Needs;
3. Secure Nature's Contribution to People;
4. Enhance the Evidence Base for Action on Biodiversity; and
5. Strengthen Ireland's Contribution to International Biodiversity Initiatives.

The RBMP has a significant role to play in achieving these five objectives, albeit that the RBMP is only one of a suite of national documents needed to advance these objectives and achieve the targets which have been set at the national level.

Ireland's Prioritised Action Framework was published by the DHLGH in March 2021 and this was based upon the *EU Biodiversity Strategy to 2030*[14] and the 8th Environment Action Programme 2021-2030. The EU Biodiversity Strategy identified a range of actions needed to help improve the status of Ireland's habitats and species. The key priorities of this strategy are outlined as follows:

- Establishing protected areas for at least 30% of land and 30% sea in Europe;
- Stricter protection of EU forests;
- Restoring degraded ecosystems at land and sea across the whole of Europe by:
  - Halting and reversing the decline in pollinators;
  - Increasing organic farming and biodiversity-rich landscape features on agricultural land;
  - Restoring at least 25,000 km of EU rivers to a free-flowing state;
  - Planting 3 billion trees by 2030; and
  - Reducing the use and harmfulness of pesticides by 50% by 2030
- Unlocking €20 billion per year for biodiversity; and
- Making the EU a world leader in addressing the global biodiversity crisis.

Ireland has also developed a Biodiversity Sectoral Climate Adaptation Plan[15]. This plan identified upland habitats, peatlands and coastal habitats as being some of the most vulnerable habitat types to climate change. Spread of invasive species was also noted as a key pressure. The actions and priorities arising from the plan will be important for developing and ensuring resilience in the longer term.

In addition, there is a growing awareness and recognition of importance of ecosystem services supported at policy level. Target 2 of the Convention on Biological Diversity

[14] The EU Biodiversity Strategy to 2030. European Commission, 2011

[15] Ireland's Biodiversity Sectoral Climate Change Adaptation Plan (2019), Department of Culture, Heritage and the Gaeltacht.

(CBD) Strategic Plan 2011-2020 required that: "*By 2020, at the latest, biodiversity values have been integrated into national and local development and poverty reduction strategies and planning processes and are being incorporated into national accounting, as appropriate, and reporting systems*". This is mirrored in the EU Biodiversity Strategy to 2030 (Target 5).

In addition to the evolving national policy base noted above, it is also relevant that a Nature Restoration Law has been proposed by the European Commission. The proposal aims to restore ecosystems, habitats and species across the EU's land and sea areas in order to enable the long-term and sustained recovery of biodiversity; contribute to achieving climate mitigation and adaptation objectives and targets; and to meet international commitments. Proposals include *restoring marine habitats such as seagrass beds or sediment bottoms that deliver significant benefits, including for climate change mitigation, and restoring the habitats of iconic marine species such as dolphins and porpoises, sharks and seabirds, and identifying and removing barriers that prevent the connectivity of surface waters*, both of which will be relevant for the RBMP.

5 Stage 1: Screening for Appropriate Assessment

In order to comply with the requirements of Article 6(3) of the EU Habitats Directive, the process of Screening for AA was undertaken at an early stage in the drafting of the 3rd Cycle RBMP, which is presented in **Appendix A.** The AA Screening assessed the potential for the 3rd Cycle RBMP to result in likely significant effects on any European sites within the Natura 2000 network, either alone or in combination with other plans and projects.

5.1 Screening Conclusion

On completion of the AA Screening, it was concluded that the potential for likely significant effects on European sites could not be ruled out.

Furthermore, it was noted at that time that given the high-level nature of the 3rd Cycle RBMP, mitigation in the form of protection policies would likely be required to prevent adverse impacts on site integrity.

With this in mind, the AA process then proceeded to the preparation of a NIS to inform the AA to be undertaken by NPWS prior to finalisation of the RBMP.

6 Stage 2: Appropriate Assessment

6.1 Introduction

This chapter records the assessment of the draft 3rd RBMP [27th September 2021].

The assessment considers the potential impacts[16] that implementation of the draft RBMP could have on the integrity of any European sites, with respect to the conservation objectives, their structure and function. EC guidance states that the integrity of a site involves its ecological functions and the decision as to whether it is adversely affected should focus on, and be limited to, the site's conservation objectives. As noted earlier in this NIS, in the absence of geographic specificity within the draft plan and given the strategic nature of the draft plan, the focus has been on the broad intention of conservation objectives more so than site-specific conservation objectives. The addition of detail at lower planning tiers will be necessary to apply site-specific conservation objectives to any effect.

However, following consultation with relevant stakeholders, the plan has been updated to reflect the addition of four pilot projects within the remit of hydromorphology, for which additional assessment is required as the locations have been specified. Assessment of these pilot projects is included in Chapter 7, Amendments to the Draft RBMP.

The potential effects have been assessed in the absence of any mitigation measures and also with reference to the precautionary principle. It is noted that the development of the draft RBMP has benefited from an integration of SEA/AA expertise to highlight and address concerns on an ongoing basis as the plan has evolved. This is in line with the Habitats Directive, which promotes a hierarchy beginning with avoidance before considering mitigation and compensatory measures. Through iterative discussion during the preparation of the draft RBMP, avoidance of impacts as a result of implementing the RBMP has therefore been at the forefront of discussions with the DHLGH. It is noted that the draft RBMP is a strategic document, which will be supported by a robust tiering of catchment and subcatchment level plans within the overall integrated catchment management approach being promoted through the draft RBMP. As detail is developed down through the hierarchy, further opportunity for focussed assessment will be required

[16] Impacts considered include direct, indirect, short term, long term, temporary, permanent and cumulative.

to inform decision making at a granularity, which cannot be undertaken at the national scale.

6.2 Approach to Assessment

In line with the relevant guidance, this stage of the Appropriate Assessment consists of three main steps:

- **Impact Prediction:** where the likely impacts of the draft RBMP are examined. A source-pathway-receptor model has been used to assess potential for impact;
- **Assessment of Effects:** where the effects of the draft RBMP are assessed as to whether they have any adverse effects on the integrity of European sites as defined by conservation objectives; and
- **Mitigation Measures:** where mitigation measures are identified to ameliorate any adverse effects on the integrity of any European site.

6.3 Prediction of Effects

As noted in **Chapter 3**, in considering the potential for impacts from implementation of the draft RBMP, a "source–pathway–receptor" approach has been applied. The **source** relates to the actions outlined in the draft RBMP which have the potential to adversely impact European sites. The **pathways** relate to how implementation of the draft RBMP can potentially impact European sites, e.g. impacts to water or air quality, disturbance to soil or species. The **receptor** is any European site(s), potentially including those transboundary sites for which there is a pathway of connectivity as a result of the implementation of the draft RBMP.

6.3.1 Context for Impact Prediction

The development and implementation of the draft RBMP itself is considered to be largely positive in terms of its impacts on the environment as it sets out a strategy for the sustainable management of Irelands waters and how that can be achieved. There are many opportunities for shared benefits in terms of biodiversity, climate and population is particular. However, the draft plan has potential to impact on European sites given the nature of the recommended actions it presents. As the draft plan is focussed at a national strategic level, the potential is not for direct or location impacts but rather indirect impacts arising from the potential for development arising out of the various national recommended

actions. **Section 6.3.2** identifies the main potential ecological impacts that could arise for European sites from the implementation of the draft plan.

6.3.1.1 Linkages Between the Nature Directives and the Water Framework Directive

The linkages between the WFD and the Nature Directives have been outlined in a document published by the European Commission in 2011. The document states:

"*Any Natura 2000 site with water-dependent (ground- and/or surface water) Annex I habitat types or Annex II species under the Habitats Directive or with water-dependent bird species of Annex I or migratory bird species of the Birds Directive, and, where the presence of these species or habitats has been the reason for the designation of that protected areas, has to be considered for inclusion in the register of protected areas under WFD Article 6. These are summarised as "water-dependent Natura 2000 sites*".

"*In order to make Article 4.1(c) on protected areas operational there is a need to identify the water related requirements to achieve favourable conservation status of habitats and species dependent on water*"; the focus therefore is on those habitats and species dependent on water and on the water related requirements.

"*The objectives of the directives are closely related and special attention and coordination is needed where these directives are implemented in the same areas. The measures serving the BHD and the WFD objectives need to be included in the river basin management plans required under Article 13 and should also be included in the management plans of the Natura 2000 sites*."

The WFD does not change what Member States must achieve for the Nature Directives, but it provides a joint framework for the implementation of measures needed by the WFD and nature directives in water-dependent Natura 2000 sites.

6.3.2 Impact Identification

A summary of the main potential ecological impacts that could arise from the implementation of the draft RBMP and the actions arising from it are presented below and are used in the impact prediction.

Habitat Loss and Destruction: Habitat loss or destruction is caused where there is complete removal of a habitat type, for example arising from the development of new infrastructure, which alters the existing habitat. The loss and destruction will result in

knock-on effects on the species dependent on this habitat for whole or part of their life cycle; including QI and SCI species. For example, the provision of infrastructure to support achievement of water quality such as wastewater treatment upgrades can result in habitats loss. Given that there are limited geographically specific measures currently within the draft RBMP, the extent of potential habitat loss and destruction both directly and indirectly will only be identifiable as a result of plans, projects and programmes emerging as a result of the draft RBMP.

Habitat Degradation: Habitat degradation results in the diminishment of habitat quality and a loss of important habitat functions over time. It can arise as a result of a number of sources, e.g. from the introduction of invasive species, toxic contamination from spillages or physical modification or alteration of the environment. Such degradation can occur directly, however indirect downstream impacts and effects can also occur, e.g. where in-stream barriers or constrictions are removed, with knock on effects downstream. Sudden or gradual habitat degradation will result in knock-on effects on the species dependent on the habitat for whole or part of their life cycle; including QI and SCI species. Given that there are limited geographically specific measures currently within the draft RBMP, the extent of potential habitat degradation both directly and indirectly will only be identifiable as a result of plans, projects and programmes emerging as a result of the draft RBMP.

Habitat Rehabilitation / Enhancement: A number of positive effects are anticipated from the implementation of the draft RBMP not least the improvement and / or restoration of habitats. This type of improvement may arise from reduced pressures along riverine corridors as a result of introduction of buffer strips or better control of cattle access to rivers or it may occur due to removal of weirs or other barriers to upstream movement of fish. Given that there are limited geographically specific measures currently within the draft RBMP, the extent of potential habitat rehabilitation both directly and indirectly will only be identifiable as a result of plans, projects and programmes emerging as a result of the draft RBMP.

Habitat / Species Fragmentation: Habitat fragmentation results from the incremental loss and/or degradation of habitat patches within a larger landscape. Fragmentation can occur either through the direct loss of habitat or through the degradation and eventual loss of the habitat over time. Fragmentation can also result from impediments to the natural movements of species and movements associated with climate change. This is relevant

where corridors for movement are disrupted or their functionality for facilitating movement degraded. Habitat loss and destruction are discussed above. In relation to fragmentation, this impact will need further detailed scrutiny as specific plans, projects and programmes emerge as a result of the draft RBMP actions.

Disturbance to Key Species: Disturbance to key species within a European site is likely to increase where there is an increase in the sources of disturbance from developments emerging from draft RBMP. For example, removal of in-stream impediments to fish movement may have indirect impacts for QI habitats and species. Given that there are limited geographically specific measures currently within the draft RBMP, the extent of potential disturbance will only be identifiable as a result of plans, projects and programmes emerging as a result of the draft RBMP.

Changes to Favourable Conservation Status of Key Species: Actions can impact and effect the favourable conservation status of key species both positively or negatively; the impacts inherently linked to changes in habitat; particularly its distribution, abundance, quality, connectivity and management. Actions can affect the reproductive success of the species, which ultimately can lead to population increase, decline or stability. This in turn can affect the distribution and abundance of the species within its geographical range. For instance, the degradation of an estuarine environment due to adverse water quality can impact on the available foraging resource for certain species with a knock-on effect on their ability to survive and reproduce. Given that there are limited geographically specific measures currently within the draft RBMP, the extent of changes will only be identifiable as a result of plans, projects and programmes emerging as a result of the draft RBMP.

Changes in Key Indicators of Conservation Value (Water quality etc.): This is particularly relevant in relation to the draft RBMP and the link in the WFD to protected areas, specifically European sites. While much of the draft RBMP focusses on improvements to water dependant ecosystems, alterations to surface or subsurface water flow as a result of improvements in hydromorphology could result in impact to other related QI or SCI, e.g. otter. Given that there are limited geographically specific measures currently within the draft RBMP, the extent of changes in key indicators will only be identifiable as a result of plans, projects and programmes emerging as a result of the draft RBMP.

Climate Change: Climate change has the potential to alter river flows and levels with direct and indirect effects for QI and SCI which may be dependent on the water body. Changes in concentration of pollutants, availability of suitable habitat for resting, breeding, changes in species dynamics and increased success for invasive species may result from the effects of climate change. In addition, climate change can also effect groundwater dependant terrestrial ecosystems such as fens, petrifying springs, and turloughs as a result of changes to the quantity or quality of the groundwater. This can have direct negative effects on the habitat, which may include QI and also indirect impacts for species dependent on the habitat for whole or part of their life cycle; including QI and SCI species.

In-combination Impacts: A series of individually modest impacts may, 'in-combination', produce a significant impact. The underlying intention of this in-combination provision is to take account of combined impacts, and these will often only occur over time. In that context, one must consider plans or projects which are completed; in preparation; or approved but uncompleted. Where there is a series of small, but potentially adverse impacts occurring within or adjacent to a European site, consideration should be made as to their combined impacts. It is also noted that the combined effect of the Cycle 1-3 measures over time may in combination improve water quality and achieve the objectives of the WFD.

6.3.3 Impact Prediction

In line with the methodology for impact prediction outlined in **Section 3**, the main ecological impacts that could potentially arise from the actions outlined in the draft RBMP are discussed in **Section 0 and 6.5**.

It is acknowledged that the daft RBMP is a high-level Plan and as such prediction of effects at individual European sites is not practical as the draft plan lacks the necessary spatial detail to give context to the extent or significance of any potential effects. As such, the potential for effects is raised within the confines of the draft RBMP with a view to appropriately informing lower levels of planning where the necessary spatial detail is available and identifying the mitigation measures that must be in place for lower tier plans, programmes and projects to ensure the protection of the European sites. It is also noted that any plans, programmes or projects emerging from the delivery of the actions identified within the draft RBMP will themselves be required to conform with the regulatory provision of Strategic Environmental Assessment (SEA), Environmental Impact Assessment (EIA),

Appropriate Assessment (AA), Ecological Impact Assessment (EcIA), environmental risk assessments, and planning regulations/requirements.

6.4 Assessment of Draft RBMP Actions

The following tables assesses the measures contained within the draft 3rd cycle RBMP, in the context of potential for adverse impacts on a European site. Where required mitigation is provided to address any adverse effects identified in the assessment. In addition, recommendations are made to improve the overall coherence of the draft RBMP and ensure opportunities for alignment with the Habitats and Birds Directives is integrated into the plan.

6.4.1 Ireland's River Basin

6.4.1.1 Shared River Basins with NI

Programme of Measures – Shared River Basins with Northern Ireland	Assessment of Effects and Requirement for Mitigation	Additional Recommendations to Improve the Plan
Action 2.2(1): In cooperation with our northern colleagues, DHLGH will prepare a "shared waters" document that will outline the water bodies that flow into or through both jurisdictions and the work to be undertaken to ensure they meet their environmental objectives as reported in the River Basin Management Plans for Ireland and Northern Ireland.	The key activity will be preparation of a document with NI to ensure cooperation for water bodies that flow into or through both jurisdictions. This is considered positive for European sites and their UK equivalent as it will ensure alignment on achieving objectives, both under the WFD and the Nature Directives. **No significant adverse effects** foreseen on European sites, their QIs/SCIs, conservation objectives or site integrity.	N/A

6.4.1.2 What We Want to Achieve

Programme of Measures – Shared River Basins with Northern Ireland	Assessment of Effects and Requirement for Mitigation	Additional Recommendations to Improve the Plan
Action 2.4(1): LAWPRO, in consultation with stakeholders, to produces templates for the catchment management plans that will be put in place for each of the 46 hydrometric catchments.	The key activity will be preparation of templates for catchment management plans for the 46 hydrometric catchments. This is considered broadly positive for European sites as it will provide for better planning at a smaller geographic scale and allow for opportunities for avoidance of impacts and development of mitigation strategies. To ensure the avoidance of negative effects, the templates must: i. Be based on evidence regarding the eco-hydrological requirements of relevant European sites; ii. Integrate the requirement to maintain and restore the favourable conservation status of European site QI habitats and species and SCI species pertinent to the catchment;	N/A

Programme of Measures – Shared River Basins with Northern Ireland	Assessment of Effects and Requirement for Mitigation	Additional Recommendations to Improve the Plan
	including identifying actions to secure the delivering of this requirement with respect to a particular catchment. iii. Contribute to the delivery of the Conservation Objectives of the QI habitats and species and SCI species pertinent to the catchment; including identifying actions which deliver this contribution. iv. Identify activities within the catchment, which prevent or are a threat to delivering (ii) and (iii); the plan identifying the measures and mechanisms required to remove or reduce the threat – including conformance with relevant existing legislation. In addition, as the content of these plans is not yet available, it will be essential that the 46 plans are screened for AA once available.	
Action 2.4(2): Carry out a review of Local Authority Resources to put in place appropriate resources to support individual local authorities in fulfilling their role in water quality protection and restoration	The key activity is a review of resources, which is broadly positive for European sites as it will ensure that the funds and personnel to deliver the measures in the draft RBMP are available. Available resourcing is one of the major risks to implementing the necessary measures to achieve compliance with the WFD objectives in the timeframes proposed. **No significant adverse effects** foreseen on European sites, their QIs/SCIs, conservation objectives or site integrity.	N/A
Action 2.4(3): The Department along with the governance groups (WPAC, NCMC and NTIG) will continually review the progress in the implementation of the programmes of measures and the distance to the 2027 target.	The key activity is continuous review of implementation. This is considered positive as it will allow for progress to be tracked and interventions made if measures are not being delivered. **No significant adverse effects** foreseen on European sites, their QIs/SCIs, conservation objectives or site integrity.	N/A

Programme of Measures – Shared River Basins with Northern Ireland	Assessment of Effects and Requirement for Mitigation	Additional Recommendations to Improve the Plan
Action 2.4(4): Explore the feasibility of establishing a high level interdepartmental group to develop a comprehensive financing strategy to support the implementation of measures to deliver on the ambitious Water, Climate and Biodiversity objectives committed to in the Programme for Government; and Evaluate the options for accessing appropriate EU funding sources for achieving both WFD and protected area objectives.	The key activity is establishing a high-level interdepartmental group to develop a comprehensive financing strategy. **No significant adverse effects** foreseen on European sites, their QIs/SCIs, conservation objectives or site integrity.	N/A
Action 2.4(5): Uisce Éireann ~~Irish Water~~ to review and update their Water Services Strategic Plan that covers a 25 year period of water services management.	The key activity is for Irish Water to review their WSSP. The direction to review a plan would not in itself lead to any effects (no impact pathway); however, to avoid any potential from policies or actions that may be included in the plan, it is essential that the review and update of the WSSP be subject to Appropriate Assessment, especially given that the previous version identified potential for likely significant effects and an NIS was prepared to inform the AA determination.	It is recommended that Uisce Éireann ~~Irish Water~~ review the mitigations from the previous NIS to establish their implementation and effectiveness in order to inform the next plan, which will be required to engage with the AA process. It is further recommended that the WSSP take cognisance of the 46 Catchment Management Plans as soon as they are available, noting the mitigation required under Action 2.4(1) in terms of template content.
Action 2.4(6): The Department, together with the Department of Rural and Community Development, will develop and publish in 2024 a Rural Water Services Strategic Plan for the period 2025 to 2050.	The key activity is to develop and publish a Rural Water Services Strategic Plan. As with the Irish Water plan this will attempt to address provision of efficient modern systems which can service users and protect the environment. The preparation of the plan will cover issues of new and upgraded infrastructure, wastewater discharges etc. These issues have	It is recommended that the RWSSP take cognisance of the 46 Catchment Management Plans as soon as they are available, noting the mitigation

Programme of Measures – Shared River Basins with Northern Ireland	Assessment of Effects and Requirement for Mitigation	Additional Recommendations to Improve the Plan
	the potential to lead to likely significant effects/adverse effects on site integrity depending on the location, sensitivity of the receiving environment, specifically where connectivity occurs with European sites. It is essential that the Rural Water Services Strategic Plan is subject to the AA process.	required under Action 2.4(1) in terms of template content.
Action 2.4(7): Uisce Éireann ~~Irish Water~~ and relevant stakeholders will work together to implement mitigation measures for abstractions determined to be significant pressures through the abstraction licensing process.	The key activity identified is to implement mitigation measures for abstractions determined to be significant pressures through the abstraction licensing process. There is no detail provided on the mitigations or abstractions and as such, there is potential for adverse effects on site integrity if there is connectivity to a European site, its QI or SCI. The second-cycle plan included a commitment to improve controls on abstractions. The preparation for a new legislative framework for the sustainable management of water abstractions is underway and the general scheme of the Water Environment (Abstractions) Bill has been approved by Government. The Bill is currently being drafted. While 1,843 abstractions have been registered by the EPA (as of July 2020), the Bill provides for an authorisation system to control all significant water abstractions in compliance with the Water Framework Directive. The authorisation system will be operated by the EPA. In addition to compliance with the WFD (noting its connection to the Habitats Directive and Birds Directive by way of the register of protected areas) the licensing process will have to separately show compliance with the Art. 6(3) and if necessary 6(4) of the Habitats Directive and as such will need to be supported by an AA process culminating in an AA determination.	N/A

Programme of Measures – Shared River Basins with Northern Ireland	Assessment of Effects and Requirement for Mitigation	Additional Recommendations to Improve the Plan
Action 2.4(8): The need for exemptions will be reviewed as the abstraction licensing process is rolled out.	Abstractions for water supply can impact on water bodies by altering flows; over-abstraction can lead to unsustainable use of the resource, leading to low flows in rivers and impact on groundwater-dependent ecosystems including groundwater-dependent terrestrial ecosystems. Any potential for exemptions shall be informed by the AA process in addition to any other assessment processes relevant to decision making. An exemption which leads to adverse effects on site integrity of any European site, alone or in combination, cannot be granted a license. In such a circumstance, where mitigations are not possible, alternatives and IROPI conditions must be met if the project is to proceed.	N/A
Action 2.4(9): A multiagency group under the NTIG to continue a forum to co-ordinate efforts for implementation of Nature-based Catchment Management.	The key activity is continuation of a forum to co-ordinate efforts for implementation of Nature-based Catchment Management. **No significant adverse effects** foreseen on European sites, their QIs/SCIs, conservation objectives or site integrity.	It is recommended that the membership of the multiagency group under the NTIG shall include a representative from NPWS

6.4.1.3 Other Plans and Programmes

Programme of Measures – Shared River Basins with Northern Ireland	Assessment of Effects and Requirement for Mitigation	Additional Recommendations to Improve the Plan
Action 2.5(1): Strengthening water protection provisions where necessary in relevant sectoral policies. These include water services policy, spatial planning policy, agricultural policy and aquaculture policy.	The key activity will be water protection provisions where necessary in relevant sectoral policies. Strengthening water protection in other inter-related policy is positive. **No significant adverse effects** foreseen on European sites, their QIs/SCIs, conservation objectives or site integrity.	N/A
Action 2.5.(2): Identifying and embedding measures that will deliver multiple policy objectives (e.g. water,	The key activity will be identifying and embedding measures that will deliver multiple policy objectives including biodiversity. There is no	N/A

Programme of Measures – Shared River Basins with Northern Ireland	Assessment of Effects and Requirement for Mitigation	Additional Recommendations to Improve the Plan
biodiversity and climate adaptation/mitigation) into sectoral policies.	information on the measures proposed within the draft RBMP; however, the sectoral policies referenced will be subject to SEA and AA processes when formulated. While positive, it is acknowledged that some measures could result in adverse effects on site integrity, alone or in combination if they compromise achievement of the conservation objectives for the site or they impact on Annex species. The measures shall be subject to the AA process under each sectoral policies/plan prior to their adoption.	

6.4.2 Our Water Resource

6.4.2.1 Current Conditions of Our Waters

Programme of Measures – Shared River Basins with Northern Ireland	Assessment of Effects and Requirement for Mitigation	Additional Recommendations to Improve the Plan
Action 3.1(1): Measures to be put in place to ensure the additional evidence required to determine if water bodies are 'At Risk' can be obtained.	The key activity are measures to ensure additional evidence base. While measures are not specified, this characterisation is essential to identifying appropriate actions to deliver improved water quality, which will have positive impacts for water dependant ecosystems. **No significant adverse effects** foreseen on European sites, their QIs/SCIs, conservation objectives or site integrity.	N/A

6.4.2.2 Artificial and Heavily Modified Water Bodies

Programme of Measures – Shared River Basins with Northern Ireland	Assessment of Effects and Requirement for Mitigation	Additional Recommendations to Improve the Plan

Action 3.3(1): Undertake a technical review and public consultation on the designation of Heavily Modified Water Bodies.	The key activity for this action is a technical review and consultation. **No significant adverse effects** foreseen on European sites, their QIs/SCIs, conservation objectives or site integrity.	N/A

6.4.2.3 Impacts of Climate Change

Programme of Measures – Shared River Basins with Northern Ireland	Assessment of Effects and Requirement for Mitigation	Additional Recommendations to Improve the Plan
Action 3.4(1): To ensure that the actions selected are effective, sustainable and cost efficient under changing conditions, a "climate check" will be required for all measures carried out under this plan.	The key activity for this action is climate change sensitivity analysis for all measures carried out under the plan. Climate change has the potential for a number of effects on European sites, their QI/SCI and site integrity, notably potential to alter river flows and quality and the functioning of water-dependent habitats; which will have direct and indirect effects for QI and SCI which may be dependent on the habitat. There is also potential to impact QI and SCI related to GWDTE through changes in groundwater quantity or quality. Changes in concentration of pollutants, availability of suitable habitat for resting, breeding, changes in species dynamics and increased success for invasive species may result from the effects of climate change. This review itself will be positive, ensuring that the climate change effects relevant to protection of water-dependant European sites can be considered in the context of climate change effects on biodiversity, however the sensitivity analysis must explicitly consider the potential for changes in QI/SCI population ranges and dynamics if adverse effects are to be avoided.	N/A
Action 3.4(2): Update the Climate Adaptation Plan for the Water Quality and Water Infrastructure Sectors	The key activity for this action is to update the Climate Adaptation Plan for the Water Quality and Water Infrastructure Sectors. The direction to update a plan would not in itself lead to any effects (no impact pathway); however, to avoid any potential from policies or actions that may be included in the plan, it is essential that the update of the Climate Adaptation Plan will be subject to Appropriate Assessment process.	N/A

Programme of Measures – Shared River Basins with Northern Ireland	Assessment of Effects and Requirement for Mitigation	Additional Recommendations to Improve the Plan
Action 3.4(3): Examine opportunities in the monitoring programme to improve our understanding of climate change trends.	The key activity for this action relates to opportunities for monitoring. **No significant adverse effects** foreseen on European sites, their QIs/SCIs, conservation objectives or site integrity.	N/A
Action 3.4(4): Support additional research and pilot projects in the area of climate change.	The key activity for this action relates to research and pilot projects relating to climate change. **No significant adverse effects** foreseen on European sites, their QIs/SCIs, conservation objectives or site integrity.	It is recommended that specific research relating to climate change challenges associated with water-dependant European sites (including terrestrial habitats which are groundwater dependant) would greatly increase the knowledge base to inform decisions not only on WFD compliance into the future but also Habitat Directive compliance.

6.4.3 Implementation of Second Cycle Plan

6.4.3.1 Continued Monitoring, Evaluation and Review

Programme of Measures – Shared River Basins with Northern Ireland	Assessment of Effects and Requirement for Mitigation	Additional Recommendations to Improve the Plan
Action 4.3(1): Progress further studies under the ESRI Joint Research Programme on Water.	The key activity for this action relates to further studies under the JPI. **No significant adverse effects** foreseen on European sites, their QIs/SCIs, conservation objectives or site integrity.	N/A

Programme of Measures – Shared River Basins with Northern Ireland	Assessment of Effects and Requirement for Mitigation	Additional Recommendations to Improve the Plan
Action 4.3(2): Review to be undertaken of the Local Authority Waters Programme and Wider Local Authority Structures to inform their evolution and identify the appropriate level of resources and involvement required from the sector to meet WFD objectives.	The key activity for this action relates to resourcing. **No significant adverse effects** foreseen on European sites, their QIs/SCIs, conservation objectives or site integrity.	N/A
Action 4.3(3): DHLGH to review the outcomes of the IPA Governance Research programme on Ireland's water governance arrangements and implement their recommendations were appropriate.	The key activity for this action is to review the outcomes of the IPA Governance Research programme. **No significant adverse effects** foreseen on European sites, their QIs/SCIs, conservation objectives or site integrity.	N/A
Action 4.3(4): Carry out an assessment of the Agricultural Sustainability Support and Advisory Programme (ASSAP) to review, examine, evaluate, comment and report on the rationale, efficiency, effectiveness and sustainability of ASSAP to date, along with recommendations for the future and its role and objectives under the third-cycle plan.	The key activity for this action is an assessment of the Agricultural Sustainability Support and Advisory Programme (ASSAP). **No significant adverse effects** foreseen on European sites, their QIs/SCIs, conservation objectives or site integrity.	N/A

6.4.4 Programme of Measures

6.4.4.1 Protection of Water Bodies

Programme of Measures – Shared River Basins with Northern Ireland	Assessment of Effects and Requirement for Mitigation	Additional Recommendations to Improve the Plan
Protection 1: Working Group to be established under the National Technical Implementation Group to examine the implementation of current legislation	The key activity will be the establishment of a working group to examine implementation of current legislation focussed on water protection. **No**	N/A

governing activities which pose a risk to waters and to identify opportunities to improve compliance with it.	**significant adverse effects** foreseen on European sites, their QIs/SCIs, conservation objectives or site integrity.	

6.4.4.2 Structural / Societal

Programme of Measures – Shared River Basins with Northern Ireland	Assessment of Effects and Requirement for Mitigation	Additional Recommendations to Improve the Plan
Structural / Societal 1: DHLGH to provide clarification on the roles and responsibilities of the various implementation bodies, shifting emphasis from the sharing of information and the provision of updates to a more focused provision of high-level policy direction, monitoring implementation of the plan, and project management.	The key activity will be clarification on governance and responsibilities. This will have positive effects as it will ensure better inter-departmental coordination and cooperation and better oversight of implementation. **No significant adverse effects** foreseen on European sites, their QIs/SCIs, conservation objectives or site integrity.	N/A
Structural / Societal 2: An enhanced programme of formal and scheduled monitoring and reporting of progress in respect of the implementation of the RBMP will be put in place.	The key activity will be an enhanced programme of formal and scheduled monitoring and reporting of progress in respect of the implementation of the RBMP. This is considered positive as it will ensure continued evidence base is gathered and reported in a timely manner which can then feed into decision making. **No significant adverse effects** foreseen on European sites, their QIs/SCIs, conservation objectives or site integrity.	N/A
Structural / Societal 3: Provide a continued emphasis on the full range of the regulatory mix, from awareness and education, through to norms and enforcement, with a review undertaken to ensure there is an appropriate balance in the third cycle to ensure a greater emphasis on compliance assurance activity.	The key activity is continued application of a range of tools to achieve compliance in terms of WFD and RBMP objectives. Noting the alignment of the WFD and the Nature Directives through the Register of Protected Areas and associated objectives applied to that register the measure is considered positive. **No significant adverse effects** foreseen on European sites, their QIs/SCIs, conservation objectives or site integrity.	N/A

Programme of Measures – Shared River Basins with Northern Ireland	Assessment of Effects and Requirement for Mitigation	Additional Recommendations to Improve the Plan
Structural / Societal 4: Specific capacity building programmes of work to be put in place to encourage the transfer of learning and knowledge.	The key activity is a specific capacity building programme of work to encourage the transfer of learning and knowledge. This transfer of learning and knowledge is considered positive for biodiversity. **No significant adverse effects** foreseen on European sites, their QIs/SCIs, conservation objectives or site integrity.	N/A
Structural / Societal 5: Ensure further activation, development and support of local level initiatives (rivers trusts, catchment partnerships).	The key activity relates to activation, development and support of local level initiatives (rivers trusts, catchment partnerships). This is likely to include stakeholder engagement initiatives, improvement to natural flood alleviation, removal of invasive species etc. Broadly all of these initiatives are positive, focussing on community level initiatives started by local people for local rivers. However, there is potential for adverse effects on European sites, their QI/SCI and site integrity where connectivity to these sites and their conservation objectives under the Habitats Directive and Birds Divertive are not recognised and accounted for in local initiatives. Actions could lead to impacts on maintaining and/or restoring the favourable conservation status of QI/SCI, changes in population dynamics, spread of invasive species and reduced ecological connectivity etc. To avoid adverse effects on any European site resulting from local initiatives, the DHLGH will develop a process to ensure that support, funding and coordination of local initiatives undergoes a risk assessment (carried out by LAWPRO or similar) with regard to likely significant effects on any European site, alone or in combination with other plans and projects. The risk assessment will include the requirement to engage with the AA process. Given that this is locally driven, the most appropriate stage at which to undertake risk assessments is at the LAWPRO level where ecological expertise to support communities is in place to undertake the assessments. Assessment will have regard to the Catchment Management Plans (noting the mitigation required in relation to the	N/A

Programme of Measures – Shared River Basins with Northern Ireland	Assessment of Effects and Requirement for Mitigation	Additional Recommendations to Improve the Plan
	content of templates noted under Action 2.4(1). This will ensure a more coordinated approach to local actions. The DHLGH will ensure that there is awareness raising and training associated with any funding or support of initiatives to ensure the potential for effects on any European site are understood more widely.	
Structural / Societal 6: Review the outcomes of the IPA/EPA Governance Research Programme.	The key activity is a review of research. The research collaboration was set up between the EPA and IPA to look at what is termed experimental governance which is a terms used to describe a system of governance that is open to change based on the practical lessons learned through implementation[17]. **No significant adverse effects** foreseen on European sites, their QIs/SCIs, conservation objectives or site integrity.	N/A

6.4.4.3 Implementation / Governance

Programme of Measures – Shared River Basins with Northern Ireland	Assessment of Effects and Requirement for Mitigation	Additional Recommendations to Improve the Plan
Areas for Action 1:.Restoration works to be advanced in 427 areas where environmental objectives are not being met.	Restoration works are likely to include improvement to natural flood alleviation, riparian improvements, replacing hard infrastructure with a non-structural solutions, removals of weirs etc. all with the intention of returning rivers to as close to their natural state as possible. Broadly restoration measures are positive, however, there is potential for adverse effects on European sites, their QI/SCI and site integrity where connectivity to these sites and their conservation objectives under the Habitats Directive and Birds Divertive are not recognised and accounted	N/A
Areas for Action 2: Protection measures to be progressed in 85 areas that are meeting their environmental objectives but require protection to ensure their water quality does not deteriorate.		

[17] Boyle, R., O'Riordan J., O'Leary F., and Shannon L. Using an Experimental Governance Lens to Examine Governance of the River Basin Management Plan for Ireland 2018–2021. EPA Research Report No. 373

Programme of Measures – Shared River Basins with Northern Ireland	Assessment of Effects and Requirement for Mitigation	Additional Recommendations to Improve the Plan
Areas for Action 3: Catchment projects aimed at improving water quality to be advanced in 15 areas **Areas for Action 4:** The Blue Dot Programme to draft a detailed work plan for waters with a High-Status Objective, with a view to them forming part of the proposed local catchment plans.	for in the restoration measures proposed. Actions could lead to impacting on the ability to maintain and restore the favourable conservation status of QI/SCI habitats/species, changes in population dynamics, spread of invasive species and reduced ecological connectivity etc. To avoid adverse effects on any European site resulting from the proposed restoration works, works programmes and projects the DHLGH will develop a process to ensure that support, funding and coordination of such works and projects undergoes a risk assessment (carried out by LAWPRO or similar) with regard to likely significant effects on any European site, alone or in combination with other plans and projects. The risk assessment will include the requirement to engage with the AA process. Given that this is locally driven, the most appropriate stage at which to undertake risk assessments is at the LAWPRO level where ecological expertise to support communities is in place to undertake the assessments. The DHLGH will ensure that there is awareness raising and training associated with any restoration works, works programmes and projects to ensure the potential for effects on any European site are understood more widely. Assessment will have regard to the Catchment Management Plans (noting the mitigation required in relation to the content of templates noted under Action 2.4(1). This will ensure a more coordinated approach to local actions. All catchment projects shall be subject to the AA process prior to roll out.	

6.4.4.4 Public Participation Measures

Programme of Measures – Shared River Basins with Northern Ireland	Assessment of Effects and Requirement for Mitigation	Additional Recommendations to Improve the Plan
Public Participation 1: Evaluate the outcome of the Resilience Project for Rivers Trusts to inform future community engagement initiatives.	The key activity will be to evaluate the outcome of the Resilience Project for Rivers Trusts to inform future community engagement initiatives. Actions undertaken under the Rivers Trust include locally led agricultural measures in consultation with farmers, locally focussed eradication of invasive species and in-stream works to improve fisheries. The aim and objectives of the Rivers Trusts are aligned with protection and restoration of waterbodies and as such, there is potential for positive effects on connected water-dependant European sites. However, there is potential for adverse effects on European sites, their QI/SCI and site integrity where connectivity to these sites and their conservation objectives under the Habitats Directive and Birds Directive are not recognised and accounted for in local initiatives. Actions could lead to impacts on maintaining and/or restoring the favourable conservation status of QI/SCI, changes in population dynamics, spread of invasive species and reduced ecological connectivity etc. The consequences of the local initiatives must be considered in project planning (including the requirement (or otherwise) for AA for defined plans or projects) to avoid adverse effects from community engagement initiative. To avoid adverse effects on any European site resulting from local initiatives, the DHLGH will develop a process to ensure that support, funding and coordination of local initiatives undergoes a risk assessment (carried out by LAWPRO or similar) with regard to likely significant effects on any European site, alone or in combination with other plans and projects. The risk assessment will include the requirement to engage with the AA process. Given that this is locally driven, the most appropriate stage at which to undertake risk assessments is at the LAWPRO level where ecological expertise to support communities is in place to undertake the assessments.	N/A

Programme of Measures – Shared River Basins with Northern Ireland	Assessment of Effects and Requirement for Mitigation	Additional Recommendations to Improve the Plan
	Assessment will have regard to the Catchment Management Plans (noting the mitigation required in relation to the content of templates noted under Action 2.4(1). This will ensure a more coordinated approach to local actions. The DHLGH will ensure that there is awareness raising and training associated with any funding or support of initiatives to ensure the potential for effects on any European site are understood more widely. All catchment plans or projects shall be subject to the AA process prior to roll out.	
Public Participation 2: Examine ways in which further support can be provided for the formation and capacity building of local forums to help identify and implement measures.	The key activity will be to improve capacity building through the 3rd cycle RBMP. **No significant adverse effects** foreseen on European sites, their QIs/SCIs, conservation objectives or site integrity.	N/A
Public Participation 3: Increase the level of funding under the Community Water Development Fund	The Community Water Development Fund supports communities in progressing water related projects and initiatives, delivering benefits locally whilst also helping to meet the objectives of the River Basin Management Plan for Ireland and the wider EU Water Framework Directive. Types of projects considered for funding will include: Capital projects such as restoration/habitat conservation/natural flood mitigation measures; fish passage projects; invasive species control, etc. Projects that promote public awareness/education and events such as biodiversity days, surveys, training workshops, surveys and plans, water conservation initiatives; Citizen Science, etc. General amenity such as beach clean, improving amenity areas, bird-watching facilities, etc.	N/A

Programme of Measures – Shared River Basins with Northern Ireland	Assessment of Effects and Requirement for Mitigation	Additional Recommendations to Improve the Plan
	The types of projects proposed are intended to improve water quality and help achieve objectives under the WFD. However, there is potential for adverse effects on European sites, their QI/SCI and site integrity where connectivity to these sites and their conservation objectives under the Habitats Directive and Birds Divertive are not recognised and accounted for in local initiatives. Actions could lead to impacts on maintaining and/or restoring the favourable conservation status of QI/SCI, changes in population dynamics, spread of invasive species and reduced ecological connectivity etc. There is also potential for cumulative effects on SCI and QI, which may interact within a larger European site, which is subject to a number of discrete funding applications. As such, there is potential for adverse effects on site integrity, alone and in combination with other plans and projects if left unmitigated. The consequences must be considered in project planning (including the requirement (or otherwise) for AA for defined plans or projects) to avoid adverse effects from community engagement initiative. To avoid adverse effects on any European site resulting from local initiatives, the DHLGH will develop a process to ensure that support, funding and coordination of local initiatives undergoes a risk assessment (carried out by LAWPRO or similar) with regard to likely significant effects on any European site, alone or in combination with other plans and projects. The risk assessment will include the requirement to engage with the AA process. Given that this is locally driven, the most appropriate stage at which to undertake risk assessments is at the LAWPRO level where ecological expertise to support communities is in place to undertake the assessments. Assessment will have regard to the Catchment Management Plans (noting the mitigation required in relation to the content of templates	

Programme of Measures – Shared River Basins with Northern Ireland	Assessment of Effects and Requirement for Mitigation	Additional Recommendations to Improve the Plan
	noted under Action 2.4(1). This will ensure a more coordinated approach to local actions. The DHLGH will ensure that there is awareness raising and training associated with any funding or support of initiatives to ensure the potential for effects on any European site are understood more widely. All catchment plans or projects shall be subject to the AA process prior to roll out.	
Public Participation 4: Explore opportunities for the development of a national citizen science programme	The key activity will be to provide supports for the development of a National Citizen Science Programme for the monitoring of water quality over the 3rd cycle RBMP. There is no detail in relation to the proposed supports. It is noted that while such monitoring offers benefits in terms of understanding trends and status of water bodies over a wider geographic scale than might be possible with formal monitoring, there is potential for indirect negative effects on European sites if the planning does not consider potential to disturb such sites and their QI/SCI, particularly during breeding seasons resulting in adverse effects on European sits, their QIs/SCIs, conservation objectives or site integrity. The DHLGH will ensure that there is awareness raising and if necessary training associated with any funding or support of initiatives to ensure the potential for effects on any European site are understood more widely. This should include the development of risk assessment templates by LAWPRO or similar for use in the programme. The national citizen science programme will link to the Catchment Management Plans (noting the mitigation required in relation to the content of templates noted under Action 2.4(1). This will ensure a more coordinated approach to local actions.	N/A

Programme of Measures – Shared River Basins with Northern Ireland	Assessment of Effects and Requirement for Mitigation	Additional Recommendations to Improve the Plan
Public Participation 5: An Fóram Uisce to identify the optimum level of engagement with the implementation structures for the WFD as part of their strategic planning process.	The key activity will be to review An Fóram Uisce. **No significant adverse effects** foreseen on European sites, their QIs/SCIs, conservation objectives or site integrity.	N/A

6.4.5 Environmental Measures

6.4.5.1 Agriculture Measures

Programme of Measures – Shared River Basins with Northern Ireland	Assessment of Effects and Requirement for Mitigation	Additional Recommendations to Improve the Plan
Agriculture 1: GAP Regulations - The existing GAP Regulations are due to expire and be replaced at the end of 2021. The Nitrates Expert Group is working on the development of the new Nitrates Action Programme, which will be implemented by the regulations. It is expected that the new NAP will: • Retain the existing controls on Nitrogen and Phosphorous from agriculture. • Implement tighter controls on nitrogen and phosphorus inputs by: ➢ Establishing a chemical fertiliser register for farmers ➢ Providing for enhanced programmes of enforcement. ➢ Stipulating tighter controls on the use of chemical nitrogen fertilisers focussed on critical source areas	Nutrient loses to water remain one of the most significant pressures on water quality nationally with the EPA identifying the two main sources as agriculture and wastewater. The SWMI consultation noted that nutrient loss is most common in freely draining soils, where it leaches readily to groundwater before being discharged into river systems and onwards to estuaries and coastal waters where it causes water quality problems. In the freely draining catchments, nitrate losses are closely correlated with farm intensity: the higher the application of nitrate to land, the higher the nitrate concentrations in waters. Nitrogen (and phosphorus) losses from such catchments will continue to rise unless controlled. These nutrient losses in addition to impacting water quality can also impact on the favourable conservation status of water-dependant European sites. The GAP Regulations are intended to provide the control with regard to nutrients however, the most recent monitoring results from the EPA indicate that trends in terms of nutrient pollution are not going in the right direction, partly as a result of the ongoing expansion of the agriculture sector under Food Wise 2025 and its successor. Noting that this is the 5th NAP in preparation, a business as usual scenario would be expected to give rise to continued negative effects with respect to nutrient losses	N/A

Programme of Measures – Shared River Basins with Northern Ireland	Assessment of Effects and Requirement for Mitigation	Additional Recommendations to Improve the Plan
➢ Incorporate an industry-led initiative to reduce agricultural impacts on water quality.	with potential for adverse effects on water dependant and/or nutrient sensitive SCI and QI. The new NAP is being prepared; however, it is not yet published in draft. There are expectations as to what actions may be included within the new NAP, however these are not confirmed. The actions arising from the new NAP have potential for significant adverse effects on European sites; particularly mindful of nutrient loss to water from agriculture is one of the most significant pressures on water quality in Ireland. The new NAP will be subject to AA and SEA in its own right and the new NAP will be required to be cognisant of the RBMP; including the mitigations identified within this NIS for the RBMP. In the context of nitrates derogations, it is noted that where a farm has a derogation and has an eco-hydrological pathway to a European site, there is potential risk to the favourable conservation status objective of those European sites. The derogations will be decided as part of the NAP process. However, it is estimated that over 5,000 farms within the state would seek to avail of the derogation status, covering significant land areas. The list of farms and/or their location is not available. From a precautionary perspective it is assumed that these some of these farms and their activities have eco-hydrological pathways to European sites and that some of these European sites are within the landholding. Therefore, there is significant potential for adverse effects on maintaining and achieving conservation objectives and therefore integrity of European sites with respect to these derogations both individually and in combination with other derogations, plans and projects. Given the scale of derogations under previous cycles of the NAP, the potential for in-combination effects is significant. It will therefore be vital that any derogations which emerge from the NAP will be subject to AA; which should include a robust assessment of in-combination adverse effects.	

Programme of Measures – Shared River Basins with Northern Ireland	Assessment of Effects and Requirement for Mitigation	Additional Recommendations to Improve the Plan
Agriculture 2: CAP Strategic Plan - New Rural Development Programme Regulations under the National CAP Strategic Plan will underpin the establishment of a new green architecture that aims to deliver and reward positive environmental outcomes, including water, biodiversity and climate mitigation and adaptation objectives.	The CAP Strategic Plan is currently undergoing both SEA and AA. The AA Screening Report concluded that: *Given the strategic nature of the CAP Strategic Plan, its aims to facilitate and support agriculture in Ireland and the existing threats and pressures posed by agricultural activities to the favourable conservation condition of Annex 1 habitats and Annex 2 species for which European Sites are designated and in light of the current uncertainties relating to the specifics of the Plan, it is considered that the Plan has the potential to result in likely significant effects to European Sites, in view of their conservation objectives. As such, a Natura Impact Statement (NIS) is required to inform an Appropriate Assessment of the Plan to be undertaken by the DAFM.* The proposed new RDP Regulations underpinning the green architecture as foreseen under the CAP Strategic Plan will therefore need to take full account of the mitigation measures identified in the NIS being prepared for that Plan (under separate cover). No additional mitigation required under RBMP subject to full implementation of any mitigations identified in the NIS for the CAP plan.	N/A
Agriculture 3: Teagasc will progress the development of a web-based Farm Sustainability Plan that will complement the existing Nutrient Management Planning online tool and support the wider Agricultural Knowledge and Information Systems (AKIS) programme.	The key activity will be the establishment of a web-based Farm Sustainability Plan. This is broadly positive as it builds on existing tools focussed at achieving more sustainable farming practices. Roll out and appropriate training to ensure it is used correctly is essential to its effectiveness. **No significant adverse effects** foreseen on European sites, their QIs/SCIs, conservation objectives or site integrity.	It is recommended that training is provided to ensure the online tool is properly used.
Agriculture 4: Consideration will be given to extending and expanding LAWPRO and ASSAP to support the implementation of the new CAP Strategic Plan. There will be an increased focus on	The main activity is related to provision of additional resources through LAWPRO and ASSAP. As noted above the CAP Strategic Plan will need to take full account of the mitigation measures identified in the NIS being prepared for that Plan (under separate cover). No additional	N/A

Programme of Measures – Shared River Basins with Northern Ireland	Assessment of Effects and Requirement for Mitigation	Additional Recommendations to Improve the Plan
sustainability across the entire farm advisory service (both Teagasc and private advisory services). This may include a role in the preparation of Farm Sustainability Plans.	mitigation required under RBMP subject to full implementation of any mitigations identified in the NIS for the CAP plan.	
Agriculture 5: The development of a new authorisation system for instream engineering works (see new Controlled Activities for the Protection of Waters regime in Section on Hydromorphology) will strengthen controls of land drainage practices and their enforcement.	The main activity will be the development of a new authorisation system for instream engineering works. Instream works have potential to negatively impact on aquatic flora and fauna through deterioration of habitat quality, changes to environmental parameters, direct mortality of species and disturbance or habitats and species. Spread of invasive species is also a potential effect. As the measure relates to an authorisation system, a precautionary approach is being applied to assume it may relate to works directly in or connected to a European site. As such, there is potential for adverse effects on site integrity unless this is taken into account in the authorisation system with potential for adverse effects on site integrity. The new authorisation system shall include requirement for AA prior to authorisation being given; including requirement to implement any mitigation measures identified as part of the AA process. The DHLGH will ensure that there is awareness raising and training associated with instream engineering works to ensure the potential for adverse effects is understood more widely.	
Agriculture 6: Local authorities and the EPA, through the NIECE network, will ensure that compliance assurance (including enforcement) actions for agricultural activities will be further enhanced and ensure that there is an increased targeting of inspections by local authorities based on	The key activity will be increased enforcement and inspections. **No significant adverse effects** foreseen on European sites, their QIs/SCIs, conservation objectives or site integrity.	N/A

Programme of Measures – Shared River Basins with Northern Ireland	Assessment of Effects and Requirement for Mitigation	Additional Recommendations to Improve the Plan
water quality results, critical source areas and the EPA's PIP Maps.		

6.4.5.2 Hydromorphology Measures

Programme of Measures – Shared River Basins with Northern Ireland	Assessment of Effects and Requirement for Mitigation	Additional Recommendations to Improve the Plan
Hydromorph 1: DHLGH to develop a new Controlled Activities for the Protection of Waters regime to address pressures on the physical condition of waters.	A programme is proposed to develop a new Controlled Activities for the Protection of Waters regime. Activities including land drainage can have adverse effects on site integrity, alone and in combination with other plans and projects. The existing body of legislation in the water services and water management sector, governing activities impacting on the physical condition of water, cannot be easily amended to deliver a robust regulatory regime. The existing body of legislation is considered too disparate, complicated, and heavily amended, such that it requires considerable cross-referencing and skill to navigate. Therefore, a new legislation, including the development of a Bill and associated secondary legislation aimed at managing hydro-morphological pressures is proposed. This will also require a number of repeals/amendments to existing pieces of legislation across a number of policy areas. The development of a new legislative regime will not give rise to adverse effects however, the new legislation must formally include the need for protection of European sites, their QI and SCI in decision making and the need for application of the AA process as part of the control regime.	N/A
Hydromorph 2: DHLGH to establish a restoration programme to mitigate the negative impact of past construction in or near water bodies.	Restoration works are likely to include improvement to natural flood alleviation, riparian improvements, replacing hard infrastructure with a non-structural solutions, removals of weirs and de-culverting	N/A

Programme of Measures – Shared River Basins with Northern Ireland	Assessment of Effects and Requirement for Mitigation	Additional Recommendations to Improve the Plan
	watercourse etc. all with the intention of returning rivers to as close to their natural state and function as possible. Broadly restoration measures are positive, however, there is potential for adverse effects on European sites, their QI/SCI and site integrity where connectivity to these sites and their conservation objectives under the Habitats Directive and Birds Divertive are not recognised and accounted for in the restoration measures proposed. Actions could lead for example to disturbance of QI/SCI, changes in population dynamics, spread of invasive species reduced ecological connectivity etc. To avoid this, a risk assessment is needed to inform actions that are to be implemented on the ground. Many will have little or no risk to European sites; however, those that may have an impact will require an AA. The DHLGH will ensure that there is awareness raising and training associated with any funding of initiatives to ensure the potential for adverse effects is understood more widely. Given that specific measures will be decided upon at a more local level the most appropriate stage at which to undertake such assessments is at the LAWPRO level where ecological expertise to support communities is in place to undertake the assessments. Any restoration plans and projects will be subject to the requirement for AA.	
Hydromorph 3: A pilot project will be undertaken for the Annacotty weir in County Limerick to assist with the design and implementation of the national restoration programme.	The intention of the pilot is to provide an opportunity to test a collaborative and ecology-focussed design approach. It will involve a multi-disciplinary panel of experts from the early stages of the decision-making process. The approach will inform similar future mitigation projects undertaken as part of the national restoration programme. The Annacotty Weir is located in the lower reaches of the River Mulkear, Co Limerick, which is part of the Lower River Shannon Special Area of Conservation (SAC). The weir causes fish passage problem affecting	N/A

Programme of Measures – Shared River Basins with Northern Ireland	Assessment of Effects and Requirement for Mitigation	Additional Recommendations to Improve the Plan
	River Lamprey and Sea Lamprey, which are both QIs of this Natura 2000 river. Upstream migration of Atlantic Salmon is impacted by the weir. Improvements in the movement of these fish and in restoring more natural conditions in the river will contribute to achieving favourable conservation status for the Annex species and habitats associated with the Lower Shannon SAC. As such, the pilot project will have benefits at Annacotty and in the context of European sites elsewhere that will be subjects of the national restoration programme. Notwithstanding this, other QI and SCI associated with the lower Shannon have the potential for negative effects if they are not considered in the overall solution. Impacts could arise from spread of invasive species, loss of supporting habitat or features and changes in flow dynamics affecting aquatic biota. Some of the changes will be positive for the overall status of the river but others may result in un-intended consequences. It is essential that all such pilots proposed and the subsequent restoration programme are subject to AA to design solutions and support planning.	
Hydromorph 4: DHLGH to oversee the implementation of the roadmap of actions to improve fish migration in the lower Shannon at the Hydroelectric scheme located around Parteen and Ardnacrusha.	The intention of the measures is to oversee the implementation of the roadmap of actions to improve fish migration in the Lower Shannon in the vicinity of Parteen and Ardnacrusha. The Lower River Shannon is designated as a Special Area of Conservation [site code: 002165] and a Special Protection Area [site code: 004077]. The QIs, SCIs and their Conservation Objectives have been directly referenced at the NPWS website: https://www.npws.ie/protected-sites/sac/002165 https://www.npws.ie/protected-sites/spa/004077	N/A

Programme of Measures – Shared River Basins with Northern Ireland	Assessment of Effects and Requirement for Mitigation	Additional Recommendations to Improve the Plan
	The roadmap of actions is not part of the RBMP. The supporting text in the RBMP notes that a multi-agency steering group was established in 2018 by the then Minister, to prepare recommendations for improvements to fish passage in the lower Shannon catchment and develop a draft roadmap of actions. This roadmap was intended to set out a programme of initial investment measures to improve free passage for fish at Ardnacrusha/Parteen in the short term, while providing the platform for long-term enhancement of the ecology and environment of the Lower Shannon and the environmental sustainability of the Shannon Hydro-Electric Scheme. Notwithstanding the fact that the roadmap of actions is not included in the RBMP, a number of pathways of potential impacts are noted: Increased ecological connectivity as a result of removal of barriers to movement– this will have direct and positive effects on lamprey, salmon and otter in particular with indirect positive impacts for Freshwater Pearl Mussel which rely on Salmon for their life cycle. Altered hydrology leading to changes in sedimentation/erosion – this could result in indirect negative impacts on Otter if couches/holts are affected by the changes. This could also impact negatively on some QI habitats, notably Alluvial forests with alder *Alnus glutinosa* and ash Fraxinus excelsior. Any alteration to the hydrological regime could adversely affect the habitat, which requires periodic flooding to support its favourable conservation status. Increased tourism and recreation – as a consequence of the removal of barriers at these locations, it is anticipated that there will be increased opportunities for tourism and recreation associated with fishing in particular. This has the potential to adversely impact on QI through disturbance e.g. Otters using the riverine area, spread of invasive species through boats or equipment. In-combination effects – the Lower Shannon is the focus of much activity associated with recreation, industry, energy, water supply etc. As	

Programme of Measures – Shared River Basins with Northern Ireland	Assessment of Effects and Requirement for Mitigation	Additional Recommendations to Improve the Plan
	such, any changes proposed to the hydrologic regime need to be modelled in the context of these other pressures to ensure that cumulative effects are understood before any actions are rolled out. The current situation at Parteen and Ardnacrusha reduces ecological connectivity in the Shannon with issues for a number of the QI. Improvements in the movement of lamprey and salmon in particular and restoration of the river to a more natural condition will contribute to achieving favourable conservation status for the species and habitats associated with the Lower Shannon SAC and the River Shannon and River Fergus Estuaries SPA. Notwithstanding this, other QI and SCI associated with the Lower Shannon have the potential for negative effects if they are not considered in the overall solution. The actions once developed shall undergo screening for AA and preparation of an NIS, supported by hydrological modelling if required, to determine if the actions will have adverse effects on any QI/SCI or site integrity and inform the formal determination on AA. All actions proposed will also be informed by ecological impact assessment to ensure no unintended consequences on wider supporting biodiversity.	

6.4.5.3 Forestry

Programme of Measures – Shared River Basins with Northern Ireland	Assessment of Effects and Requirement for Mitigation	Additional Recommendations to Improve the Plan
Forestry 1: Continue to seek improvements to the licence applications process for key forestry activities.	The key activity will be improvements to the licence applications process for key forestry activities. Forestry activities including afforestation and replanting after felling in sensitive areas has the potential to lead to loss/reduction of habitat area, disturbance to key species, habitat fragmentation and reduction in	N/A

Programme of Measures – Shared River Basins with Northern Ireland	Assessment of Effects and Requirement for Mitigation	Additional Recommendations to Improve the Plan
	species density in the absence of mitigation. Species highly sensitive to sedimentation in particular, will be impacted greatest. It is acknowledged that since the publication of the 2nd Cycle RBMP, the assessment by the Department of Agriculture, Food & the Marine (DAFM) of licence applications for key forestry activities including afforestation, forest road construction and tree felling has undergone significant changes resulting from both legal rulings at a European and national level, and outcomes from the Forestry Appeals Committee process. Notwithstanding this, further improvements are required, particularly in relation to consideration and assessment of in-combination effects within catchments and subcatchments, including other forestry activities but also renewable energy, recreation and industry, that may not be visible at the block application level; and proactive management of areas where existing/future forestry are not compatible with the favourable conservation status of habitats and species for which sites have been designated, notably but not limited to Freshwater Pearl Mussel and Hen Harrier. In the absence of this, there is potential for adverse effects on European sites, their QI/SCI and site integrity. DAFM will integrate into their licensing process, a framework for consideration of in-combination effects at the catchment/subcatchment level to better inform AA determinations. DAFM to develop a GIS layer showing key forestry constraints including waterbodies at risk from forestry, high status areas, protected areas under WFD (which includes SAC/SPA) and water dependant ecosystems, all of which are available through the WFD app but may not be known or understood by individual applicants. This type of GIS support can inform forestry applications by avoiding high-risk areas as a starting point. DAFM to develop a risk matrix in relation to forestry impacts on QI/SCI to inform sensitivity analysis.	

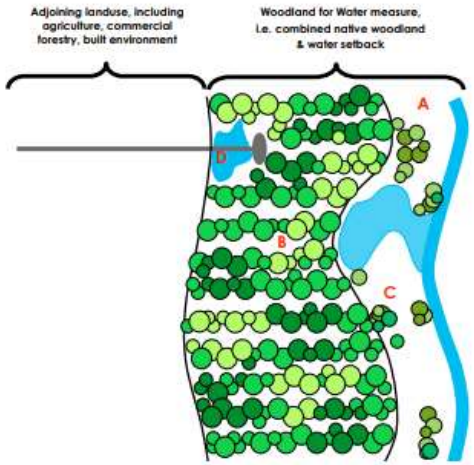
Programme of Measures – Shared River Basins with Northern Ireland	Assessment of Effects and Requirement for Mitigation	Additional Recommendations to Improve the Plan
Forestry 2: Increase the area of forests with appropriate water setbacks through the ongoing restructuring of existing forest stands at clear fell/reforestation stage to incorporate appropriate water setbacks.	The key activity will be an increase in forests with appropriate water setbacks by ensuring restructuring takes place at clear fell/reforestation stage. Planting and harvesting of trees can give rise to potential negative impacts for biodiversity including: release of nutrients/suspended solids to freshwater, estuarine and coastal habitats with direct negative impacts on biodiversity including highly sensitive species such as the Freshwater Pearl Mussel (FPM) and sensitive habitats such as fish spawning and nursery areas; eutrophication leading to deterioration of aquatic habitats; alteration of drainage patterns/water flow, leading to erosion and sedimentation of water bodies; and alteration to existing ecosystem structure and functioning with potential to affect other species such as Hen Harriers which have specific habitat mosaic requirements. This is exacerbated by the need to provide supporting infrastructure such as forestry roads etc. in order to harvest the timber. This infrastructure can also lead to negative impacts on biodiversity as a result of habitat and species disturbance, deterioration of water quality etc. While the measures seeks to replant in a more sustainable manner, it is acknowledged that clear-felling may result in significant adverse effects in the short to medium term for sensitive habitats and species, e.g. clear-felling within a FPM catchment, albeit with the intention of a setback being applied during replanting, may result in long-term permeant adverse effects on the conservation status of that species. A more nuanced approach is required for some habitats and species to ensure they can achieve their Conservation Objectives. This may require specific conservation forestry approaches to aid in the management of certain habitats and species, depending on the location of the forestry. DAFM to identify areas where conservation forestry practices will be required as a response to existing forestry pressures on known QI/SCI effected by historic forestry activity.	N/A

Programme of Measures – Shared River Basins with Northern Ireland	Assessment of Effects and Requirement for Mitigation	Additional Recommendations to Improve the Plan
Forestry 3: Ensure the application of water setbacks and other water-based protection during the creation of new forests, principally under the Afforestation Grant & Premium Scheme.	This measure relates to application of water setbacks and other water-based protection. The other water-based protection is not defined. The water-based protection measures will need to ensure the following: • The creation of new forests will need to be outside European sites; unless the activity is directly connected with or necessary to the management of the European Site for nature conservation; and • The creation of new forests outside of European sites, particularly those whose designated interests are hydrologically dependent, will need to demonstrate no adverse effect on the eco-hydrological function of the European site, which underpins maintaining the favourable conservation status of the site and its associated QIs/SCIs. The Afforestation Grant and Premium Scheme incorporates 12 separate Grant and Premium Categories (GPCs), providing options including productive conifers, broadleaf species, native woodland initiatives as well as agroforestry and forestry-for-fibre options[18]. While a water setback is considered a positive action as it will contribute to positive impacts for biodiversity and water quality, it is noted that the 2nd cycle RBMP more specifically aligned this to also planting of new native woodland to form permanent semi-natural landscape features designed to deliver water-related ecosystem services, such as: reduction in sediment mobilisation and runoff into watercourses, interception of nutrient runoff into watercourses, bank stabilisation, food input into the aquatic ecosystem, shading/cooling, regulation of floodwater and mitigating acidification.	It is recommended that the planting of new native woodland is specifically targeted to ensure that ecosystem services benefits are maximised, particularly for high status sites.
Forestry 4: Manage the application of support measures that have a clear application in relation to	The proposed measure is vague in relation to management of the application of support measures that have a clear application in relation	N/A

[18] https://www.teagasc.ie/crops/forestry/grants/establishment-grants/brief-overview-of-forestry-grant-rates/

Programme of Measures – Shared River Basins with Northern Ireland	Assessment of Effects and Requirement for Mitigation	Additional Recommendations to Improve the Plan
the protection of water, including: the Continuous Cover Forestry Scheme; the native woodland and agri-forestry options under the Afforestation Scheme, and the Native Woodland Conservation Scheme.	to the protection of water. Without further detail on the measures no further assessment is possible. Any applications under these schemes must be subject to AA.	
Forestry 5: Encourage uptake of the recently-revised Woodland Creation on Public Lands Scheme to deliver woodland-based solutions for the protection of drinking water sources and water in general.	The key activity is in relation to encouragement of Public Bodies to plant native woodland on suitable bare sites. Increased native forest cover has potential for positive effects on European sites, their SCI and QI as it will provide additional ecological network opportunities, especially where it can be linked to a wider ecological network. As with any development, consideration is needed of pathways to any European site as part of development consent. It is noted that the application for the scheme clearly states that the process will include AA of the application. **No significant adverse effects** foreseen on European sites, their QIs/SCIs, conservation objectives or site integrity. .	N/A
Forestry 6: Roll-out the Woodland for Water Scheme which is focused on strategically realising native woodland in areas where such features would have a marked impact in relation the protection of water.	The key activity is in relation to roll out of the woodland for water scheme. The figure below, taken from the DAFM publication of the same name[19], sets out the requirement for **A**: a permanent undisturbed water setback, 10-25 m in width (or wider, if required), uncrossed by new drains and largely unplanted. Can be widened at key locations onsite, where site hydrology and slope increase the vulnerability of receiving waters; **B**: New native woodland created under NWS Establishment, 20 m or greater in width and uncrossed by new drains. Can be widened at key locations onsite, where adjoining land use, site hydrology and slope increase the vulnerability of receiving waters;	N/A

[19] https://www.teagasc.ie/media/website/crops/forestry/grants/Woodland-for-Water-April18.pdf

Programme of Measures – Shared River Basins with Northern Ireland	Assessment of Effects and Requirement for Mitigation	Additional Recommendations to Improve the Plan
	C: Setback planting comprising single trees or small groups of suitable native riparian species of trees and shrubs strategically planted & maintained for bank stabilisation, dappled shading and as a food source for aquatic life; and **D**: Possible blocking of existing drains (with silt traps, slow-flow dams) to break existing pathways from source to the receiving watercourse, and to create pocket wetlands and settlement areas  Zones A-C of the Woodland for Water scheme will contribute to permanent semi-natural landscape features designed to deliver water-related ecosystem services, such as: reduction in sediment mobilisation and runoff into watercourses, interception of nutrient runoff into watercourses, bank stabilisation, food input into the aquatic ecosystem, shading / cooling, regulation of floodwater and mitigating acidification. This will have positive long-term effects for European sites which may be currently impacted by forestry activities or have hydrological connectivity with forestry sites.	

Programme of Measures – Shared River Basins with Northern Ireland	Assessment of Effects and Requirement for Mitigation	Additional Recommendations to Improve the Plan
	While the measure seeks to replant in a more sustainable manner, it is acknowledged that clear-felling may result in significant adverse effects in the short to medium term for sensitive habitats and species, e.g. clear-felling within a FPM catchment, albeit with the intention of a setback being applied during replanting, may result in long-term permeant adverse effects on the conservation status of that species. A more nuanced approach is required for some habitats and species to ensure they can achieve their Conservation Objectives. This may require specific conservation forestry approaches to aid in the management of certain habitats and species, depending on the location of the forestry. DAFM to identify areas where conservation forestry practices will be required as a response to existing forestry pressures on known QI/SCI effected by historic forestry activity.	
Forestry 7: Continue to address all forestry-related water incidents, as identified by DAFM Inspectors or reported to DAFM by foresters, water agencies, NGOs and members of the public.	The proposed measure is vague, referring to all forestry-related water incidents. Further transparency is required in relation to this measure and clarity on the processes followed, particularly if such forestry-related water incidents lead to damage to European sites, their QI or SCIs. Notwithstanding that, it is noted that all public authorities are subject to Article 27 of the Birds and Natural Habitats Regulations 2011, as amended. This requires that “any public authority having or exercising functions, including consent functions, which may have implications for or effects on nature conservation shall exercise those functions in compliance with and, as appropriate, so as to secure compliance with, the requirements of the Habitats Directive and the Birds Directive and these Regulations. Furthermore it states that “public authorities, in the exercise of their functions, including consent functions, insofar as the requirements of the Habitats Directive are relevant to those functions, shall take the appropriate steps to avoid, in European Sites, the deterioration of natural habitats and the habitats of species as well as disturbance of the species for which the areas have been designated in	N/A

Programme of Measures – Shared River Basins with Northern Ireland	Assessment of Effects and Requirement for Mitigation	Additional Recommendations to Improve the Plan
	so far as such disturbance could be significant in relation to the objectives of the Habitats Directive." DHLGH, working with DAFM will prepare a clear process for the recording and follow up of any forestry related water-incidents with potential for direct or indirect significant effects/adverse impacts on a European site, its QI or SCI. Initially this will require a risk assessment in relation to pathways for impact and consideration of impacts on achieving conservation objectives. Where effects are identified a co-ordinated response including NPWS, EPA, DAFM and DHLGH will be required.	
Forestry 8: Further engagement between DAFM and other parties on forestry-related issues, both within the existing WFD structures and forums, and bilaterally (e.g. with Inland Fisheries Ireland).	The key activity is in relation to further engagement between DAFM and other parties on forestry-related issues. **No significant adverse effects** foreseen on European sites, their QIs/SCIs, conservation objectives or site integrity.	N/A
Forestry 9: Deliver further training of Registered Foresters and Consultant Ecologists and of Department Forestry Inspectors and Ecologists, in relation to the design, assessment and implementation of forestry projects from the perspective of the protection environment, including water.	The key activity is in relation to deliver further training of Registered Foresters and Consultant Ecologists. **No significant adverse effects** foreseen on European sites, their QIs/SCIs, conservation objectives or site integrity.	N/A

6.4.5.4 Urban Wastewater

Programme of Measures – Shared River Basins with Northern Ireland	Assessment of Effects and Requirement for Mitigation	Additional Recommendations to Improve the Plan
UWW 1: Continue investment in wastewater infrastructure with Uisce Éireann ~~Irish Water~~ investing	The Urban Waste Water Treatment Directive (91/271/EEC) (UWWTD) dictates the requirements for collection, treatment and discharge of	N/A

Programme of Measures – Shared River Basins with Northern Ireland	Assessment of Effects and Requirement for Mitigation	Additional Recommendations to Improve the Plan
in 83 wastewater treatment plants and 10 collection networks at an estimated cost of €1.022bn, over the period 2020-2024.	urban wastewater to a satisfactory standard. The purpose of the Directive is to protect the environment from any negative impacts associated with wastewater. The release of raw or poorly treated sewage can have negative effects on water quality including enrichment. This can cause excessive growth in aquatic flora, which changes the water ecosystem characteristics by reducing light availability, increasing amounts of organic matter and causing an unstable amount of dissolved oxygen. This brings aquatic ecosystem functioning imbalances and leads to eutrophication. The eutrophication mechanism leads to a chain reaction, notably a change in the structure of biological communities and trophic networks, as well as changes in biogeochemical cycles. Such conditions endanger many aquatic fauna, leading in the long-term changes in habitats. Continued investment in waste water infrastructure is considered positive as it reduces the incidence of raw or poorly treated waste water entering lakes, rivers, estuarine or marine waters which may be designated as European sites or have direct or indirect connectivity to such sites, their QI or SCI. As with provision of any infrastructure, there is potential for direct and indirect negative effects on the receiving environment as a result of land use change, destruction of habitat, disturbance or habitats or species and changes in environmental parameters as a result of emissions to water, soil or air. The effects are dependent on the nature of the infrastructure, the sensitivity of the receiving environment and the connectivity to designated sites, their QI or SCI. Wastewater infrastructure is subject to planning and/or licensing of discharges. Both will require AA to inform decision making by the relevant competent authority thereby avoiding and/or mitigating the risk of any adverse effects.	
UWW 2: DHLGH to ensure ongoing engagement with Uisce Éireann ~~Irish Water~~ on the requirements for the next investment period (2025-2029).	The key activity in relation to this measure will be engagement with Irish Water on the requirements for the next investment period. **No**	N/A

Programme of Measures – Shared River Basins with Northern Ireland	Assessment of Effects and Requirement for Mitigation	Additional Recommendations to Improve the Plan
	significant adverse effects foreseen on European sites, their QIs/SCIs, conservation objectives or site integrity.	
UWW 3: EPA to carry out a review of Wastewater Discharge Licences	The key activity in relation to carry out a review of Wastewater Discharge Licenses (WWDLs). **No significant adverse effects** foreseen on European sites, their QIs/SCIs, conservation objectives or site integrity.	It is recommended that the measure also reflect the need to prioritise achieving Habitats Directive objectives and the conservation objectives of individual European sites.
UWW 4: Deliver a multi-annual investment programme to provide wastewater infrastructure for unsewered villages	The key activity will be a funding stream to upgrade and take in charge towns and villages without wastewater networks. According to the EPA State of the Environment Report, raw sewage from 35 towns and villages is released into the environment every day. The majority of this (from 31 of the towns and villages) is discharged directly into estuaries and coastal areas. In addition, Domestic wastewater treatment systems (septic tanks) used by rural householders to treat sewage are also a pressure on water quality. The EPA reported in June 2021 that 54% of systems inspected had failed. The release of raw or poorly treated sewage or inappropriate positioning of septic tanks can lead have negative effects on water quality and in turn impact adversely on European sites where connectivity exists. Nutrient enrichment is one of the key effects. This can cause excessive growth in aquatic flora, which changes the water ecosystem characteristics by reducing light availability, increasing amounts of organic matter and causing an unstable amount of dissolved oxygen. This brings aquatic ecosystem functioning imbalances and leads to eutrophication. The eutrophication mechanism leads to a chain reaction, notably a change in the structure of biological communities and trophic networks, as well as changes in biogeochemical cycles. Such conditions endanger many aquatic fauna, leading in the long-term changes in habitats. The proposed funding in Economic 6 is to address towns and villages without wastewater networks, which will reduce	N/A

Programme of Measures – Shared River Basins with Northern Ireland	Assessment of Effects and Requirement for Mitigation	Additional Recommendations to Improve the Plan
	potential for nutrient enrichment over the medium to long term once improved infrastructure and/or other solutions are provided. Construction and operation of water management infrastructure including upgrades can result in habitats loss or disturbance from site clearance and construction methods, species disturbance from construction and/or operation of infrastructure, emissions to water from water and wastewater treatment processes and abstractions. This can change flow dynamics, nutrient loads, and dispersion rates. This can in turn can lead to in-combination effects with other emissions to the same water body or catchment. As such, investment can lead to direct and indirect negative effects on the receiving environment, including European sites, their QIs/SCIs, conservation objectives or site integrity depending on the nature of the project and the connectivity to any European site. The nature of the upgrades is not available at this point to assess further but all investment decisions must be informed by an AA carried out by the relevant competent authority.	
UWW 5: Uisce Éireann's ~~Irish Water's~~ River Basin Management Plan – Enhanced Ambition Programme to advance priority wastewater treatment plant projects whose discharges have been identified as being significant pressures on water bodies and impacting on WFD objectives.	The key activity in relation to this measure to advance priority waste water treatment plant projects whose discharges have been identified as being significant pressures on water bodies and impacting on WFD objectives. This will have positive effects on biodiversity generally and on European sites with connectivity to the priority projects. Notwithstanding the positive impacts through improved water quality, construction can lead to negative effects on European sites, their QI and SCI through habitat loss and disturbance, species disturbance and changes in environmental quality through emissions to air, water or soil. These projects will require planning and / or licenses which by law will be subject to AA at the site-specific level.	N/A

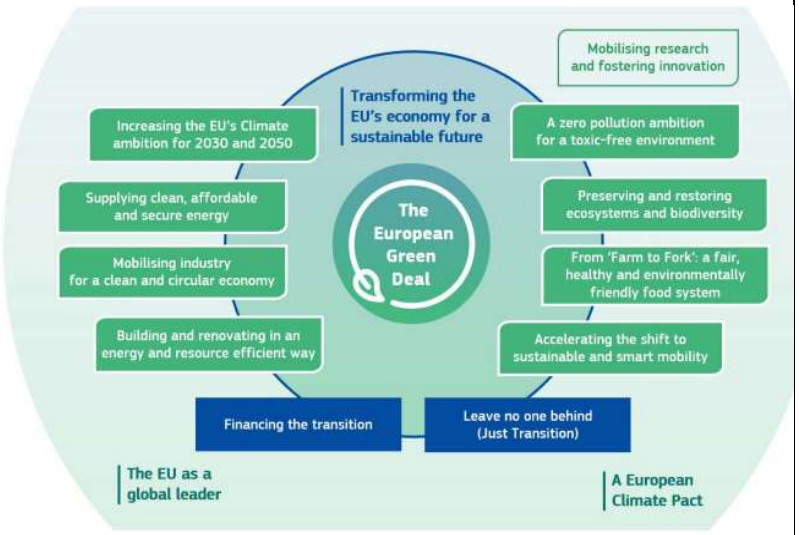
Programme of Measures – Shared River Basins with Northern Ireland	Assessment of Effects and Requirement for Mitigation	Additional Recommendations to Improve the Plan
UWW 6: Complete negotiations and transposition into Irish law of the recast Urban Waste Water Treatment Directive	The key activity in relation to this measure will be new legislation reflecting the renegotiated Urban Waste Water Treatment Directive. **No significant adverse effects** foreseen on European sites, their QIs/SCIs, conservation objectives or site integrity.	N/A
UWW 7 Ensure development of any new standards for Combined Storm Overflows emerging from an update to the Urban Waste Water Treatment Directive.	The key activity in relation to this measure will be development of new standards for Combined Storm Overflows. **No significant adverse effects** foreseen on European sites, their QIs/SCIs, conservation objectives or site integrity.	N/A
UWW 8: Continue to develop and update the Gap Analysis as a tool to deliver environmental benefits for infrastructural planning.	The key activity in relation to this measure will be to develop and update the Gap Analysis as a tool to deliver environmental benefits for infrastructural planning. **No significant adverse effects** foreseen on European sites, their QIs/SCIs, conservation objectives or site integrity.	N/A
UWW 9: Update the Nutrient Sensitive Areas designations under the Urban Waste Water Treatment Directive.	EU member states are required under the Urban Waste Water Treatment Directive (91/271/EEC) to identify nutrient-sensitive areas. These have been defined as “natural freshwater lakes, other freshwater bodies, estuaries and coastal waters which are found to be eutrophic or which in the near future may become eutrophic if protective action is not taken”. The EPA recently carried out a review of nutrient sensitive areas downstream of large urban wastewater discharges, with 76 wastewater discharges identified for assessment. On completion, a total of 66 areas downstream of 51 of these discharges were identified as nutrient sensitive. This is an increase from the previous assessment in 2016, which identified 64 nutrient sensitive areas downstream of 48 discharges. Once a nutrient sensitive area is identified additional nutrient removal must be applied (if not already applied) to wastewater treatment plants discharging to the sensitive area.	N/A

Programme of Measures – Shared River Basins with Northern Ireland	Assessment of Effects and Requirement for Mitigation	Additional Recommendations to Improve the Plan
	The updated nutrient sensitive areas designations will result in an increasing the number of areas that are subject to the requirement for more stringent treatment as laid down in the UWWTD due to nutrient sensitivity. This will have a direct positive impact for water quality, whilst also being positive for biodiversity. However, there is potential for negative impacts in relation to the appropriate siting of new infrastructure. Additional or upgrades to infrastructure may be required which may result in temporary negative impacts to the receiving environment. Proposed works will need to be screened for EIA and AA as a minimum as per normal planning and environmental assessment processes.	

6.4.5.5 Urban Pressures

Programme of Measures – Shared River Basins with Northern Ireland	Assessment of Effects and Requirement for Mitigation	Additional Recommendations to Improve the Plan
Urban Runoff 1: Develop recommendations for an implementation strategy for nature based Sustainable Urban Drainage Systems on a national scale	Nature-based Solutions (NbS) are defined by IUCN[20] as "*actions to protect, sustainably manage, and restore natural or modified ecosystems, that address societal challenges effectively and adaptively, simultaneously providing human well-being and biodiversity benefits*". The approach works with nature rather than trying to control it and offers opportunity for not only for flood risk management but also water quality, biodiversity and climate adaptation and mitigation thus delivering multiple benefits. While much of the recent drive globally in relation to NbS relates to climate adaptation / mitigation, the related concepts such as ecosystem-based adaptation; green infrastructure; climate adaptation services; and landscape restoration among others. In the EU, the Green Deal which plans to make the EU economy more sustainable, has	N/A

[20] https://www.iucn.org/commissions/commission-ecosystem-management/our-work/nature-based-solutions

Programme of Measures – Shared River Basins with Northern Ireland	Assessment of Effects and Requirement for Mitigation	Additional Recommendations to Improve the Plan
	allocated 25% of the budget to climate action, a significant proportion of which will include biodiversity and NbS.[21] As outlined in the below graphic. In Ireland, the Programme for Government recognises many of the issues under the NbS umbrella and has allocated funding to achieving many common objectives.  *The Various elements of the European green Deal (EC, 2019)* The measures proposed in the RBMP under Urban Pressures relate primarily to nature-based Sustainable Urban Drainage Systems (SuDS). The concept of nature-based SuDS is related to the broader NbS concept discussed above. Broadly it takes SuDS, which were introduced in Ireland a number of decades ago in response to flood management and applies NbS thinking.	

[21] http://watersandcommunities.ie/wp-content/uploads/2021/06/2b_Colin-Byrne_NBSUDS-Workshop_.pdf

Programme of Measures – Shared River Basins with Northern Ireland	Assessment of Effects and Requirement for Mitigation	Additional Recommendations to Improve the Plan
	Urban Runoff 1 seeks to develop recommendations for an implementation strategy for nature based Sustainable Urban Drainage Systems on a national scale. This will have indirect positive effects in the long-term for biodiversity as these measures will result in application of NbS concepts in urban planning with indirect benefits arising from reduction in pluvial flood risk, climate resilience, improve nature areas and corridors, opportunities for protection of landscape features. The draft Plan notes that scoping the implementation strategy involves identifying guidance needs, current gaps in technical/operational capacity, appropriate coordination, investment requirements etc. This is a positive step as it recognises that resources, training and funding are all required to support effective implementation of the strategy. This is particularly important given the experiences in relation to SuDS, which was not consistently rolled out in the past. A system to monitor performance should be included in the implementation strategy. The key activity in relation to this measure will be development of technical guidance. **No significant adverse effects** foreseen on European sites, their QIs/SCIs, conservation objectives or site integrity.	
Urban Runoff 2: Provide interim guidance documentation to the Local and Planning Authorities on measures to be implemented to support the delivery of a greater focus on nature based solutions in advance of a national implementation strategy.	The key activity in relation to this measure will be development of technical guidance. **No significant adverse effects** foreseen on European sites, their QIs/SCIs, conservation objectives or site integrity.	It is recommended that for complete clarity, the guidance specifically reference compliance with the EU Habitats and Birds Directives and the need for consideration of both Conservation Objectives for any European sites and related WFD Objectives.
Urban Runoff 3 The National Bathing Water Expert Group to undertake a project to determine the most suitable approach to protecting bathers' health outside of the current bathing season in Dublin Bay.	The key activity in relation to determine the most suitable approach to protecting bathers' health outside of the current bathing season in Dublin Bay. Dublin Bay hosts a number of European site designations relating to marine, estuarine, freshwater and terrestrial habitats and species. Any approach developed to address bathers' health must recognise and	N/A

Programme of Measures – Shared River Basins with Northern Ireland	Assessment of Effects and Requirement for Mitigation	Additional Recommendations to Improve the Plan
	account for these designations, their QI/SCI in the proposed solution. Any approach or project (or any measures arising from the approach or project) will be subject to AA.	
Urban Runoff 4: DHLGH to amend the existing Bathing Water Regulations (S.I. No. 79 of 2008) to provide discretion to local authorities on determining the bathing season for individual bathing waters.	The key activity in relation to amend the existing Bathing Water Regulations (S.I. No. 79 of 2008) to provide discretion to local authorities on determining the bathing season for individual bathing waters. **No significant adverse effects** foreseen on European sites, their QIs/SCIs, conservation objectives or site integrity.	N/A
Urban Runoff 5: Establish a programme for the modelling and monitoring of rainwater run-off and overflows.	The key activity in relation to this measure will be to establish a programme for the modelling and monitoring of rainwater run-off and overflows. **No significant adverse effects** foreseen on European sites, their QIs/SCIs, conservation objectives or site integrity.	N/A
Urban Runoff 6: Oversee the preparation of integrated urban drainage management plans	The key activity in relation to this measure will be to establish a programme for integrated urban drainage management plans. As measures in the plans may have significant effects on a European site, its QI/SCI or site integrity if there is connectivity, it will be essential that all integrated urban drainage management plans will be screened for AA once prepared. The urban drainage management plans will need to contribute positively to achieving, maintaining and restoring the favourable conservation status of European sites and their associated QIs/SCIs for the area covered by the Plan.	N/A

6.4.5.6 Domestic Wastewater Measures

Programme of Measures – Shared River Basins with Northern Ireland	Assessment of Effects and Requirement for Mitigation	Additional Recommendations to Improve the Plan
Domestic Ww 1: In line with the programme for government commitment to 'continue to help fund upgrades to domestic wastewater treatment systems,	Septic tanks are a major cause of diffuse pollution to surface and ground water bodies, particularly in rural areas and are impacting on water quality in rivers, lakes and groundwater particularly in areas of low soil	N/A

Programme of Measures – Shared River Basins with Northern Ireland	Assessment of Effects and Requirement for Mitigation	Additional Recommendations to Improve the Plan
DHLGH will continue to monitor the uptake of the new grant schemes to ensure adequate numbers of people are availing of this measure. A research project will be initiated under the ESRI Research Programme on behaviours and attitudes to assess the level of uptake, impediments to uptake and to make recommendations for improving uptake.	permeability. This is largely due to lack of maintenance of systems. This pollution causes nutrient enrichment of water bodies and contamination of drinking water sources in some cases. Poorly performing or maintained domestic wastewater treatment systems are highlighted as a significant pressure on Ireland's environment (EPA November 2020). This measure relates primarily to funding of upgrades to DWWTS. Upgrade to DWWTS will generally have positive effects for water quality and water dependant ecosystems which are at risk from failing or deteriorating DWWTS and which have connectivity to European sites. This will be particularly the case for high status waters and European sites under the WFD Protected Areas and prioritisation of upgrades in these areas is essential. Where upgrades or new systems are required, there is potential for direct, indirect, construction, operational and cumulative effects on European sites in the absence of mitigation measures. Any consent and/or licensing associated with such upgrades must be subject to AA.	
Domestic Ww 2: A review of the National Inspection Plan (NIP) 2018-2021 to be completed, with the outcome informing the next NIP for the period 2022-2027. An objective of these plans is to prioritise inspections to areas of greatest environmental and public health risk and secure upgrading works where required.	The key activity in relation to this measure will be a review of the National Inspection Plan (NIP) 2018-2021 to inform the next plan period. **No significant adverse effects** foreseen on European sites, their QIs/SCIs, conservation objectives or site integrity.	N/A
Domestic Ww 3: DHLGH to consider the outcomes of the research project into the application of zero discharge nature based solutions and their applicability or not within Ireland's climatic conditions.	The key activity to consider the outcomes of the research project into the application of zero discharge nature based solutions and their applicability or not within Ireland's climatic conditions. **No significant adverse effects** foreseen on European sites, their QIs/SCIs, conservation objectives or site integrity.	N/A
Domestic Ww 4: Review the outcomes of the pilot projects under the first multi-annual Developer-	The key activity in relation to this measure will be a review of the outcomes of the pilot projects under the first multi-annual Developer-	N/A

Programme of Measures – Shared River Basins with Northern Ireland	Assessment of Effects and Requirement for Mitigation	Additional Recommendations to Improve the Plan
Provided Water Services Infrastructure Resolution Programme to inform future policy considerations on resolving sub-standard developer provided infrastructure with sustainable solutions.	Provided Water Services Infrastructure Resolution Programme. **No significant adverse effects** foreseen on European sites, their QIs/SCIs, conservation objectives or site integrity.	

6.4.5.7 Unknown

Programme of Measures – Shared River Basins with Northern Ireland	Assessment of Effects and Requirement for Mitigation	Additional Recommendations to Improve the Plan
Unknown 1: The Local Authority Waters Programme will conduct assessments of water bodies with unknown pressures in priority areas for action to identify the significant pressures in these areas with a high level of confidence.	The key activity will be to conduct assessments of water bodies with unknown pressures in priority areas for action. **No significant adverse effects** foreseen on European sites, their QIs/SCIs, conservation objectives or site integrity.	N/A
Unknown 2: Each local authority will conduct assessments of water bodies with unknown pressures (those not within priority areas for action) to identify the significant pressures in these areas with a high level of confidence.	The key activity will be to conduct assessments of water bodies with unknown pressures (those not within priority areas for action). **No significant adverse effects** foreseen on European sites, their QIs/SCIs, conservation objectives or site integrity.	N/A
Unknown 3: The Local Authority Environmental Services National Training Group (LAESNTG) will provide a training programme for catchment assessment and Integrated Catchment Management for the staff of local authorities and all implementing bodies.	The key activity will provide a training programme for catchment assessment and Integrated Catchment Management. **No significant adverse effects** foreseen on European sites, their QIs/SCIs, conservation objectives or site integrity.	N/A

6.4.5.8 Other

Programme of Measures – Shared River Basins with Northern Ireland	Assessment of Effects and Requirement for Mitigation	Additional Recommendations to Improve the Plan
Other 1: Relevant national authorities to ensure full implementation of the existing measures.	The proposed measure is vague in terms of actual actions and responsibilities. Further transparency is required in relation to this measure. The measure should be revised to be specific in action and intent to facilitate oversight. However, notwithstanding that, it is noted that all public authorities are subject to Article 27 of the Birds and Natural Habitats Regulations 2011, as amended. This requires that "any public authority having or exercising functions, including consent functions, which may have implications for or effects on nature conservation shall exercise those functions in compliance with and, as appropriate, so as to secure compliance with, the requirements of the Habitats Directive and the Birds Directive and these Regulations. Furthermore it states that "public authorities, in the exercise of their functions, including consent functions, insofar as the requirements of the Habitats Directive are relevant to those functions, shall take the appropriate steps to avoid, in European Sites, the deterioration of natural habitats and the habitats of species as well as disturbance of the species for which the areas have been designated in so far as such disturbance could be significant in relation to the objectives of the Habitats Directive."	N/A

6.4.5.9 Peat Measures

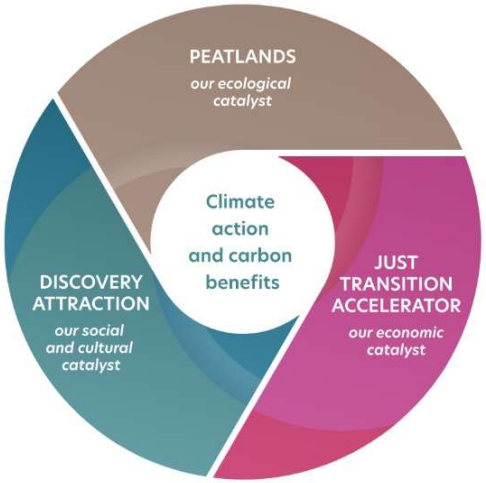
Programme of Measures – Shared River Basins with Northern Ireland	Assessment of Effects and Requirement for Mitigation	Additional Recommendations to Improve the Plan
Peat 1: Measures set out in the National Peatlands Strategy be updated into a new Implementation Plan by NPWS.	There are clear links between peatlands management and water quality as required under the WFD. Run-off from peat harvesting can give rise to increased siltation, turbidity, reduced pH, release of aluminium, ammonia, iron, and mercury with potential to impact on biodiversity as a result.	

Programme of Measures – Shared River Basins with Northern Ireland	Assessment of Effects and Requirement for Mitigation	Additional Recommendations to Improve the Plan
	The key activity for this measure is to update the current peatland strategy and prepare a new Implementation Plan by NPWS. It is noted that both an SEA and AA Screening were carried out on the original Peatland Strategy. The AA Screening Report concluded that "*In view of this core value, and in line with what has been already stated, i.e. that the Strategy sets out generic areas or actions to inform plans and provides that further consideration and review is required at the plan and project stages so as to ensure that all measures taken will meet with the commitment in the Strategy to comply fully with the Habitats Directive, this Strategy has been screened out for appropriate assessment*." Any modifications to the plan or indeed preparation of a new Implementation Plan arising out of the mid-term review must be subject to the AA process.	
Peat 2: NPWS to continue driving implementation of the various programmes to restore the raised bog SAC and NHA network.	The raised bog SAC management plan published in 2017 sets out a roadmap for the long-term management, restoration and conservation of protected raised bogs in Ireland. The plan is part of the measures being implemented in response to the on-going infringement action against Ireland in relation to the implementation of the EU Habitats Directive, with regard to the regulation of turf cutting on the Special Areas of Conservation (SACs) and on foot of the recommendation of Mr. Justice Quirke that a National Raised Bog SAC Management Plan be drawn up. The restoration of the bogs is therefore generally positive for European sites and NHA designated for raised bog. It is acknowledged that some solutions will see continued turf cutting on a more limited scale in SAC bogs, and relocation of turf cutting from SAC to NHA designated bogs. Where continued cutting is to be permitted on SAC bogs despite adverse effects on site integrity, an Article 6(4) derogation will be required to support the permission/licensing. This will require that alternatives have considered which include provisions of alternative fuel sources for example.	N/A

Programme of Measures – Shared River Basins with Northern Ireland	Assessment of Effects and Requirement for Mitigation	Additional Recommendations to Improve the Plan
	Each restoration proposal relating to raised bog SAC will require AA which may in limited cases include consideration of imperative reasons of over-riding public interest where no less damaging alternative can be found.	
Peat 3: Appropriate bodies to implement the actions arising from the CANN and CABB Interreg programmes.	Collaborative Action for the Natura Network (CANN) is a conservation project supported by the INTERREG VA Programme to protect endangered species and restore natural habitats on a cross-border basis (Ireland, Northern Ireland, Scotland). The project includes blanket bog habitat, amongst six other habitats and will also produce seven species action plans and 25 conservation action plans covering over 25,000 ha of SAC land within these countries. Co-operation across Borders for Biodiversity (CABB) is the second conservation project supported by the INTERREG VA Programme. One of the aims of this project is to restore 2,228 ha of blanket bog across three counties in the border region of Ireland. Conservation measures include drain blocking, fencing, adoption of appropriate grazing levels, and the devising of conservation action plans. In Ireland the rewetting project work was completed in February 2021 at Fiddandarry in the Ox Mountains Bogs SAC and successfully installed 2089 peat dams within c. 35 km of drains in deep blanket bog. This effect on water levels and vegetation is being monitored at this site. The key activities relate to the management of European sites for their conservation. **No significant adverse effects** foreseen on European sites, their QIs/SCIs, conservation objectives or site integrity.	N/A
Peat 4: DHLGH to oversee the coordination of the Wild Atlantic Nature LIFE Integrated Project (IP),	The *Wild Atlantic Nature Project is* a 9-year EU-funded LIFE Integrated Project, working with farmers, local communities and landowners to add value to the wide range of services provided from Special Areas of Conservation (SAC) network of blanket bogs and associated areas.	N/A

Programme of Measures – Shared River Basins with Northern Ireland	Assessment of Effects and Requirement for Mitigation	Additional Recommendations to Improve the Plan
bringing together the experience and knowledge of the associated partners.	These peatlands provide clean drinking water, store carbon, support biodiversity, produce high quality food and support resilient rural economies and livelihoods through farming, tourism, recreation and other activities[22]. As part of the overall project, a results-based payment scheme is being trialled on a voluntary basis. This approach links payments to the environmental quality of a farm, with higher nature quality resulting in a higher payment level. The results based approach recognises that management of farmland (including farmyard management, nutrient balance, and condition and management of watercourses) has a direct influence on the quality of habitat. This incentivisation linked to habitat quality will have positive effects on the wider Natura network. The key activities relate to the management of European sites for their conservation. **No significant adverse effects** foreseen on European sites, their QIs/SCIs, conservation objectives or site integrity.	
Peat 5: Bord na Móna to oversee the "Peatlands and People" LIFE Integrated Project.	The *Peatlands and People* project includes three project pillars which, according to the project website include: • Establishment of a network of sites to explore best practices in peatland restoration and rehabilitation, design robust methodologies to monitor and analyse carbon fluxes; • Development of a Just Transition Accelerator programme for innovation to focus on low-carbon and circular economies to support the region economically;	N/A

[22] https://www.wildatlanticnature.ie/

Programme of Measures – Shared River Basins with Northern Ireland	Assessment of Effects and Requirement for Mitigation	Additional Recommendations to Improve the Plan
	• An attraction to introduce the importance of climate action, peatlands, and energy transition more widely. As with the other LIFE project, this one is expected to have direct positive impacts in the medium to long term for biodiversity generally and European sites where peatlands are a QI and those with connectivity, reducing the pressures in the catchments concerned. Specific water quality benefits will include reductions in ammonia, dissolved organic carbon and sediment losses from peatlands. *Source: Wild Atlantic Nature Website*  European sites and other peatlands will benefit from rehabilitation and restoration of bog habitat and improved quality of habitats to support key dependant species. Ecosystem services are also likely to improve with the restoration efforts with positive, and in particular long term, effects from climate, flood mitigation, water filtration etc. The key activities relate to the management of European sites for their conservation. **No significant adverse effects** foreseen on European sites, their QIs/SCIs, conservation objectives or site integrity.	
Peat 6: NPWS and Geological Survey Ireland to fund an investigation into the causes of blanket bog landslides that occurred across Ireland in 2020, and	The key activity will be funding an investigation into the causes of blanket bog landslides that occurred across Ireland in 2020. This follows such high profile events as Meenbog, which suffered a major peat slide in proximity to a site under construction for a windfarm in the area. Such peat slides have significant negative effects for water quality	N/A

Programme of Measures – Shared River Basins with Northern Ireland	Assessment of Effects and Requirement for Mitigation	Additional Recommendations to Improve the Plan
the vulnerability of other at-risk areas to future failures.	and biodiversity including increase suspended solids, decreased light penetration, fish kills and mortality of other aquatic biota. Further evidence base which seeks to understand the specific cause of the peat failures in blanket bog can lead to prevention of future blanket bog land slides and this will have positive long-term indirect effects for water quality and biodiversity. **No significant adverse effects** foreseen on European sites, their QIs/SCIs, conservation objectives or site integrity.	
Peat 7: DAFM to oversee the implementation of sustainable management practises developed through the Blackstairs Mountains, Wicklow Mountains and MacGillycuddy Reeks Mountains EIP projects.	The key activity is the Wild Atlantic Nature LIFE Integrated Project (IP), which aims to improve the conservation status in the Special Areas of Conservation (SAC) Network of blanket bog. The purpose of the Project is therefore directly connected with or necessary to the management of the European sites involved. However, there is nonetheless potential for impacts on other QI/SCI as a result of rehabilitation and restoration activities e.g. where tree felling may be required. AA screening of the specific actions under the Wild Atlantic Nature project will be required to ensure indirect or ex-situ effects are fully considered.	N/A
Peat 8: NPWS to explore peatland financing options to escalate restoration efforts including public private partnerships, community trusts, offsetting etc.	The main activity with this measure is to explore finding options for restoration efforts including public private partnerships, community trusts, offsetting etc. **No significant adverse effects** foreseen on European sites, their QIs/SCIs, conservation objectives or site integrity.	N/A

6.4.5.10 Industry, Mines and Quarries Measures

Programme of Measures – Shared River Basins with Northern Ireland	Assessment of Effects and Requirement for Mitigation	Additional Recommendations to Improve the Plan
IMQ 1: DHLGH will examine opportunities to further support businesses in taking on a water stewardship approach in their operations.	The key activity will be to examine opportunities to further support businesses in taking on a water stewardship approach in their operations. This is broadly positive. **No significant adverse effects** foreseen on European sites, their QIs/SCIs, conservation objectives or site integrity.	N/A
IMQ 2: The EPA will establish a Working Group under the National Technical Implementation Group to examine the implementation of current legislation governing activities which pose a risk to waters and to identify opportunities to improve compliance with it. The focus will be on protecting waterbodies from pressures and activities which are resulting in deterioration of water quality.	The key activity will be the establishment of a group to review the enforcement activities relating to industry, mines and quarry activities with a view to strengthening their performance under the third-cycle plan. This is broadly positive. **No significant adverse effects** foreseen on European sites, their QIs/SCIs, conservation objectives or site integrity.	N/A

6.4.5.11 Drinking Water Measures

Programme of Measures – Shared River Basins with Northern Ireland	Assessment of Effects and Requirement for Mitigation	Additional Recommendations to Improve the Plan
Drinking Water 1: Drinking Water Expert Group to make recommendations to the Minister regarding a new approach to drinking water source protection as part of the transposition of the recast Drinking Water Directive.	A Drinking Water Expert Group has been convened to provide advice to the Minister on the appropriate preparations and steps necessary for the successful transposition and implementation of the new Drinking Water Directive. This Expert Group is chaired by DHLGH with representation from a number of bodies, although it is not clear from the draft plan if this includes NPWS. The Expert Group will make recommendations in relation to the future governance and implementation arrangements including risk based approach for the management of water supply catchments and assignment of responsibilities.	N/A

Programme of Measures – Shared River Basins with Northern Ireland	Assessment of Effects and Requirement for Mitigation	Additional Recommendations to Improve the Plan
	Overall, the long-term impacts will be positive as it will lead to an increase in protection of water sources, thereby reducing the need for water treatment. **No significant adverse effects** foreseen on European sites, their QIs/SCIs, conservation objectives or site integrity.	

6.4.5.12 Invasive Alien Species Measures

Programme of Measures – Shared River Basins with Northern Ireland	Assessment of Effects and Requirement for Mitigation	Additional Recommendations to Improve the Plan
Invasive 1: NPWS to finalise legislation for the implementation of EU Regulation.	Invasive Alien Species has emerged as one of the key challenges facing EU biodiversity as well as presenting serious social and economic challenges. IAS negatively impact Irish biodiversity through competition, herbivory, predation, habitat alteration and introduction of parasites or pathogens and poses a risk to the genetic integrity of our native species. Terrestrial and aquatic habitats can be negatively affected, resulting in severe damage to conservation and economic interests, such as agriculture, fisheries, forestry and various recreational activities. Currently 37 species have been identified across the EU as a high priority for management, nine of these occur in Ireland and include freshwater species such as the Chinese mitten crab (*Eriocheir sinensis*), Curly waterweed (*Lagarosiphon major*), Floating pennywort (*Hydrocotyle ranunculoides*), Parrot's Feather (*Myriophyllum aquaticum*), and Ruddy duck (*Oxyura jamaicensis*). The key activity under this measure is implementation of EU Regulation 1143/2014. The purpose of the Regulations is to address the wide-ranging impacts associated with IAS including impacts to native biodiversity and ecosystem services. According to the EU commission, there is *clear documented evidence of invasive alien species representing a threat for both species and habitats protected by the Nature Directive* and as a result, IAS are treated in a similar way to other threats and pressures documented for European sites under the Birds and Habitats Directives. The implementation of the IAS Regulation *supports Natura 2000 and EU protected species and habitats by*	N/A

Programme of Measures – Shared River Basins with Northern Ireland	Assessment of Effects and Requirement for Mitigation	Additional Recommendations to Improve the Plan
	providing Member States with a dedicated legal tool aimed at preventing the introduction and spread of IAS of Union concern, and at mitigating their impact [23] . Three types of interventions have been identified: prevention, early detection and rapid eradication, and management. This action is anticipated to result in indirect positive long-term impacts for native aquatic, terrestrial and marine biodiversity. **No significant adverse effects** foreseen on European sites, their QIs/SCIs, conservation objectives or site integrity.	
Invasive 2: NPWS to prepare draft management plans and priority pathway actions plans for priority invasive species.	It is intended under this measure to develop plans to specifically address the actions required in terms of prevention, early detection and rapid eradication, and management of the IAS. It is not clear from the measure if the plans will focus on all IAS with potential to reach Ireland or if it is to focus on the nine species already present on the island of Ireland. Particular attention is needed in terms of the additional risk posed in the medium to long-term by climate change which may increase susceptibility for IAS going into the future. Early consideration of this should be part of any prevention strategy. It is noted that the EU regulations do not include some of the most prevalent IAS in Ireland including Japanese knotweed, Himalayan Balsam and Giant Hogweed. Therefore, focussing on only the EU list may not adequately address the issues being experienced in Ireland at the present time. The introduction and spread of IAS has potential to prevent QI and SCI from achieving their favourable conservation status and as such the control and management of IAS will have positive effects in the medium to long-term on European sites. However, management is not without	It is recommended that clarity is provided on what species are to be included.

[23] https://ec.europa.eu/environment/nature/natura2000/management/docs/FAQ_IAS.pdf

Programme of Measures – Shared River Basins with Northern Ireland	Assessment of Effects and Requirement for Mitigation	Additional Recommendations to Improve the Plan
	risk associated with unintended spread, use of chemicals in treatment etc. which has potential for adverse effects. Each management plan must undergo AA process to ensure that the pathways for impact are fully understood and accounted for in any actions.	
Invasive 3: NPWS to advance negotiations on the recruitment of additional Biodiversity Officers.	The key activity will be recruitment of additional resources. **No significant adverse effects** foreseen on European sites, their QIs/SCIs, conservation objectives or site integrity.	N/A
Invasive 4: An additional €500,000 to be provided for projects tackling Invasive Alien Species under the Local Authority Biodiversity Grant Scheme.	The key activity will be funding of projects to tackle IAS. While tackling IAS is broadly positive and will have positive effects for European sites, particularly where they are a pressure on QI/SCI and achieving conservation objectives, there is a risk of direct and indirect negative effects on European sites, their QIs/SCIs, conservation objectives or site integrity from use of chemical treatments, disturbance of protected habitats and species or onward movement IAS. AA screening of projects tackling Invasive Alien Species will be required to ensure these direct, indirect or ex-situ effects are fully considered.	N/A
Invasive 5: DHLGH to provide increased funding to the Community Water Fund to allow for additional projects, including invasive species control projects, to be undertaken at community level.	The key activity will be funding of projects to control IAS. While control of IAS is broadly positive and will have positive effects for European sites, particularly where they are a pressure on QI/SCI, there is a risk of direct and indirect negative effects on European sites, their QIs/SCIs, conservation objectives or site integrity from control activities such as use of chemical treatments, disturbance of protected habitats and species or onward spread of IAS. AA screening of projects tackling control of Invasive Alien Species will be required to ensure these direct, indirect or ex-situ effects are fully considered.	N/A

6.4.5.13 Hazardous Chemicals Measures

Programme of Measures – Shared River Basins with Northern Ireland	Assessment of Effects and Requirement for Mitigation	Additional Recommendations to Improve the Plan
HazChem 1: DHLGH will amend the EQS Regulations to take account of the assessment of River Basin Specific Pollutants (RBSPs) by the National Aquatic Environmental Chemistry Group (NAECG).	The key activity will be amending the EQS Regulations to take account of the assessment of River Basin Specific Pollutants. **No significant adverse effects** foreseen on European sites, their QIs/SCIs, conservation objectives or site integrity.	N/A
HazChem 2: DHLGH and EPA will input into the recently commenced EU work to revise the list of Priority Substances and Priority Hazardous Substances.	The key activity will be input to the recently commenced EU work to revise the list of Priority Substances and Priority Hazardous Substances. **No significant adverse effects** foreseen on European sites, their QIs/SCIs, conservation objectives or site integrity.	N/A
HazChem 3: Follow up scoping study on River Basin Specific Pollutants will be undertaken by the NAECG.	The key activity will be input to carry out a follow up scoping study on River Basin Specific Pollutants. **No significant adverse effects** foreseen on European sites, their QIs/SCIs, conservation objectives or site integrity.	N/A
HazChem 4: The NAECG will oversee a project to develop revised Environmental Quality Standards for the protection of designated shellfish waters.	The key activity will be to oversee a project to develop revised Environmental Quality Standards for the protection of designated shellfish waters. **No significant adverse effects** foreseen on European sites, their QIs/SCIs, conservation objectives or site integrity.	N/A

6.4.5.14 Aquaculture Measures

Programme of Measures – Shared River Basins with Northern Ireland	Assessment of Effects and Requirement for Mitigation	Additional Recommendations to Improve the Plan
Aqua 1: DAFM to seek to improve access to information through the launch of an online mapping viewer of licensed aquaculture sites in Ireland which	The key activity will be launch of an online viewer. This will assist in consideration of in combination effects when undertaking AA screening and preparing NIS to inform decision making in relation to AA. **No**	N/A

will link to licence information already available online.	**significant adverse effects** foreseen on European sites, their QIs/SCIs, conservation objectives or site integrity.	
Aqua 2: DAFM and DHLGH to review opportunities to strengthen the links between the Aquaculture licencing process and the objectives of the WFD.	The key activity will be examining options for strengthening links between aquaculture and WFD. This will assist in consideration of effects when undertaking AA screening and preparing NIS to inform decision making in relation to AA, particularly with regard to shellfish waters. **No significant adverse effects** foreseen on European sites, their QIs/SCIs, conservation objectives or site integrity.	N/A
Aqua 3: DHLGH will seek to implement a new legislative and management framework for shellfish waters in Ireland.	The key activity will be consideration of shellfish waters in WFD characterisation process. This will improve the evidence base on which decision-making, including AA determinations, are made. **No significant adverse effects** foreseen on European sites, their QIs/SCIs, conservation objectives or site integrity.	N/A

6.4.5.15 Land Use and Planning Measures

Programme of Measures – Shared River Basins with Northern Ireland	Assessment of Effects and Requirement for Mitigation	Additional Recommendations to Improve the Plan
Land Use 1: Roll out training on the new water and planning guidance to practitioners.	The key activity will be roll out of training for practitioners. **No significant adverse effects** foreseen on European sites, their QIs/SCIs, conservation objectives or site integrity.	It is recommended that the training specifically addresses the integration of WFD with the Habitats Directive. Specifically, it should address the issues of overlap, potential for conflicting or more onerous objectives under the different pieces of legislation and the differences in “tests” for assessment purposes under both pieces of legislation.

Land Use 2: Progress amendments to the planning and development legislation to give effect to the new guidance.	The key activity will be amendments to the planning and development legislation. **No significant adverse effects** foreseen on European sites, their QIs/SCIs, conservation objectives or site integrity.	It is recommended that the legislation clarifies how the requirements of the Habitats Directive are to be considered and the process where conflicts arise.

6.4.5.16 Economic Measures

Programme of Measures – Shared River Basins with Northern Ireland	Assessment of Effects and Requirement for Mitigation	Additional Recommendations to Improve the Plan
Economic 1: Prior to confirming the final programme of measures, the most cost effective combination of measures will be analysed.	The key activity will be analysis of cost effectiveness of measures. It is acknowledged that the efficient use of funding and resources, as well as assignments across agencies is critical to ensure the measures can be practically implemented over the 3rd WFD Cycle and beyond. It is important that any analysis of cost effectiveness has regard to total whole life cost. It is noted that the legal tests in relation to Appropriate Assessment do not allow for cost / economic as a reason to consent or permit adverse effects on any European site. Proposals must demonstrate that they can be implemented without adverse effects on the integrity of Special Areas of Conservation (SACs) or Special Protection Areas (SPAs), unless there are Imperative Reasons of Overriding Public Interest (IROPI) and no satisfactory alternatives (consistent with Article 6(4) of the Habitats Directive.	N/A
Economic 2: The economic regulator of water services (the CRU) will continue to assess and approve Irish Water's costs and investment plans. This will include assessment of Uisce Éireann's ~~Irish Water's~~ investment decisions to ensure effectiveness, efficiency and economy in Irish Water's expenditure.	The key activity will be for the CRU to assess and approve Uisce Éireann's ~~Irish Water's~~ costs and investment plans. Investment plans will include commitments to upgrade and provide new water management infrastructure. Construction and operation of water management infrastructure can result in habitats loss or disturbance from site clearance and construction methods, species disturbance from	N/A

Programme of Measures – Shared River Basins with Northern Ireland	Assessment of Effects and Requirement for Mitigation	Additional Recommendations to Improve the Plan
The CRU will continue to monitor and report on Irish Water's delivery and performance in that context	construction and/or operation of infrastructure, emissions to water from water and wastewater treatment processes and abstractions. This can change flow dynamics, nutrient loads, and dispersion rates. This can in turn can lead to in-combination effects with other emissions to the same water body or catchment. As such, investment can lead to direct and indirect negative effects on the receiving environment, including European sites, their QIs/SCIs, conservation objectives or site integrity depending on the nature of the project and the connectivity to any European site. Location specific information is not included at this point and will be a feature of the Irish Water investment plans. CRU approvals in relation to investment decisions will need to ensure that AA has been completed by the relevant competent authority as a condition of investment. It is noted that Irish Water has previously applied AA throughout its planning hierarchy to ensure avoidance and mitigation measures can be integrated.	
Economic 3: Uisce Éireann ~~Irish Water~~ to publish a National Water Resources Plan and to maintain national wastewater capacity registers to ensure security of supply and sufficient capacity in drinking and waste water networks to allow for balanced regional development in line with the National Planning Framework.	The key activity will be for Uisce Éireann ~~Irish Water~~ to publish a National Water Resources Plan and to maintain national wastewater capacity registers. Irish Water has prepared NWRP – framework plan and completed an AA determining that it will not result in adverse effects on the integrity of any European site in view of their conservation objectives, either alone or in-combination with other plans their QIs/SCIs, conservation objectives or site integrity. Further more detailed plans are anticipated and IW as the competent authority will need to undertake further AA as more location specific information is included.	N/A
Economic 4: Uisce Éireann ~~Irish Water~~ to continue to implement domestic excess use and non-domestic charging.	The key activity will be for Uisce Éireann ~~Irish Water~~ to continue to implement domestic excess use and non-domestic charging. **No significant adverse effects foreseen on European sites**, their QIs/SCIs, conservation objectives or site integrity.	N/A

Programme of Measures – Shared River Basins with Northern Ireland	Assessment of Effects and Requirement for Mitigation	Additional Recommendations to Improve the Plan
Economic 5: Conduct a new economic assessment of the potential for a natural capital/freshwater ecosystem services approach to protecting water resources, including the need for new economic instruments and protection of freshwater and marine ecosystem services.	The key activity will be a new economic assessment of the potential for a natural capital/freshwater ecosystem services approach to protecting water resources. **No significant adverse effects** foreseen on European sites, their QIs/SCIs, conservation objectives or site integrity.	N/A
Economic 6: Put in place a funding stream to upgrade and take in charge towns and villages without waste water networks.	The key activity will be a funding stream to upgrade and take in charge towns and villages without wastewater networks. According to the EPA State of the Environment Report, raw sewage from 35 towns and villages is released into the environment every day. The majority of this (from 31 of the towns and villages) is discharged directly into estuaries and coastal areas. In addition, Domestic wastewater treatment systems (septic tanks) used by rural householders to treat sewage are also a pressure on water quality. The EPA reported in June 2021 that 54% of systems inspected had failed. The release of raw or poorly treated sewage or inappropriate positioning of septic tanks can lead have negative effects on water quality and in turn impact adversely on European sites where connectivity exists. Nutrient enrichment is one of the key effects. This can cause excessive growth in aquatic flora which changes the water ecosystem characteristics by reducing light availability, increasing amounts of organic matter and causing an unstable amount of dissolved oxygen. This brings aquatic ecosystem functioning imbalances and leads to eutrophication. The eutrophication mechanism leads to a chain reaction, notably a change in the structure of biological communities and trophic networks, as well as changes in biogeochemical cycles. Such conditions endanger many aquatic fauna, leading in the long-term changes in habitats. The proposed funding in Economic 6 is to address towns and villages without wastewater networks which will reduce potential for nutrient enrichment over the medium to long term once improved infrastructure and/or other solutions are provided.	N/A

Programme of Measures – Shared River Basins with Northern Ireland	Assessment of Effects and Requirement for Mitigation	Additional Recommendations to Improve the Plan
	Construction and operation of water management infrastructure including upgrades can result in habitats loss or disturbance from site clearance and construction methods, species disturbance from construction and / or operation of infrastructure, emissions to water from water and wastewater treatment processes and abstractions. This can change flow dynamics, nutrient loads, and dispersion rates. This can in turn can lead to in-combination effects with other emissions to the same waterbody or catchment. As such, investment can lead to direct and indirect negative effects on the receiving environment, including European sites, their QIs/SCIs, conservation objectives or site integrity depending on the nature of the project and the connectivity to any European site. The nature of the upgrades is not available at this point to assess further but all investment decisions must be informed by an AA carried out by the relevant competent authority.	
Economic 7: Finalise the review of rural water services and produce a rural water services strategic plan including a national rural water resources plan for the rural water sector	The key activity will be a review of rural water services and production of a rural water services strategic plan including a national rural water resources plan for the rural water sector. Provision of rural water services will include commitments to upgrade and provide new water management infrastructure. Construction and operation of water management infrastructure can result in habitats loss or disturbance from site clearance and construction methods, species disturbance from construction and / or operation of infrastructure, emissions to water from water and wastewater treatment processes and abstractions. This can change flow dynamics, nutrient loads, and dispersion rates. This can in turn can lead to in-combination effects with other emissions to the same waterbody or catchment. As such, the planning for rural water services can lead to direct and indirect negative effects on the receiving environment, including European sites, their QIs/SCIs, conservation objectives or site integrity depending on the nature of the project and the connectivity to any European site.	N/A

Programme of Measures – Shared River Basins with Northern Ireland	Assessment of Effects and Requirement for Mitigation	Additional Recommendations to Improve the Plan
	The nature of the plans proposed is not available at this point to assess further but as with the Irish Water equivalent plans produced, an AA screening will be required for the plans to establish if they require preparation of an NIS to inform AA determination. The DHLGH will ensure the AA process is applied to the plans prior to their adoption.	

6.5 In Combination Effects

The assessment of in-combination effects with other plans or projects is a crucial and often difficult aspect of Article 6(3) assessment, particularly at the plan level. This step aims to consider the policies within which the RBMP is being developed and to identify at this early stage any possible in-combination effects of the proposed RBMP with other plans and projects; see **Table 6.1** below (which has been updated for the final RBMP). In theory, there are many other plans/projects that interact with or have the potential to combine pressures and threats to European sites; however, the in-combination assessment is a matter of applying a practical and realistic approach.

In line with EC guidance1, a stepwise approach has been taken to consideration of in-combination effects as follows:

- Identify plans/projects that might act in combination;
- Identify the types of impact that might occur;
- Identify pathways for impact; and
- Impact prediction and assessment.

Table 6.1 Assessment of In-combination effects with other plans or projects

RBMP In Combination with…..	Key Types of Impacts	Assessment of Effects
United Nations Sustainable Development Goals (SDGs)	Improved habitat and species protection; Improvements to environmental quality; and Climate resilience.	The key priorities of the SDG are to halt biodiversity loss, protection and improvement of the environment, and enabling the transition to a circular economy. Goal 6 and 14 in particular align with RBMP in terms of clean water and water management, aquatic life, climate action, sustainable cities and communities, as well as education and health. Potential for positive in-combination effects.
8th Environmental Action Programme (EAP) to 2030 [entered into force in May 2022]	Improved habitat and species protection; Improvements to environmental quality; and Climate resilience.	8th Environmental Action Programme to support and build on the environmental aspects of the Green Deal to 2050. It has six priority objectives including: restoring biodiversity and enhancing natural capital/ecosystems; achieving greenhouse gas reduction targets and for the EU to be climate neutral by 2050; enhancing adaptiveness and increasing resiliency to the effects of climate change; decoupling economic growth from resource use and therefore degradation of the environment; aiming for a zero-pollution environment; and reducing pressures on the environment and the climate from consumption/production. The policies of the RBMP are broadly aligned with the actions identified in the Green Deal and would be expected to give rise to positive in combination effects.
EU Green Deal	Improved habitat and species protection; Improvements to environmental quality; and Climate resilience.	The EU Green Deal is an overarching strategy to achieve climate neutrality by 2050. It coordinates actions across key sectors including agriculture, energy, biodiversity, climate and transport. It operates across nine policy areas, three of the key areas of relevance to the 3rd Cycle RBMP being *biodiversity, elimination of pollution* and *climate change.* Various actions have been assigned including the development of the EU Biodiversity Strategy to 2030 and development of a Zero Pollution Action Plan. Potential for positive in-combination effects.
Farm to Fork Strategy	Improved habitat and species protection; Improvements to environmental quality; and	Overarching strategy to achieve food systems that are fair, healthy and environmentally-friendly. The strategy is to ensure that the food chain, covering food production, transport, distribution, marketing and consumption, has a neutral or positive environmental impact, preserving and restoring the land, freshwater and sea-based resources on which the food system depends; helping to mitigate climate change and adapting to its impacts; protecting land, soil, water, air, plant and animal health and welfare; and reversing the loss of biodiversity.

RBMP In Combination with…..	Key Types of Impacts	Assessment of Effects
	Climate resilience.	Potential for positive in-combination effects.
Zero Pollution Action Plan	Improved habitat and species protection; Improvements to environmental quality; and Climate resilience.	The action plan requires among other commitments, that by 2030, the EU should reduce: • by 25% the EU ecosystems where air pollution threatens biodiversity; • by 50% nutrient losses, the use and risk of chemical pesticides, the use of the more hazardous ones, and the sale of antimicrobials for farmed animals and in aquaculture; • by 50% plastic litter at sea and by 30% microplastics released into the environment. The primary purpose of the plan is to improve ecosystem health. Potential for positive in-combination effects with the RBMP.
Common Agricultural Policy	Improved habitat and species protection; Improvements to environmental quality; and Climate resilience. Habitat loss or destruction; Habitat fragmentation or degradation; Disturbance to habitats/species; Alterations to water quality and/or water movement; and	Agriculture poses a significant pressure on water bodies from both point and diffuse pollution caused by impacts such as nutrient loading on the water bodies (namely phosphate, nitrate and ammonia), drainage activities, inappropriate use of fertilisers/pesticides, over- and under-grazing activities, among others. In 2018, the EC launched reforms to the EU Common Agricultural Policy (CAP) to incorporate the sustainable ambitions of the European Green Deal, and particularly the Farm to Fork strategy into the CAP. While the reframing of the CAP to align with the Green Deal has potential for positive in-combination effects with the RBMP, it remains unclear how this will translate on the ground as ambitions also include increased competitiveness. Agriculture remains a significant pressure and in-combination adverse effects cannot be ruled out at this stage if the environmental protection ambitions of the CAP are not fully implemented.

RBMP In Combination with…..	Key Types of Impacts	Assessment of Effects
	Introduction or spread of invasive species.	
European Union Biodiversity Strategy to 2030	Improved habitat and species protection; Reduced disturbance to habitats/species; Improvements to water quality and/or water movement; and Control of spread of invasive species.	The EU's biodiversity strategy for 2030 is intended to be a comprehensive, ambitious and long-term plan to protect nature and reverse the degradation of ecosystems. The strategy aims to put Europe's biodiversity on a path to recovery by 2030 and contains specific actions and commitments. The primary purpose of the strategy is to halt the loss of habitat and species. One target is to increase the contribution of agriculture and forestry to biodiversity, integrating more biodiversity needs into CAP and forest management plans. Opportunities exist in the implementation of the RBMP to assist in achieving the objectives of the strategy through consideration and integration of environmental issues throughout the spatial planning hierarchy. Potential for positive in-combination effects.
National Development Plan 2018-2027 and updates 2021-2030	Habitat loss or destruction; Habitat fragmentation or degradation; Disturbance to habitats/species; Alterations to water quality and/or water movement; and Introduction or spread of invasive species.	The National Development Plan sets out the investment priorities that will underpin the implementation of the National Planning Framework (NPF). This will guide national, regional and local planning and investment decisions in Ireland over the next two decades, to cater for an expected population increase of over 1 million people. The NDP is a high-level budgetary and finance document, which identifies priorities for capital investment but does not confer planning in any way, rather identifies strategic need. Given the nature of the capital investment, the majority of the projects referenced and funded under the NDP have been or will be subject to EIA/AA. A review of the document was prepared and used to inform an updated NDP for the period 2021-2030. A climate and environmental assessment of the NDP measures was also undertaken. The NDP 2021-2030 sets biodiversity as a priority (i.e. Enhanced Amenity and Heritage – National Strategic Outcome 7). Thus, no in-combination effects from the National Development Plan 2021-2030 with the RBMP are predicted.
National Planning Framework (Ireland 2040 Our Plan)	Habitat loss or destruction;	The National Planning Framework is a long-term strategy for the next 20 years focussing on ensuring compatibility between future growth of cities/towns within Ireland alongside environmental sustainability. It is intended that the National Planning Framework will both

RBMP In Combination with…..	Key Types of Impacts	Assessment of Effects
	Habitat fragmentation or degradation; Disturbance to habitats/species; Alterations to water quality and/or water movement; and Introduction or spread of invasive species.	provide the focus to guide and inform future planning and set the framework for integrated investment decisions. It is a policy[24] of the National Planning Framework to ensure the resilience of our natural resources and cultural assets. Linkage to wider policies such as for European sites under the Birds and Habitats Directives and the Water Framework Directive is recognised and the need to set high-level planning policies in protecting and making responsible use of our natural environment. The plan has been subject to AA and includes clear policy on avoidance of impacts to European sites. No potential for in combination effects.
Regional Spatial and Economic Strategies 2020-2032	Habitat loss or destruction; Habitat fragmentation or degradation; Disturbance to habitats/species; Alterations to water quality and/or water movement; and Introduction or spread of invasive species.	The three regional strategies seek to interpret and implement the NPF at a regional level. The RSES includes clear policy and supporting actions to avoid and minimise impacts on European sites. This includes commitments to only implement the policy base within the carrying capacity of the receiving environment as greater detail is known through the planning hierarchy. Based on the RBMP measures and the mitigation proposed in this NIS there is no potential for in-combination effects.
Marine Strategy Framework Directive (2008/56/EC) Programme of Measures (PoMs)	Improved habitat and species protection. Reduced disturbance to habitats/species;	The Marine Strategy Framework Directive (MSFD) has adopted an ecosystem-based approach to protect and manage the marine environment. Ireland has developed a Programme of Measures (PoMs) that will meet targets set in order to achieve or maintain good environmental status. No potential for in-combination effects will result, as the primary purpose of the PoMs is to improve ecological status and includes achievement of objectives of the Habitats and Birds

[24] http://www.housing.gov.ie/sites/default/files/publications/files/towards_a_national_planning_framework_december_2015.pdf , Appendix II – Page 2

RBMP In Combination with…..	Key Types of Impacts	Assessment of Effects
	Improvements to water quality and/or water movement; and Control of spread of invasive species. Habitat loss or destruction.	Directives. All measures included within the PoMs are currently being applied in Ireland under existing directive implementation, e.g. WFD POMs, marine planning and licensing, etc.
National Marine Planning Framework	Improved habitat and species protection. Reduced disturbance to habitats/species; Improvements to water quality and/or water movement; and Control of spread of invasive species.	The NMPF reflects the need for a coherent strategic vision for marine planning in Ireland. The aim of the NMPF is to set a long-term national framework within which government departments and agencies, the regional assemblies and local authorities, as well as wider private sector and community interests, will work together to ensure proper planning and sustainable development and in particular the optimal development of the marine as a whole. The development of the NMPF is a requirement under the Marine Spatial Planning Directive (2014/89/EU). No potential for in-combination effects will result as the framework includes overarching policies for the protection of European sites, their QI/SCI and site integrity.
Climate Action Plan 2023 (Climate Action Plan 2024 currently undergoing public consultation alongside its AA and SEA).	Habitat loss or destruction; Habitat fragmentation or degradation; Species mortality; Disturbance to habitats/species; Alterations to air quality; Alterations to water quality and/or water movement;	The Climate Action Plan 2023 (CAP 2023) is the second annual update to Ireland's Climate Action Plan 2019. The plan is the first to be prepared under the Climate Action and Low Carbon Development (Amendment) Act 2021, and following the introduction, in 2022, of economy-wide carbon budgets and sectoral emissions ceilings. The plan implements the carbon budgets and sectoral emissions ceilings and sets out a roadmap for taking decisive action to halve our emissions by 2030 and reach net-zero emissions by no later than 2050, as committed to in the Programme for Government. Many of the policies are aligned with sectoral plans which include mitigation to avoid adverse effects. The plan lists the actions needed to deliver on climate targets and sets indicative ranges of emissions reductions for each sector of the economy. The plan has clear links between climate and biodiversity and includes a number of specific commitments to address biodiversity loss and restoration, e.g. rewetting of bogs. Further, it aligns with the RBMP by recognising the roles of agriculture, land-use, land-use change, forestry and the marine environment and includes measures to support and move towards

RBMP In Combination with…..	Key Types of Impacts	Assessment of Effects
	Introduction or spread of invasive species; and Climate resilience.	sustainable sectors. The CAP23 is expected to give rise to positive in-combination effects with the RBMP.
National Climate Mitigation Plan 2017	Habitat loss or destruction; Habitat fragmentation or degradation; Alterations to water quality and/or water movement; Disturbance; and Climate resilience.	Plan outlining the measures and actions of four specific sectors to mitigate climate change in the areas of transport, energy, the built environment and agriculture. The plan supports climate change mitigation, particularly with regard to agriculture. Mitigation measures from AA were developed to ensure no adverse effects from the plan. No potential for in-combination effects with the RBMP.
Biodiversity Climate Change Sectoral Adaptation Plan 2019 [prepared under the National Adaptation Framework]	Increased resilience in habitats and species; Improved habitat and species protection; Reduced disturbance to habitats/species; Improvements to water quality and/or water movement; and Control of spread of invasive species.	The National Adaptation Framework provides strategic focus to ensure adaptation measures are taken across different sectors and levels of government to reduce Ireland's vulnerability to the negative impacts of climate change. There is a requirement for each government department to prepare sectoral plans. The DHLGH has completed this in relation to biodiversity. The goal of this plan is to protect biodiversity from the impacts of climate change and to conserve and manage ecosystems so that they deliver services that increase the adaptive capacity of people and biodiversity while also contributing to climate change mitigation. The Biodiversity plan sets out the key challenges for biodiversity and the actions needed to increase resilience of our native flora and fauna to the effects of climate change. The plan[25] identified coastal habitats (fixed dunes – combined with the additional threat of sea-level rise to coastal habitats) as being one of the habitat types most vulnerable to climate change. Spread of invasive species was also noted as a key pressure. The actions and priorities

[25] Irelands Biodiversity Sectoral Climate Change Adaptation Plan, September 2019, DCHG

RBMP In Combination with…..	Key Types of Impacts	Assessment of Effects
		arising from the plan when complete will be important for resilience in the longer term. Positive in combination effects with the RBMP.
Harnessing our Ocean Wealth - an Integrated Marine Plan for Ireland 2012	Habitat loss or destruction; Habitat fragmentation or degradation; Hydromorphological impacts through infrastructure expansion; Alterations to water quality; Disturbance to habitats and/or species; and Introduction or spread of invasive species.	Ireland aims to have the ocean become a key component for economic recovery and sustainable growth. Three high-level goals have been developed: Ireland will utilise market opportunities to improve the maritime economy and create sustainable growth; Improve the health of the sea ecosystems for economic benefit, and goods and services such as food, climate, health and well-being; and Encourage engagement with the sea to increase awareness of its value. There are two key targets: Double the value of our ocean wealth to 2.4% of GDP by 2030; and increase the turnover from our ocean economy to exceed €6.4bn by 2020. This increased productivity and activity proposed in Harnessing our Ocean Wealth is likely to have implications for coastal areas, e.g. impacts to coastal and marine European sites as a result of a greater intensity of development and activity. The RBMP includes a number of aquaculture policies, which address more transparent decision-making. In addition, the Programme for Government 'Our Shared Future' outlines the Government's commitment to "Develop a new integrated marine sustainable development plan, as a successor to Harnessing Our Ocean Wealth, focusing on all aspects of the marine, with a greater focus on sustainability and stakeholder engagement and centrally co-ordinated by the Department of the Taoiseach to be implemented over the life of the Government. The National Marine Planning Framework includes overarching policies for the protection of European sites, their QI/SCI and site integrity, therefore no in-combination effects are anticipated with the RBMP.
National Biodiversity Action Plan (NBAP) 2023-2030	Improved habitat and species protection; Reduced disturbance to habitats/species; Improvements to water quality and/or water movement; and	Ireland has obligations under EU law to protect and conserve biodiversity. This relates to habitats and species both within and outside designated sites. Nationally, Ireland has developed its 4th National Biodiversity Action Plan to address issues and halt the loss of biodiversity, in line with international commitments. The NBAP sets the national biodiversity agenda for the period 2023-2030 and aims to deliver the transformative changes required to the ways in which we value and protect nature. The overall vision in the 3rd National Biodiversity Action Plan (NBAP) was that "*biodiversity and ecosystems in Ireland are conserved and restored, delivering benefits essential for all sectors of society and that Ireland contributes to efforts to halt the loss of biodiversity and the degradation of ecosystems in the EU and globally.*" Building on that vision, the 4th NBAP aims

RBMP In Combination with…..	Key Types of Impacts	Assessment of Effects
	Control of spread of invasive species.	to deliver transformative changes required to the ways in which we value and protect nature, striving for a "whole of government, whole of society" approach to the governance and conservation of biodiversity. The 4th NBAP builds on the previous plan and will continue to implement actions within the framework of five strategic objectives, while addressing new and emerging issues. Objective 2 *Meet Urgent Conservation and Restoration Needs* has the primary aim of acting on the most urgent national conservation and restoration challenges facing Ireland. It specifically addresses the protection and restoration of existing designated areas and species as being crucial to the achievement of this objective. The related targets are: By 2024, enhances implementation of the Habitats and Birds Directives; By 2030, trends in the status of the protected habitats and species under the Habitats and Birds Directives are improving; By 2025, NPWS has reviewed its licensing and consent system to facilitate sustainable activities within Natura 2000 sites; By 2030, in line with the EU Biodiversity Strategy, habitats and species under the Habitats and Birds Directives show no deterioration in conservation trends and status and at least 30% of those not in favourable status will reach that status or show a positive trend; By 2024, Ireland has identified preliminary areas that will be pledged as future protected areas under the EU Biodiversity Strategy; By 2030, deliver management actions for threatened species; and By 2030, NPWS has increased and enhanced its network of National Parks and Nature Reserves. Many of the pressures driving biodiversity loss are in line with the pressures identified by the RBMP, including for example: overgrazing, water and air pollution, alien and problematic species, development, land drainage, urban wastewater, river barriers and modifications of coastal areas. Similarly, there is overlap in protective measures. It is anticipated that there will be positive in-combination effects with the RBMP.
Food Wise 2025	Habitat loss or destruction;	Foodwise 2025 is a ten-year (2016 – 2025) strategy for the development of Ireland's agri-food sector, including seafood production and aquaculture. The strategy outlines the key

RBMP In Combination with…..	Key Types of Impacts	Assessment of Effects
	Habitat fragmentation or degradation; Species mortality; Alterations to water quality and/or water movement; Disturbance to habitats / species; Alterations to air quality; Introduction or spread of invasive species; and Climate resilience.	actions required to ensure that the agri-food sector maximises its contribution to economic growth and exports in an environmentally sustainable manner up to 2025. It identifies significant growth opportunities across all subsectors of the Irish agri-food industry. Growth projection includes increasing the value added in the agri-food, fisheries and wood products sector by 70% to in excess of €13 billion. This plan underwent SEA and AA. The RBMP includes a number of measures to address agriculture, forestry, fisheries etc. and as such, there is potential for in-combination effects if the plans are not aligned. A new plan is being prepared by Government to replace the FW2025 with the intention to improve the focus on sustainability.
Our Rural Future: Rural Development Policy 2021-2025	Habitat loss or destruction; Habitat fragmentation or degradation; Disturbance to habitats/species; Species mortality; Alterations to water quality and/or water movement; Alterations to air quality; and Introduction or spread of invasive species.	Our Rural Future provides a framework for the development of rural Ireland over the next five years. The policy is forward-looking and ambitious and addresses both the challenges facing rural areas and the opportunities which rural economies and communities can benefit from in the coming years. It provides a suite of rural development measures to transition to a climate neutral society to maximise opportunities for rural communities to contribute to meeting national climate targets, including, *inter alia*, smart farming practices. It also includes measures in relation to land use, peatlands and coastal areas. It also addresses supporting the sustainability of agriculture, the marine and forestry including agri-food strategies, the sustainability of farming enterprises, diversification in agriculture and environmental sustainability. Notably this includes continued investment in the agriculture/agri-food sector through a well-funded and strategically aligned Common Agricultural Policy (CAP) which will provide improvements in biodiversity and water quality, along with the transition to carbon neutrality in the agriculture and land-use sector. Measures which align with the RBMP in this regard include: • Development and implementation of a new Agri-Food Strategy to 2030;

RBMP In Combination with…..	Key Types of Impacts	Assessment of Effects
		• Support farm diversification; • Implement Ag-Climatise – A Roadmap towards Climate Neutrality for the agri-food sector; • Pilot a results-based agri-environment scheme to reward farmers for adapting to more sustainable methods of farming with a view to the development of a new agri-environment scheme capable of delivering broad environmental and biodiversity benefits that will align financial supports with climate objectives; • Publish a successor forestry programme to deliver an ambitious afforestation plan to achieve an afforestation target of 8,000 ha/yr, with a particular focus on an increased farmer participation and habitat creation; and • Develop the CAP Strategic Plan for the period 2023-2027. Our Rural Future was subject to its own AA. Mitigation in the plan requires that AA is to be carried out for any projects arising from its implementation. With the required mitigation in the plan, alongside the mitigation in the RBMP, no significant in-combination impacts are predicted.
5th Nitrates Action Programme (NAP) 2022-2025	Habitat degradation; Disturbance to habitats/species; Alterations to water quality and/or water movement; Nutrient enrichment; and Alteration to air quality.	Agriculture is the most 'significant pressure' impacting on Ireland's water bodies. Ireland's Nitrates Action Programme is an important measure for addressing this, through the European Union (Good Agricultural Practice for Protection of Waters) Regulations (S.I. 113 of 2022), gives effect to the Nitrates Directive and the Water Framework Directive. This programme has the objective of reducing water pollution caused or induced by nitrates from agricultural sources and preventing further pollution. The 5th NAP was subject to its own AA, which noted areas of risk in relation to whole farm practices and those close to high status water bodies. Nutrient losses from agriculture have potential to impact on water quality and as such, there is potential for in-combination effects. To address this risk, an interim review of the 5th NAP was undertaken to implement any required additional measures. In addition, a risk-based plan for local authority agricultural inspections and enforcement using water quality information (including EPA PIP maps) to target action has been progressed. The National Agricultural Inspection Programme has also

RBMP In Combination with…..	Key Types of Impacts	Assessment of Effects
		been launched with emphasis on follow-up enforcement, annual reporting and tracking of activity undertaken by the programme.
Shellfish Pollution Reduction Programmes	Disturbance to habitats/species; Alterations to water quality and/or water movement; and Introduction or spread of invasive species.	There are 64 designated shellfish waters in Ireland with 6 PRP prepared on a regional basis. The measures assessed from the PRPs are primarily directed at (1) upgrading of urban waste water systems through actions, such as infrastructural works where required, to ensure discharges meet the relevant water quality standards and (2) investigation and assessment of the extent of pressures to reduce risk. These PRPs have undergone both SEA and AA. The objective is to protect shellfish waters from pollution. Potential for positive in combination effects with the RBMP as associated European sites would benefit from improved water quality.
National Strategic Plan for Sustainable Aquaculture Development 2030	Habitat loss or destruction; Habitat fragmentation or degradation; Disturbance to habitats/species; Alterations to water quality and/or water movement; and Introduction or spread of invasive species.	The plan includes policy areas and actions supporting growth, innovation, knowledge transfer, governance and sustainability. A number of the policies included in the plan would be positive for European sites as they seek to manage activities sustainably with improvements in monitoring, water quality etc. Notwithstanding that, the plan supports significant growth in the sector, and this would likely see intensification and / or expansion of activity. Unless carefully planned this could give rise to significant adverse effects on European sites, particularly as a result of cumulative effects. Potential for in-combination effects.
Afforestation Scheme 2023-2027 and the Forestry Strategy	Habitat loss or destruction; Habitat fragmentation or degradation; Water quality changes; and Disturbance to species.	The Afforestation Scheme 2023-2027 aims to increase the current land area of Ireland under forest cover (11% vs. EU average of 38%) whilst ensuring that these climate resilient and healthy forests are managed according to the principles of sustainable forest management. The new Forest Strategy for Ireland underpins this forestry programme for the period of 2023-2027. The Strategy's overarching objectives are rooted in the three pillars of sustainability – People, Planet and Prosperity. These pillars guide the strategic objectives of the strategy. The Afforestation Scheme aims to contribute towards climate change mitigation, produce commercial timber, provide a sustainable source of roundwood for wood product

RBMP In Combination with…..	Key Types of Impacts	Assessment of Effects
		manufacture, provide biomass for energy production, provide sustainable jobs in the rural economy, increase the area of native forests and purpose-designed recreational and amenity forests, improve water quality through the planting of protective forests and to improve and enhance biodiversity within the newly established forest. This scheme includes a pre-application procedure with a section on environmental considerations. This section is designed to fully align the assessment process with the environmental legislation. They also serve to structure the various checks Registered Foresters are required to undertake in relation to these key sensitivities. DAFM is required to carry out Appropriate Assessment for each proposed afforestation site. It is a legal requirement for all afforestation applications submitted to DAFM. Forestry is not listed as a key threat to protected habitats or annex species but is identified as a pressure on both and is also a recognised pressure for a number of water bodies. The RBMP includes forestry measures to address these pressures. All applications for afforestation approval under the Afforestation Scheme 2023-2027 will undergo an environmental assessment procedure. All applications submitted to DAFM will be subject to AA. Given the pre-application procedure and DAFM AA requirement at project level, no in-combination effects with the RBMP are predicted.
National Peatlands Strategy	Habitat loss or destruction; Habitat fragmentation or degradation; and Alterations to water quality and/or water movement.	The National Peatlands Strategy 2015-2025 was developed to provide a long-term strategy for the management of peatlands for their social, environmental and economic wellbeing. It set out a cross-governmental approach to managing issues that relate to peatlands, including: compliance with relevant national and international environmental legislation, agreements, plans and policies; climate change; forestry; water quality; flood control; energy; nature conservation and restoration; land use planning; and agriculture. Given the actions set out in the strategy, no in-combination effects are predicted.
Water Services Policy Statement 2024-2030	Habitat loss and disturbance from new / upgraded infrastructure; Species disturbance;	The purpose of this Water Services Policy Statement is to build on the work of the previous Policy Statement and reflect the significant changes to the landscape of water services in the last number of years. The Policy Statement was prepared in accordance with the Water Services Acts. This Water Service Policy Statement will contribute to the development of water services policy in the short and medium term through the objectives and priorities established in the statement and it will provide a framework for Uisce Éireann to consolidate

RBMP In Combination with…..	Key Types of Impacts	Assessment of Effects
	Changes to water quality or quantity; and Nutrient enrichment /eutrophication.	and develop public water services through its Strategic Funding Plan. The three key objectives are: availability and reliability; safety and quality; and sustainability. The key underlying principles that inform the development and provision of water services include: • compliance with water-related European Union legislation • delivery of UN Sustainable Development Goal 6 on clean water and sanitation • implementation of the OECD Council Recommendation on Water. Given that this is an overarching statement of policy with a focus on environmental sustainability and compliance with EU legislation, no in-combination effects with the RBMP are predicted.
Water Services Strategic Plan (WSSP, 2015-2040)	Habitat loss and disturbance from new / upgraded infrastructure; Species disturbance; Changes to water quality or quantity; and Nutrient enrichment /eutrophication.	The overarching strategy was subject to Appropriate Assessment and highlighted the need for additional plan/project environmental assessments to be carried out at the tier 2 and tier 3 level. Chapter 6 presents overarching strategies (EN1 to EN3) that aim to protect and enhance the environment. Given the overarching strategies and objectives within the WSSP to protect the environment, and with the implementation of mitigation measures, including project level AA, no in combination effects are predicted.
Uisce Éireann's Capital Investment Plan 2020-2024	Habitat loss and disturbance from new / upgraded infrastructure; Species disturbance; Changes to water quality or quantity; and	The Capital Investment Plan 2020-2024 is Uisce Éireann's 5-year investment plan for water and wastewater assets and infrastructure to 2024. As the national water utility, Uisce Éireann is delivering improvements to water and wastewater services throughout Ireland where they are needed most urgently based on a clearly defined set of priorities. The plan prioritises key outcomes such as reducing leakage, ensuring at-risk water supplies are removed from the EPA's Remedial Action List, dealing with areas where raw sewage is discharged to rivers, lakes and the sea (untreated agglomerations), and addressing areas

RBMP In Combination with…..	Key Types of Impacts	Assessment of Effects
	Nutrient enrichment /eutrophication.	identified by the European Court of Justice that do not comply with the Urban Waste Water Treatment Directive. Investment includes individual projects like building new or upgrading existing water and wastewater treatment plants or upgrading existing networks. It also includes national programmes like leakage reduction or disinfection programmes where important activities are being delivered at a large scale in a consistent and efficient way across the country. The overarching Water Services Strategic Plan under which this sits was subject to Appropriate Assessment and highlighted the need for additional plan/project environmental assessments to be carried out at the tier 2 and tier 3 level. Given the overarching strategies and objectives within the WSSP to protect the environment, and with the implementation of mitigation measures, including project level AA, no in combination effects are predicted.
National Water Resources Framework Plan 2021-2040	Increased abstractions leading to changes / pressure on existing hydrology / hydrogeological regimes.	The plan seeks to develop sustainable water supplies but must consider particularly critical drought periods when assimilation capacity for diffuse runoff may be reduced. The NIS for the framework plan noted that protection of European sites has been integrated into the plan process commencing at options selection where options giving rise to AESI will be eliminated. All other options will be classified according to the extent of mitigation likely to be required to address AESI. Options that, in Uisce Éireann's opinion will satisfy the plan objectives and have no potential for impact on European sites will automatically be the Preferred Approach. Given the overarching approach used in the framework optioneering to protect the environment, and with the implementation of mitigation measures, including the coarse and fine level screening of options, no in combination effects are predicted.
National Waste Water Sludge Management Plan (NWSMP)	Habitat loss and disturbance from new / upgraded infrastructure; Species disturbance; Changes to water quality or quantity; and	Siting of new wastewater sludge infrastructure has the potential to impact the same receptors under the RBMP. A number of mitigation measures have been outlined in Table 6-1 of the NIS for the NWSMP, which includes a number of policies, actions and research initiatives which all aim to protect the environment, including European sites. Given the mitigation measures outlined in both the NWSMP and this NIS, no in-combination effects are predicted.

RBMP In Combination with…..	Key Types of Impacts	Assessment of Effects
	Nutrient enrichment /eutrophication.	
Lead in Drinking Water Mitigation Plan	Introduction of orthophosphate into the water environment / nutrient enrichment / eutrophication.	An AA of the Lead Mitigation Plan has been undertaken[26]. Mitigation measures proposed included a lead services replacement Standard Operating Procedure to ensure best industry practice for the management of site operation. Another measure, Corrective Water Treatment, i.e. orthophosphate treatment, is proposed as an interim measure to reduce lead concentrations in drinking water. A bespoke environmental assessment methodology has been developed for the plan, in consultation with the EPA and NPWS, to ensure that risks to water bodies in the context of achieving WFD objectives and Birds and Habitats Directives, can be assessed and mitigated as the dosing programme is rolled out. An appropriate assessment has also been carried out at project level for each area that will be subject to orthophosphate dosing under the overarching plan. Given the mitigation measures outlined in both the Lead Mitigation Plan and this NIS, no in-combination effects are predicted.
Uisce Éireann Biodiversity Action Plan	Improved habitat and species protection; Improvements to environmental quality; and Climate resilience.	Includes seven objectives to enhance and protect biodiversity; raise awareness and provide educational support, ensure no net loss, promote nature based solutions, collaborate with stakeholders and ensure managers of Uisce Éireann sites have the resources to support the enhancement and management of biodiversity on their sites. These objectives are aligned to the RBMP. Potential for positive in-combination effects.
Shannon Integrated Framework Plan for the Shannon Estuary	Improved habitat and species protection; Improvements to environmental quality; Habitat loss or destruction;	The Strategic Integrated Framework Plan (SIFP) for the Shannon Estuary is an inter-jurisdictional land and marine based framework plan to guide the future development and management of the Shannon Estuary. It has been commissioned by Clare County Council, Kerry County Council, Limerick City and County Councils, Shannon Development and the Shannon Foynes Port Company. The project is being overseen by a multi-agency steering group comprised of the above and other key stakeholders with an interest in the Estuary.

[26] https://www.water.ie/projects-plans/lead-mitigation-plan/public-consultation/Lead-in-Drinking-Water-Mitigation-Plan-Natura-Impact-Statement.pdf

RBMP In Combination with…..	Key Types of Impacts	Assessment of Effects
	Habitat fragmentation or degradation; Species mortality; Disturbance to habitats/species; Alterations to water quality and/or water movement; Introduction or spread of invasive species; and Climate resilience.	The key objective of this project is to research and develop an integrated approach to facilitating economic growth and promoting environmental management within and adjacent to the Shannon Estuary. The Estuary and its environs is a multi-functional zone, with the waters and adjoining lands supporting a range of functions, uses, communities, activities, and environmental resources/assets which bring character, prosperity and vibrancy to the area. However, the development of plans, policies and objectives for these varied interests requires a comprehensive approach to carefully balance competing demands. The Terms of Reference outlined the broad objectives of the plan, include, inter alia, to: • Protect, manage and enhance the natural coastal environment along the Estuary, including its cultural, natural and built heritage; • Safeguard the Estuary's sensitive environmental resources and natural heritage of national, European and International significance; • Establish an evidence-based approach to identifying areas for future development, to ensure proposals will work in harmony with the designated Natura 2000 sites. These objectives align with the objectives of the RBMP; however, there is potential for in-combination effects where the SIFP objectives to facilitate economic growth may act in-combination with potential impacts arising from the planned fish pass mitigation pilot projects at Parteen Weir, and at Annacotty [see Hymo 6 and Hymo 7]. Feasibility studies will be carried out for both pilot projects, with the final design options being subject to Appropriate Assessment. Consent for any proposals arising from this feasibility work must demonstrate that they can be implemented without adverse effects on the integrity of Special Areas of Conservation (SACs) or Special Protection Areas (SPAs). Where adverse effects from proposals remain following mitigation, in line with Habitats Directive Article 6(3), consent for the proposals cannot be granted unless the prerequisites set by Article 6(4) are met.
All Ireland Pollinator Plan 2021-2025	Improved habitat and species protection;	The All-Ireland Pollinator Plan for 2021-2025 is a new five-year road map that aims to help bees, other pollinating insects and our wider biodiversity. It includes 6 objectives centred around making public and private lands more pollinator friendly. These objectives are aligned to the RBMP. Potential for positive in-combination effects.

RBMP In Combination with…..	Key Types of Impacts	Assessment of Effects
	Improvements to environmental quality; and Climate resilience.	
Catchment based Flood Risk Assessment and Management (CFRAM) Programme, under the Floods Directive	Habitat loss or destruction; Habitat fragmentation or degradation; Alterations to water quality and/or water movement; Disturbance; and In-combination impacts within the same scheme.	Flood management measures have the potential to impact on hydromorphology and potentially on the ecological status and favourable conservation status of water bodies. The RBMP includes hydromorphology measures to address the risk, but there are likely to remain instances where flood risk impacts negatively on ecological status and favourable conservation status of water bodies. Potential for in-combination impacts with the RBMP.
National Policy Statement on the Bioeconomy 2018-2040	Increased resilience in habitats and species; Improved habitat and species protection; Reduced disturbance to habitats/species; Improvements to water quality and/or water movement; and Control of spread of invasive species.	This policy sets out a vision, common principles, strategic objectives and a framework for implementation to deliver on this vision for the bioeconomy in Ireland. It includes guiding principles underpinning the bioeconomy including both a sustainability and precautionary principle focussed at protection of the environment. The policy statement recognises that activity in the bioeconomy should not degrade resilience or biodiversity in the ecosystem. No in-combination effects with the RBMP are predicted.

RBMP In Combination with…..	Key Types of Impacts	Assessment of Effects
Food Vision 2030	Habitat loss or destruction; Habitat fragmentation or degradation; Species mortality; Disturbance to habitats/species; Alterations to air quality; Alterations to water quality and/or water movement; Introduction or spread of invasive species; and Climate resilience.	The Food Vision 2030 Strategy is a new ten-year strategy for the Irish agri-food sector (taken to include primary agriculture, food and drink processing and manufacturing, fisheries, aquaculture and fish processing, forestry and forestry processing and the equine sector). The strategy consists of 22 Goals, grouped into four high-level missions for the sector to work toward: • A climate smart, environmentally sustainable agri-food sector; • Viable and resilient primary producers with enhanced wellbeing; • Food which is safe, nutritious and appealing, trusted and valued at home and abroad; • An innovative, competitive and resilient agri-food sector driven by technology and talent. The strategy underwent AA. The NIS concluded that with the application of mitigation measures, no adverse effects were anticipated. Key areas for mitigation noted were in relation to the location and extent of Natura 2000 sites (i.e. where these sites lie in proximity to agricultural activities), managing agricultural activities in accordance with national and EU legislative mechanisms, managing diffuse and atmospheric pollution and regulation and management of fisheries. With the stated mitigation in place, no in-combination effects are anticipated with the RBMP.
Ag Climatise 2020-2050	Increased resilience in habitats and species; Improved habitat and species protection; Reduced disturbance to habitats/species; Improvements to air quality; and	Ag Climatise is a roadmap designed to help all stakeholders to work together to tackle climate change. There are six key tasks under this roadmap including reducing GHG emissions from the sector, increasing the carbon sequestration and carbon storage potential, and reducing nutrient loss to the environment and contribute to improved water quality and biodiversity. These tasks will contribute to reducing pressures on European sites and their QI. Potential for positive in-combination effects with the RBMP.

RBMP In Combination with…..	Key Types of Impacts	Assessment of Effects
	Control of spread of invasive species.	
Northern Ireland River Basin Management Plans	Lack of integration between plan makers and plan implementation.	In Northern Ireland, the Water (Amendment) (Northern Ireland) (EU Exit) Regulations 2019 ensures that the Water Framework Directive (as transposed) and the various supporting pieces of water legislation continue to operate after 1 January 2021. The Department of Agriculture, Environment and Rural Affairs (DAERA) is responsible in Northern Ireland for producing a River Basin Management Plan. As with Ireland's RBMP, Northern Ireland has moved into its third cycle of plan making for 2021-2027 and the draft plan has been subject to public consultation covering the Neagh Bann, North Eastern and North Western River Basin Districts. Coordination is ongoing between the two jurisdictions through a collaborative 'Shared Waters' document, which will be published following publication of the River Basin Management Plans of the Republic of Ireland and Northern Ireland. Where water bodies are shared and flow between Ireland and Northern Ireland, there is connectivity and pathways for both benefits to and negative impacts on receiving waters. Notwithstanding that the RBMP in Ireland and NI are focussed at improving water quality, there is potential for negative impacts on European sites, their QI/SCI and / or site integrity arising if there is a lack of integration between plan makers and plan implementation on key pressures such as land use, agriculture and aquaculture. In Northern Ireland there are 58 SACs, 16 SPAs, 2 Ramsar and 394 Areas of Special Scientific Interest (ASSIs).[27] Three additional European Sites were recently adopted under the Marine Act (Northern Ireland) 2013 which are in close proximity to transboundary waters: Carlingford Marine Proposed SPA (pSPA), East Coast Marine pSPA, North Channel Proposed SAC (pSAC). Carlingford Marine Conservation Zone (MCZ) has also been recently designated. Some designations in Ireland, such as Carlingford Lough SPA and Carlingford Shore SAC, extend into Northern Ireland and as such present potential for transboundary effects. The key challenges for the water bodies relate to diffuse nutrient pollution, chemical status of the water environment and measures to address physical modifications of beds, banks and shore of surface waters. Despite continued action many key elements of biodiversity continues to decline.

[27] https://www.daera-ni.gov.uk/protected-areas [accessed April 2024]

RBMP In Combination with…..	Key Types of Impacts	Assessment of Effects
All National Plans and Projects listed in this table	Improved habitat and species protection; Improvements to environmental quality; Habitat loss or destruction; Habitat fragmentation or degradation; Species mortality; Disturbance to habitats/species; Alterations to water quality and/or water movement; Introduction or spread of invasive species; and Climate resilience.	There is potential for in-combination effects with all national plans and projects listed in this table with the four pilot fish pass mitigation projects outlined and assessed in the Hydromorphology Section of this NIS (Chapter 7). These projects are: • **Hymo 5**: It is proposed that IFI will lead a multi-agency whole of catchment pilot project on the River Dodder from source to sea with the aim of examining the feasibility of opening up this heavily urbanised catchment to migratory fish species by mitigating the five most significant barriers in the lower reaches and progressing to the next stage, as appropriate. • **Hymo 6**: IFI will lead a pilot project to be undertaken for the Annacotty Weir in County Limerick. The project will provide an opportunity to test a collaborative and ecology focussed design approach. It will also test enhanced community engagement opportunities that go beyond the standard consultation practices involved in the planning process, thereby assisting with the design and implementation of the national restoration programme. The pilot project is initially examining the feasibility of mitigation and will progress to the next stages, as appropriate. • **Hymo 7**: Implementation of the roadmap of actions, including the use of state-of-the-art technical solutions, to improve fish migration in the lower Shannon at the Hydroelectric scheme located around Parteen and Ardnacrusha. The pilot project will initially examine the feasibility of mitigation and will progress to the next stages, as appropriate. • **Hymo 8**: A proposed pilot project on the Slaney River at Clohamon will aim to improve fish passage at a medium scale hydroelectric scheme through a state and community collaborative initiative. The pilot project will initially examine the feasibility of mitigation and will progress to the next stages, as appropriate. Feasibility studies must be carried out for all pilot projects, with the final design options being subject to Appropriate Assessment and other environmental assessments, as required. It should be noted that the RBMP does not confer planning in any way and all potential projects arising are subject to the planning process. Consent for any proposals arising from this feasibility work must demonstrate that they can be implemented without adverse effects on the integrity of Special Areas of Conservation

RBMP In Combination with…..	Key Types of Impacts	Assessment of Effects
		(SACs) or Special Protection Areas (SPAs). Where adverse effects from proposals remain following mitigation, in line with Habitats Directive Article 6(3), consent for the proposals cannot be granted unless the prerequisites set by Article 6(4) are met.

7 Amendments to the Draft RBMP post-Consultation

The draft RBMP and associated pre-consultation NIS went on public display in September 2021. Following the end of the consultation period on March 31st 2022, DHLGH reviewed all of the submissions received. This is recorded in the Third Cycle Draft River Basin Management Plan 2022-2027 Consultation Report, which was produced by RPS on behalf of DHLGH and can be viewed on the DHLGH website. This chapter records the assessment of the amendments made to the draft RBMP following consultation.

7.1 Consultation

A total of 1,401 submissions were received directly by the DHLGH from private individuals and groups. These groups included government departments and agencies, local authorities, Non-Governmental Organisations, community groups, companies, corporate bodies, members of the public and political parties. The Water Forum (An Fóram Uisce) brought together the views of many stakeholders with an interest in water and, following intensive discussion and deliberation, submitted a comprehensive document as part of this process.

These submissions were initially categorised as submissions based on:

Consultation Response Questionnaire issued by DHLGH (161);

Template response [originating from the Sustainable Water Network (SWAN), a network of environmental NGOs] (1172); and

Individual ‘free style’ responses from a cross section of stakeholders (68).

Of these, 259 were identified as unique content. RPS were appointed by DHLGH to review these submissions. Thirty-eight themes were identified across the 259 submissions reviewed. The key issues raised within the ten most prominent themes were summarised in Section 1.6.1 of this NIS. A number of the submissions also referenced the AA process, the NIS and European sites. All submissions were reviewed as part of the finalisation of the plan.

The key issues raised in relation to the AA process and how they have been addressed are summarised below in **Table 7.1**.

Table 7.1 Summary of Issues Raised in Relation to Pre-Consultation NIS.

Consultee	Summary of Points Raised	DHLGH Response / How this has been addressed
An Taisce	Section 6.5.4.1 of the NIS for the RBMP should recommend that any derogations which emerge from the NAP should be subject to AA and Article 4 WFD Assessment.	Ireland's Nitrates Action Programme (NAP) is given effect by the European Communities (Good Agricultural Practice for Protection of Waters) Regulations 2022 (S.I. No. 113 of 2022) . The regulations contain specific measures to protect surface waters and groundwater from nutrient pollution arising from agricultural sources. The Regulations transpose the requirements of the Nitrates Directive. The Nitrates Directive has a separate legal process for review of the NAP. While the recommendation is noted, the specific recommendation from An Taisce is appropriate to the NAP review process, not the RBMP review process.
	There should be a specific measure in the RBMP calling for a site-level assessment of derogation farms.	The response above also applies here.
	The mitigation measures and recommendations proposed in the NIS should be incorporated as actions the RBMP document, to translate into actionable measures.	Mitigation measures have been added to the plan (see Appendix 12 of final RBMP).
	Section 6.4.4.3 of the NIS of the draft plan outlined a potential pathway for damage to European sites through proposed restoration measures in relation to mitigation, stating that, "The risk assessment will include the requirement to engage with the AA process". It should be clearly indicated that this is a legal obligation.	Noted. Appropriate Assessment is a legal obligation. Text updated in Chapter 7 of NIS.
	Any such restoration measures must be subject to the full rigour of the AA process, with any screening out based on robust evidence and expert opinion, and it should be fully transparent and include public participation as required under the Aarhus Convention.	Noted.

Community Groups / Associations	Protection of SACs For our Salmonid SACs to survive an entirely new approach will be necessary. All extraction plants that extract water from SAC's must be subject to Appropriate Assessment Screening and EPA licencing and should be located downstream of the SACs.	This issue is already dealt with by the Water Environment (Abstractions and Associated Impoundments) Act 2022 Act provides for a registration, licensing and control regime for water abstractions. It includes a graduated and proportionate registration and licensing system for the abstraction of water, including: • a simple registration system for abstractions above a threshold of 25 m^3 per day, and • a licence requirement for abstractions above a threshold of 2,000 m^3 per day and in certain other circumstances (depending on the significance of the abstraction, discussed below). A significant abstraction is defined in Section 18(1) of the Act as: an abstraction that the EPA determines, following an assessment under subsection (3), on its own or together with other abstractions: (a) alters, or is likely to alter, the hydrological regime of a body of surface water or a body of groundwater such that the water body fails or is likely to fail to meet its environmental objectives, (b) alters or modifies, or is likely to alter or modify, the flow condition, continuity or morphological condition of a body of surface water as a result of the existence or operation of an associated impoundment, such that the water body fails or is likely to fail to meet its environmental objectives, or (c) causes or is likely to cause a protected area to fail to achieve its environmental objectives. (see Chapter 3 on setting environmental objectives).

Cork County Council	Legislation at present is inadequate to allow appropriate assessment of environmental impacts of agricultural drainage, with lack of transparency where agricultural drainage development takes place.	New land drainage works on lands used for agriculture (excluding drainage or reclamation of wetlands) are controlled by DAFM under the 2011 European Communities (Environmental Impact Assessment) (Agriculture) Regulations (S.I. No. 456/2011). However, there are a number of relevant Actions in the RBMP which will contribute to strengthening controls on agricultural drainage. These include; **Hymo 1:** A Hydromorphology Expert Group will be established to support the new National Hydromorphology Programme. This Expert Group will identify interim measures, which will be readily implemented during the third RBMP cycle to assist in removing hydromorphological pressures. **Hymo 2:** DHLGH will lead the development of a new enhanced and consolidated legislative regime to address pressures on the physical condition of waters. [Timeframe 2026]. **Hymo 4:** A Sectoral Action Work Plan for Hydromorphology will be developed, which will include measures and plans to address the 448 waterbodies at risk from hydromorphology, including barriers, channelisation, drainage, sediment and flood protection. It will be led and coordinated by DHLGH with supporting bodies IFI, DAFM, Forestry, OPW and DECC. [Timeframe Q4 2024]
	The plan should establish a clear differentiation between streams and farm drains for farmers, while legislation at present is inadequate to allow for appropriate assessment of environmental impacts of agricultural drainage, with the lack of transparency where agricultural drainage development takes place.	The response above is directly relevant here, particularly in relation to Action **Hymo 2**, which commits to the development of a new enhanced and consolidated legislative regime to address pressures on the physical condition of waters. All drainage works, whether land drainage or arterial drainage will be within the scope of this regulatory framework.

EPA	Mitigation measures from the SEA Environmental Report and NIS should be fully integrated into the RBMP, or if not, an explanation provided as to the reasons for exclusion. The plan should also provide a clear indication of how these mitigation measures will be implemented.	Mitigation measures have been added to the plan (see Appendix 12 of final RBMP).
Government Department / Agency / Body	The protection of non-listed habitat for Annex IV/V species is lacking within the current AA process. A mention of guidance on protecting this habitat especially in SAC areas would be useful in Section 2.6.	Reference to NPWS Guidance on this issue has been added to Section 3 of this NIS.
IFI	In addition to salmon, the upstream and downstream passage of other migratory fish species such as River Lamprey, Sea Lamprey, Sea Trout, Twaite Shad, Allis Shad, and European Eel needs to be fully considered. Migratory runs of species residing within freshwater such as Brown Trout and Brook Lamprey also need to be considered.	It is clear from the RBMP and Programme of Measures that the new National Barriers Mitigation Programme will fully consider all migratory fish species. See Action **Hymo 3**, which states that IFI will establish a restoration programme to mitigate the negative impact of past construction in or near water bodies.
	Reference is made to restoration targets (page 62) and water dependent habitats and species listed in the Nature Directives. It is essential that common water dependent species that are not listed in the 'Natura' Directives are also recognised here, i.e. "Life Under Water"; for example many fish species have some level of protection in the Fisheries Acts and various Bye-laws but are not listed in the Nature Directives, but restoration programmes are still required for many.	The nature of Ecological Status under the WFD is that all aquatic biological elements are included in water body classification, regardless of whether they are protected by other directives, such as the Habitats Directive. Article 4 of the WFD also requires that water objectives established under other protected area objectives must be addressed in the RBMP. Where more than one of the objectives relates to a given body of water, the most stringent shall apply.
LAWPRO	The plan should reflect fundamental principles of how the 46 catchment plans are to be developed needs to be determined by DHLGH prior to preparation of the template by LAWPRO. It should also determine whether or not these are statutory plans (as sub-plans to the RBMP) and if they require SEA and AA.	The 46 Catchment Management Work Plans support the RBMP and Programme of Measures. They are intended to provide more granular details of planned actions in each catchment for the purposes of monitoring /tracking progress, assessment and communications. The Catchment Management Work Plans will include; • The Actions for Individual Waterbodies,

		• Outlines Roles, • Responsibilities of Implementing Bodies & • Timelines per Catchment The Catchment Management Work Plan template will be screened for AA and SEA.
SEA Related Comments	A number of mitigation measures refer to the requirement for further plans (e.g., Rural Waters Strategic Plan, Integrated Catchment Management Plans, Water Services Strategic Plan) to undertake SEA and appropriate assessment screening. It is important that DHLGH and relevant plan making authority(ies) consider the requirements of the SEA Regulations (S.I. 435 of 2004, as amended) and the Habitats Directive, early, in the plan-preparation process.	Noted.
SWAN	Carry out an independent legal review of NPWS guidance on the licensing of aquaculture activities within Natura 2000 sites (15% threshold for likely disturbing activities).	Feedback has been communicated to NPWS.

7.2 Assessment of Proposed Amendments to the Draft RBMP

On foot of this review of submissions, a series of proposed amendments to the draft plan were identified. Further assessment of all proposed amendments was undertaken in the NIS to inform the AA process and to determine if any of the proposed amendments would give rise to adverse effects on the integrity of any European sites, either alone or in combination with other plans and projects.

The assessment of the proposed amendments is included in the below tables of this NIS. In many cases, the amendments proposed reflect addition of measures previously proposed in the SEA Environmental Report, the NIS on the draft RBMP and extensive stakeholder feedback on ways to strengthen the RBMP in the context of protecting and restoring European sites.

7.2.1 The Importance of Protecting our Natural Waters

RBMP Action No.	Draft RBMP Action No. and Wording	Final RBMP Action Wording [Blue text / strikethrough denotes significant changes]	Assessment of Effects and Requirement for Mitigation
1.1	*New action arising following Public Consultation*	Integrated catchment management approaches will be used to identify and decide on further specific measures for each water body, where they are required in addition to those set in this plan. These will be included in the 46 Catchment Management Work Plans, which will be used to locate measures within each catchment. The co-benefits of water-focused measures on climate and biodiversity will also be identified.	The key activity in relation to this action is the adoption of an integrated catchment management approach to identify and decide on further specific measures for each water body, where required. This includes the coordination of the Sectoral Action Work Plans and subsequent Catchment Management Work Plans, the inclusion of proposed measures within same and reporting of measures at water body scale. The EPA notes that effective management of water requires the assessment of pressures on water bodies at an appropriate scale – large enough to account for all of the relevant information, yet small enough to ensure that people who live in the area can easily relate to their catchment. Experience, both nationally and internationally has shown that an integrated approach to managing individual catchments of an appropriate scale is necessary to protect and improve water resources. It involves: • Gathering the best available information to understand the catchment – where the water comes from, how it flows through the landscape both overground and underground, and what activities in the catchment may be causing pollution. • Looking at all the uses of water – drinking, agricultural, industrial and recreational, and also the vital ecosystems that depend on water to survive. • Engaging local communities and involving them in decision making and management of their catchment.

			• Adopting appropriate measures to ensure that activities that represent a significant threat to water resources are effectively managed. • Applying the scientific and local knowledge of how the catchment operates to protect and improve water, providing a healthy, resilient, productive and valued resource that supports vibrant communities. Taking an integrated catchment management approach to address water quality issues is a positive measure. As noted in Action 6.1 [Action 2.4(1) in the draft plan], the Catchment Management Plans will be screened for AA. **No significant adverse effects** foreseen on European sites, their QIs/SCIs, conservation objectives or site integrity.
1.2	*New action arising following Public Consultation*	The Catchment Management Work Plans will include the list of water bodies, their associated status, significant pressures/issues and targeted measures, along with outcomes-based targets for the third cycle and key performance indicators to monitor progress and outcomes. Justification for water bodies not meeting their WFD objective by 2027 should also be included in catchment management work plans, in line with Article 4 of the WFD.	The key activities in relation to this action include the coordination of the preparation of the 46 Catchment Management Work Plans through regional committees, dissemination of the work plan template, and the provision by implementing bodies of reporting (work programmes, action plans, local authority water action plans) for online reporting in the 46 catchments. As noted in Action 6.1 [Action 2.4(1) in the draft plan], the Catchment Management Plans will be screened for AA. **No significant adverse effects** foreseen on European sites, their QIs/SCIs, conservation objectives or site integrity.
1.3	*New action arising following Public Consultation*	Sectoral Action Work Plans will be developed. They will set out the actions to be taken by the relevant authorities in line with their legally binding general duties under Article 3(1) of the 2003 Water Policy Regulations (SI 722 of 2003).	The key activity relates to the development of Sectoral Action Work Plans. This will include the re-establishment of the Programme of Measures working group, template development and engagement by each sector in the preparation of the plans.

			No significant adverse effects foreseen on European sites, their QIs/SCIs, conservation objectives or site integrity.
1.4	*New action arising following Public Consultation*	When developing new policy, Government Departments will have regard to the OECD principles[28] for policy coherence to consider cross-cutting issues; trade-offs and synergies with other key policy objectives.	The key activity in relation to this action is having regard to OECD principles for policy coherence when developing new policy. **No significant adverse effects** foreseen on European sites, their QIs/SCIs, conservation objectives or site integrity.

7.2.2 The Status of Ireland's Water Bodies

RBMP Action No.	Draft RBMP Action No. and Wording	Final RBMP Action Wording [Blue text / strikethrough denotes significant changes]	Assessment of Effects and Requirement for Mitigation
2.1	*New action arising following Public Consultation*	The DHLGH shall continue to engage with counterparts in Northern Ireland via the North/South Water Framework Directive Co-ordination Group as is necessary to ensure coordination of programmes of measures across the whole of shared river basin districts.	The key activity will be engagement with counterparts in NI to ensure cooperation for water bodies that flow into or through both jurisdictions. This is considered positive for European sites and their UK equivalent, as it will ensure alignment on achieving objectives, both under the WFD and the Nature Directives. **No significant adverse effects** foreseen on European sites, their QIs/SCIs, conservation objectives or site integrity.
2.2	**Action 2.2(1):** In cooperation with our northern colleagues, DHLGH will prepare a "shared waters" document that will outline the water bodies that flow into or	A collaborative 'Shared Waters' document will be published following publication of the	Action previously assessed as **Action 2.2(1)** in draft RBMP NIS [see Section 6.4.1.1 above].

[28] OECD (2019), Recommendation of the Council on Policy Coherence for Sustainable Development, OECD, Paris.

	through both jurisdictions and the work to be undertaken to ensure they meet their environmental objectives as reported in the River Basin Management Plans for Ireland and Northern Ireland.	River Basin Management Plans of the Republic of Ireland and Northern Ireland.	Text has been refined but action remains the same.

7.2.3 Setting Environmental Objectives

RBMP Action No.	Draft RBMP Action No. and Wording	Final RBMP Action Wording [Blue text / strikethrough denotes significant changes]	Assessment of Effects and Requirement for Mitigation
3.1	*New action arising following Public Consultation*	DHLGH will arrange for the development and application of a methodology for the screening and application of WFD Article 4(5) exemptions, extending the deadline for compliance beyond 2027, where justified in accordance with the strict criteria stipulated within the Directive.	The key activity in relation to this action is the commissioning and development of a methodology for the screening and application of WFD Article 4(5) exemptions. Article 4(5) exemptions must be subject to satisfying strict criteria, where avoidance, substitution, mitigation and management are not feasible. Consideration must also be given to the interrelationship between the Water Framework Directive and the Habitats Directive.
3.2	**Action 3.4(2):** Update the Climate Adaptation Plan for the Water Quality and Water Infrastructure Sectors	DHLGH will review and update the Climate Adaptation Plan for the Water Quality and Water Infrastructure Sectors.	Action previously assessed as **Action 3.4(2)** in draft RBMP NIS [see Section 6.4.2.3 above].
3.3	**Action 3.4(1):** To ensure that the actions selected are effective, sustainable and cost efficient under changing conditions, a "climate check" will be required for all measures carried out under this plan.	LAWPRO will co-ordinate a simplified climate change sensitivity analysis or "climate check" which will be undertaken in line with EU Guidance during the third RBMP cycle at the level of Catchment Management Work Plans. The check will also inform the setting of RBMP environmental objectives for the following fourth cycle.	The key activity for this action is climate change sensitivity analysis for all measures carried out under the plan. Climate change has the potential for a number of effects on European sites, their QI/SCI and site integrity, notably potential to alter river flows and quality and the functioning of water-dependent habitats; which will have direct and indirect effects for QI and SCI which may be dependent on the habitat. There is also potential to impact QI and SCI related to GWDTE through changes in groundwater quantity or quality. Changes in concentration of pollutants, availability of suitable habitat for resting, breeding, changes

			in species dynamics and increased success for invasive species may result from the effects of climate change. This review itself will be positive, ensuring that the climate change effects relevant to protection of water-dependant European sites can be considered in the context of climate change effects on biodiversity, however the sensitivity analysis must explicitly consider the potential for changes in QI/SCI population ranges and dynamics if adverse effects are to be avoided.
3.4	**Action 3.4(3):** Examine opportunities in the monitoring programme to improve our understanding of climate change trends.	The EPA will review the national monitoring programme and integrate climate change considerations such as identifying water bodies likely to be most vulnerable to climate change and detecting the direct impacts of climate change.	The key activity for this action relates to opportunities for monitoring. **No significant adverse effects** foreseen on European sites, their QIs/SCIs, conservation objectives or site integrity.
3.5	**Action 3.4(4):** Support additional research and pilot projects in the area of climate change.	Support additional research in the area of climate change in Ireland (impacts and adaptation).	Action previously assessed as **Action 3.4(4)** in draft RBMP NIS [see Section 6.4.2.3 above].
3.6	**Urban Runoff 3**The National Bathing Water Expert Group to undertake a project to determine the most suitable approach to protecting bathers' health outside of the current bathing season in Dublin Bay	The National Bathing Water Expert Group to undertake a research project to determine the most suitable approach to protecting bathers' health outside of the current bathing season.	Action previously assessed as **Urban Runoff 3** in draft RBMP NIS [see Section 6.4.5.5 above].
3.7	**Urban Runoff 4:** DHLGH to amend the existing Bathing Water Regulations (S.I. No. 79 of 2008) to provide discretion to local authorities on determining the	DHLGH will amend the existing Bathing Water Regulations (S.I. No. 79 of 2008) to facilitate local authorities defining the length of the "bathing season" on determining the bathing season for individual bathing waters in respect of the "bathing waters" within their jurisdiction. DHLGH will also consider the	The key activity is in relation to amending the existing Bathing Water Regulations (S.I. No. 79 of 2008) to provide discretion to local authorities on determining the bathing season for individual bathing waters.

	bathing season for individual bathing waters.	research outcomes and recommendations from the National Bathing Water Expert Group. The outcome of the EU regulatory fitness and performance programme (REFIT) review of the Bathing Water Directive will be assessed in due course.	**No significant adverse effects** foreseen on European sites, their QIs/SCIs, conservation objectives or site integrity.
3.8	*New action arising following Public Consultation*	The water-related requirements of water-dependant habitats and species will be reviewed by the Water Division, the National Parks and Wildlife Service and the EPA during the 3rd RBMP cycle, taking account of the most recent scientific evidence. If necessary, proposals for updating the related water standards will be made and this will be integrated into the catchment management process.	The key activity in relation to a review of the water-related requirements of water-dependent habitats and species, to include the most up-to-date scientific information. **No significant adverse effects** foreseen on European sites, their QIs/SCIs, conservation objectives or site integrity.
3.9	*New action arising following Public Consultation*	The National Parks and Wildlife Service and the Water Division, both of this Department, and other relevant stakeholders will continue to engage closely in the catchment management planning process as it relates to Freshwater Pearl Mussel to ensure conformity with the requirements of the Habitats Directive and the Water Framework Directive.	The key activity in relation to this measure is the engagement of key stakeholders during the catchment management planning process to ensure that the requirements of the Habitats Directive and the Water Framework Directive are included. **No significant adverse effects** foreseen on European sites, their QIs/SCIs, conservation objectives or site integrity.
3.10	**Action 3.3(1):** Undertake a technical review and public consultation on the designation of Heavily Modified Water Bodies.	The Minister for Housing, Local Government and Heritage will undertake a short public consultation before deciding whether to designate or de-designate water bodies as HMWBs. There were 466 water bodies, which the EPA has found to meet the criteria for designation. The Minister will take into account the recommendations of the EPA	The key activity for this action is a technical review and consultation. **No significant adverse effects** foreseen on European sites, their QIs/SCIs, conservation objectives or site integrity.

		and the key concerns raised in the submissions to the consultation process.	
3.11	*New action arising following Public Consultation*	A review of arterial drainage requirements and the underpinning Arterial Drainage Act will be undertaken in order to inform future land use policy decisions arising out of the Land Use Review and to support the preparations for the implementation of the new Nature Restoration Law and the Heavily Modified Water Body review process.	The key activities in relation to this action are an assessment and review of the implications of different land use policy options arising from the Land Use Review on arterial drainage requirements; and assessing and advising on legislative changes to the Arterial Drainage Act to support national land use policy and ensure that future arterial drainage practices are sustainable and support the environmental objectives set out in the 2021 Climate Action Plan, the River Basin Management Plan, the National Biodiversity Action Plan and the related Nature Restoration Law, as well as flood risk management objectives. **No significant adverse effects** foreseen on European sites, their QIs/SCIs, conservation objectives or site integrity.

7.2.4 Measures Required

RBMP Action No.	Draft RBMP Action No. and Wording	Final RBMP Action Wording [Blue text / strikethrough denotes significant changes]	Assessment of Effects and Requirement for Mitigation
4.1	**Action 3.1(1):** Measures to be put in place to ensure the additional evidence required to determine if water bodies are 'At Risk' can be obtained.	The EPA and LAWPRO, with the support of the implementing bodies and other stakeholders, will continue to assess the impacts of pressures on waters to inform the measures that are needed.	The key activity are measures to ensure additional evidence base. While measures are not specified, this characterisation is essential to identifying appropriate actions to deliver improved water quality, which will have positive impacts for water dependant ecosystems. **No significant adverse effects** foreseen on European sites, their QIs/SCIs, conservation objectives or site integrity.

7.2.5 Programme of Measures to 2027

7.2.5.1 Overview of the Programme of Measures

7.2.5.1.1 How We Protect and Restore Water

RBMP Action No.	Draft RBMP Action No. and Wording	Final RBMP Action Wording [Blue text / strikethrough denotes significant changes]	Assessment of Effects and Requirement for Mitigation
5.1	**Action 2.4(3):** The Department along with the governance groups (WPAC, NCMC and NTIG) will continually review the progress in the implementation of the programmes of measures and the distance to the 2027 target.	The Department of Housing, Local Government and Heritage will oversee an independent review of progress with the implementation of the Programme of Measures.	The key activity is continuous review of implementation. This is considered positive as it will allow for progress to be tracked and interventions made if measures are not being delivered. **No significant adverse effects** foreseen on European sites, their QIs/SCIs, conservation objectives or site integrity.
5.2	**Protection 1:** Working Group to be established under the National Technical Implementation Group to examine the implementation of current legislation governing activities which pose a risk to waters and to identify opportunities to improve compliance with it.	The National Technical Implementation Group will identify the issues preventing water quality objectives from being achieved and will identify any further evidence, legislative, policy or implementation gaps that need to be addressed	The key activity will be the identification of issues causing declines in water quality and the examination of the implementation of current legislation focussed on water protection, including gaps that need to be addressed to prevent declines. **No significant adverse effects** foreseen on European sites, their QIs/SCIs, conservation objectives or site integrity.
5.3	**Areas for Action 1**: Restoration works to be advanced in 427 areas where environmental objectives are not being met.	LAWPRO will confirm significant pressures and work with implementing bodies and stakeholders to promote the implementation of appropriate restoration measures in each Area for Action (restoration) where environmental objectives are not being met.	Restoration works are likely to include improvement to natural flood alleviation, riparian improvements, replacing hard infrastructure with a non-structural solutions, removals of weirs etc. all with the intention of returning rivers to as close to their natural state as possible. Broadly restoration measures are positive, however, there is potential for adverse effects on European sites, their QI/SCI and site integrity where connectivity to these sites
5.4	**Areas for Action 2:** Protection measures to be progressed in 85 areas that are	LAWPRO will confirm significant pressures and work with implementing bodies and	

	meeting their environmental objectives but require protection to ensure their water quality does not deteriorate.	stakeholders to progress the implementation of appropriate protection measures in areas that are meeting their environmental objectives but require protection to ensure that water quality does not deteriorate.	and their conservation objectives under the Habitats Directive and Birds Divertive are not recognised and accounted for in the restoration measures proposed. Actions could lead to impacting on the ability to maintain and restore the favourable conservation status of QI/SCI habitats/species, changes in population dynamics, spread of invasive species and reduced ecological connectivity etc. To avoid adverse effects on any European site resulting from the proposed restoration works, works programmes and projects the DHLGH will develop a process to ensure that support, funding and coordination of such works and projects undergoes a risk assessment (carried out by LAWPRO or similar) with regard to likely significant effects on any European site, alone or in combination with other plans and projects. The risk assessment will include the legal obligation ~~requirement~~ to engage with the AA process. Given that this is locally driven, the most appropriate stage at which to undertake risk assessments is at the LAWPRO level where ecological expertise to support communities is in place to undertake the assessments. The DHLGH will ensure that there is awareness raising and training associated with any restoration works, works programmes and projects to ensure the potential for effects on any European site are understood more widely. Assessment will have regard to the Catchment Management Plans (noting the mitigation required in relation to the content of templates noted under Action 6.1 [previously Action 2.4(1)]. This will ensure a more coordinated approach to local actions. All catchment projects shall be subject to the AA process prior to implementation.
5.5	**Areas for Action 4:** The Blue Dot Programme to draft a detailed work plan for waters with a High-Status Objective, with a view to them forming part of the proposed local catchment plans.	LAWPRO, in cooperation with the EU LIFE IP Waters of LIFE project team, will publish a new Blue Dot Programme work plan for waters with a High Status Objective.	
5.6	**Areas for Action 3**: Catchment projects aimed at improving water quality to be advanced in 15 areas.	Catchment projects aimed at improving water quality to be advanced in 15 areas (including community initiatives, Rivers Trusts, EIPs, PEACE+).	

7.2.5.2 Environmental Measures

7.2.5.2.1 Agriculture

RBMP Action No.	Draft RBMP Action No. and Wording	Final RBMP Action Wording [Blue text / strikethrough denotes significant changes]	Assessment of Effects and Requirement for Mitigation
Agri 1	**Agriculture 1:** GAP Regulations - The existing GAP Regulations are due to expire and be replaced at the end of 2021. The Nitrates Expert Group is working on the development of the new Nitrates Action Programme, which will be implemented by the regulations. It is expected that the new NAP will: • Retain the existing controls on Nitrogen and Phosphorous from agriculture. • Implement tighter controls on nitrogen and phosphorus inputs by: ➢ Establishing a chemical fertiliser register for farmers ➢ Providing for enhanced programmes of enforcement. ➢ Stipulating tighter controls on the use of chemical nitrogen fertilisers focussed on critical source areas ➢ Incorporate an industry-led initiative to reduce agricultural impacts on water quality.	DHLGH and DAFM will oversee the implementation of the stronger and more targeted Nitrates Action Programme. The Fifth Nitrates Action Programme (2022-2025) retains and strengthens the existing controls from agricultural nutrient impacts on water and will implement tighter controls on nitrogen and phosphorus inputs by: 1) Stipulating tighter controls on the timing and methods of application of chemical nitrogen fertilisers and slurry. 2) Reducing the annual maximum fertilisation rate of nitrogen on grassland by 10% in 2022 with potential for a further reduction of, at least, 5% in 2024 following the Interim Review in 2023. 3) Reduction in the maximum derogation stocking rate on farms in waterbodies where there is, or a risk of, declining water quality. 4) Implementing a livestock excretion banding system from Q1 2023 to more accurately reflect the different rates of organic nitrogen loading from different sized animals in the maximum stocking rate calculations. 5) Establishing a national fertiliser sales database for farmers.	Nutrient loses to water remain one of the most significant pressures on water quality nationally with the EPA identifying the two main sources as agriculture and wastewater. The SWMI consultation noted that nutrient loss is most common in freely draining soils, where it leaches readily to groundwater before being discharged into river systems and onwards to estuaries and coastal waters where it causes water quality problems. In the freely draining catchments, nitrate losses are closely correlated with farm intensity: the higher the application of nitrate to land, the higher the nitrate concentrations in waters. Nitrogen (and phosphorus) losses from such catchments will continue to rise unless controlled. These nutrient losses in addition to impacting water quality can also impact on the favourable conservation status of water-dependant European sites. The GAP Regulations are intended to provide the control with regard to nutrients however, the most recent monitoring results from the EPA indicate that trends in terms of nutrient pollution are not going in the right direction, partly as a result of the ongoing expansion of the agriculture sector under Food Wise 2025 and its successor. A stronger new NAP has been prepared and includes many more stringent measures than its predecessor, based on best available science and through discussion with the Nitrates Expert Group. These include measures such as:

			1) Stipulating tighter controls on the timing and methods of application of chemical nitrogen fertilisers and slurry. 2) Reducing the annual maximum fertilisation rate of nitrogen on grassland by 10% in 2022 with potential for a further reduction of, at least, 5% in 2024 following the Interim Review in 2023. 3) Reduction in the maximum derogation stocking rate on farms in water bodies where there is, or a risk of, declining water quality. 4) Implementing a livestock excretion banding system from Q1 2023 to more accurately reflect the different rates of organic nitrogen loading from different sized animals in the maximum stocking rate calculations. 5) Establishing a national fertiliser sales database for farmers. The actions arising from the new NAP have potential for significant adverse effects on European sites; particularly mindful of nutrient loss to water from agriculture is one of the most significant pressures on water quality in Ireland. The 5th NAP was be subject to AA and SEA in its own right and includes mitigation measures for the avoidance of impact to European sites that must be adhered to. It is also required to be cognisant of the RBMP; including the mitigations identified within this NIS for the RBMP. An interim review of the 5th NAP will be undertaken and any required additional measures will be implemented. The output of this review will include a report on water quality assessment and new measure that will be given effect through amendment of the GAP Regulations. With respect to nitrates derogations, in the absence farm scale AA for over 5000 derogation farms, the risk assessment around the selection of farms to be inspected has been improved and water considerations have been brought into that risk assessment process.

			In addition, inspections have increased from 5% to 10% per annum [see **Agri 2** below]. As outlined above, reduction in the maximum derogation stocking rate on farms in proximity to water bodies where there is (or is a risk of) declining water quality is required. Decision-making utilised the science presented by the EPA in their Catchments of Concern assessment[29].
Agri 2	**Agriculture 6:** Local authorities and the EPA, through the NIECE network, will ensure that compliance assurance (including enforcement) actions for agricultural activities will be further enhanced and ensure that there is an increased targeting of inspections by local authorities based on water quality results, critical source areas and the EPA's PIP Maps.	Local Authorities will strengthen the inspection and enforcement relating to agricultural diffuse pollution. A total of 57 new Inspectors in local authorities have been allocated for the National Agricultural Inspection Programme (NAIP) and five new staff have been allocated to the EPA to oversee the programme. An additional four staff have been allocated to LAWPRO to help in co-ordinating the activity and avoiding duplication where possible. Inspections will be targeted and risk-based using all the available evidence, including water quality data, the EPA's PIP Maps and the Targeting Agricultural Measures Map on up to 4,500 farms per annum during the lifetime of the Nitrate Action Programme. DAFM will undertake 500-1,000 inspections per year under the GAP Regulations focused in Q1 where risk of nutrient impact on water quality is high. DAFM has increased their derogation inspections from 5% to 10% of all derogation farms per year and will undertake approximately 700 inspections per annum.	The key activity will be increased enforcement and inspections. **No significant adverse effects** foreseen on European sites, their QIs/SCIs, conservation objectives or site integrity.
Agri 3	**Agriculture 2:** CAP Strategic Plan - New Rural Development Programme Regulations under the National CAP	DAFM will implement Ireland's CAP Strategic Plan with a strong emphasis on the achievement of a higher level of	The CAP Strategic Plan was subject to both SEA and AA. The AA Screening Determination concluded that:

[29] EPA 2021. Assessment of the catchments that need reductions in nitrogen concentrations to achieve water quality objectives. WFD River Basin Management Plan – 3rd Cycle.

	Strategic Plan will underpin the establishment of a new green architecture that aims to deliver and reward positive environmental outcomes, including water, biodiversity and climate mitigation and adaptation objectives.	environmental ambition. This includes implementing the new Green Architecture of (1) Conditionality, (2) Pillar I Eco-Schemes and (3) the Pillar II Interventions such as ACRES and the new Water EIP.	*Given the strategic nature of the CAP Strategic Plan, its aims to facilitate and support agriculture in Ireland and the existing threats and pressures posed by agricultural activities to the favourable conservation condition of Annex 1 habitats and Annex 2 species for which European sites are designated and in light of the current uncertainties relating to the specifics of the Plan, it is considered that the Plan has the potential to result in likely significant effects to European Sites, in view of their conservation objectives. As such, a Natura Impact Statement (NIS) is required to inform an Appropriate Assessment of the Plan to be undertaken by the DAFM.* The proposed new green architecture as foreseen under the CAP Strategic Plan will therefore need to take full account of the mitigation measures identified in the NIS being prepared for that Plan (under separate cover). No additional mitigation required under RBMP subject to full implementation of any mitigations identified in the NIS for the CAP Strategic Plan.
Agri 4	*New action arising following Public Consultation*	Eco-scheme measures will contribute to the protection of water quality. DAFM will promote and target the uptake of these measures in locations at farm level where they will maximise water protection. This will be achieved through training and farm advisory services and by using the Pollution Impact Potential (PIP) maps generated by the EPA.	The key activity in relation to this measure is the delivery of advisor training and promotion of the use of EPA PIP maps to target the right measure in the right place. This will increase the efficiency of measures within eco-schemes that contribute to the protection of water quality by increasing the knowledge base around targeting of measures. **No significant adverse effects** foreseen on European sites, their QIs/SCIs, conservation objectives or site integrity.
Agri 5	*New action arising following Public Consultation*	The Water EIP project led by LAWPRO, in partnership with Teagasc and Dairy Industries Ireland will focus on reducing losses of	The key activity relates to the delivery of the 'Farming for Water' EIP which aims to support farmers in implementing on-farm water protection and mitigation

		phosphorus, nitrogen, sediment and, where relevant, pesticides to water from agricultural lands by promoting the adoption of innovative best practice in nutrient management, the application of Nature based Natural Water Retention Measures (NWRM) and other suitable measures. The project will aim to support up to 15,000 farmers in implementing on-farm water protection and mitigation measures.	measures, and also measures to support climate, environment and biodiversity. The Water EIP provides a €60m investment as part of the government's commitment to support farmers in achieving water quality improvements. Through this project, LAWPRO will work with farmers on an individual basis to improve water quality. This may be achieved through, for example, the adoption of innovative practices in nutrient management, the application of nature-based Natural Water Retention Measures (NWRM) and other measures at farm level following the principles of Integrated Catchment Management. Measures will be designed and targeted specifically to address local challenges. The Water EIP Guidelines Document notes that, "Projects must also be guided by sufficient agricultural, biodiversity and catchment science expertise, i.e. ecologist, catchment scientist, agricultural advisor etc." Depending the nature of the measures designed by the Water EIP they may require screening for AA. **No significant adverse effects** foreseen on European sites, their QIs/SCIs, conservation objectives or site integrity.
Agri 6	*New action arising following Public Consultation*	DHLGH and DAFM will put arrangements in place to ensure independent assessments and reviews of the efficacy of the Nitrates Action Programme (NAP), the CAP Strategic Plan and the Water EIP (and other relevant measures) to bring the 1,000 waterbodies impacted by agriculture up to good status and to prevent deterioration. They will identify additional measures, where necessary, which will be implemented during the lifetime of the plan or beyond, where justified under Article 4 of the WFD.	The key activity in relation to this measure is to put arrangements in place to ensure independent assessments and reviews of the NAP and CAP. **No significant adverse effects** foreseen on European sites, their QIs/SCIs, conservation objectives or site integrity.

		Mechanisms for review will include: DHLGH monitoring & assessment of progress with the programme of measures, EPA's statutory role in assessing the NAP, EPA research projects and the CAP Strategic Plan Performance Monitoring and Evaluation Framework (PMEF).	
Agri 7	*New action arising following Public Consultation*	In support of the Catchment Management Work Plans, the Department of Agriculture, Food and the Marine will publish an Agricultural Sectoral Action Work Plan to reduce nitrogen losses to waters in areas where levels are increasing or are too high, and to bring nitrogen, phosphorous and sediment losses to water from agricultural sources within sustainable levels by 2027.	The key activity relates to the publication of a Sectoral Action Work Plan. This includes engagement with the Programme of Measures working group, review of Agricultural Work Plans, agreement on templates, data for input into Catchment Management Plans, data collation and tracking through annual reporting. **No significant adverse effects** foreseen on European sites, their QIs/SCIs, conservation objectives or site integrity.
Agri 8	**Agriculture 3:** Teagasc will progress the development of a web-based Farm Sustainability Plan that will complement the existing Nutrient Management Planning online tool and support the wider Agricultural Knowledge and Information Systems (AKIS) programme.	Teagasc will develop an online Farm Sustainability Plan for farmers complementing existing Nutrient Management Planning online tool to support the wider Agricultural Knowledge and Information Systems (AKIS) programme.	Action previously assessed as **Agriculture 3** in draft RBMP NIS [see Section 6.4.5.1 above].
Agri 9	**Agriculture 4:** Consideration will be given to extending and expanding LAWPRO and ASSAP to support the implementation of the new CAP Strategic Plan. There will be an increased focus on sustainability across the entire farm advisory service (both Teagasc and private advisory services). This may include a role in the preparation of Farm Sustainability Plans.	Extend and expand the local authorities' water protection office: LAWPRO will be extended for the full duration of Cycle 3 up to 2027. The CCMA will identify the appropriate level of resources and involvement of LAWPRO to meet WFD objectives up to 2027 and beyond in future RBMPs.	The key activity for this action relates to resourcing. **No significant adverse effects** foreseen on European sites, their QIs/SCIs, conservation objectives or site integrity.

Agri 10	**Agriculture 4:** As above	Provide free on-farm advice to farmers: The sustainability advisory service (ASSAP) will be extended for the full duration of Cycle 3. The dairy industry has increased the number of advisors involved in ASSAP by six for the period 2022 to 2027.	The key activity in relation to this action is the provision of free on-farm advice to farmers with consideration of the ASSAP Review Report Recommendations. **No significant adverse effects** foreseen on European sites, their QIs/SCIs, conservation objectives or site integrity.
Agri 11	*New action arising following Public Consultation*	To support the goal of targeting the right measure in the right place all farm advisers involved in Environmental Schemes including the Cooperation Projects and Water EIP, will be provided with the appropriate level of catchment science training to ensure that measures are sufficiently targeted. In addition, these farm advisers will be made aware of the various other relevant funding schemes available to farmers to support the right measure in the right place.	The key activity in relation to this action is the delivery of training to upskill farm advisors. **No significant adverse effects** foreseen on European sites, their QIs/SCIs, conservation objectives or site integrity.
Agri 12	*New action arising following Public Consultation*	Upskill farmers and advisors to ensure they have the knowledge and tools to implement appropriate measures to reduce the impact on water quality from farming practices.	The key activity in relation to this action is the delivery of training to upskill farmers and advisors. **No significant adverse effects** foreseen on European sites, their QIs/SCIs, conservation objectives or site integrity.
Deleted **(now Hymo 2)**	**Agriculture 5:** The development of a new authorisation system for instream engineering works (see new Controlled Activities for the Protection of Waters regime in Section on Hydromorphology) will strengthen controls of land drainage practices and their enforcement.	~~**Agriculture 5:** The development of a new authorisation system for instream engineering works (see new Controlled Activities for the Protection of Waters regime in Section on Hydromorphology) will strengthen controls of land drainage practices and their enforcement.~~ Moved to hydromorphology section.	N/A

7.2.5.2.2 Physical modifications to the flow, form and/or function of natural surface water bodies (Hydromorphology)

RBMP Action No.	Draft RBMP Action No. and Wording	Final RBMP Action Wording [Blue text / strikethrough denotes significant changes]	Assessment of Effects and Requirement for Mitigation
Hymo 1	*New action arising following Public Consultation*	A Hydromorphology Expert Group will be established to support the new National Hydromorphology Programme. This Expert Group will identify interim measures which will be readily implemented during the third RBMP cycle to assist in removing hydromorphological pressures.	The key action is the establishment of a Hydromorphology Expert Group to support the new National Hydromorphology Programme. The Expert Group will consist of members from the EPA, OPW, DECC, DAFM, Waterways Ireland, CCMA, LAWPRO, Teagasc, Uisce Éireann, ESB, NPWS and DHLGH (water and planning units) who will liaise with IFI in relation to their new National Barriers Mitigation Programme, and will oversee pilot projects/any actions arising from this plan. The group is chaired by DHLGH. The Expert Group will make recommendations in relation to interim measures that can be implemented during the third cycle RBMP. Consent for any proposals arising from the Hydromorphology Expert Group and the associated National Hydromorphology Programme must demonstrate that they can be implemented without adverse effects on the integrity of Special Areas of Conservation (SACs) or Special Protection Areas (SPAs). Where adverse effects from proposals remain following mitigation, in line with Habitats Directive Article 6(3), consent for the proposals cannot be granted unless the prerequisites set by Article 6(4) are met.
Hymo 2	**Hydromorph 1:** DHLGH to develop a new Controlled Activities for the Protection of Waters regime to address	DHLGH will lead the development of a new enhanced and consolidated legislative regime to address pressures on the physical condition of waters.	Action previously assessed as **Hydromorph 1** in draft RBMP NIS [see Section 6.4.5.2 above].

	pressures on the physical condition of waters.		
Hymo 3	**Hydromorph 2:** DHLGH to establish a restoration programme to mitigate the negative impact of past construction in or near water bodies.	DHLGH to IFI will establish a restoration programme to mitigate the negative impact of past construction in or near water bodies.	Action previously assessed as **Hydromorph 2** in draft RBMP NIS [see Section 6.4.5.2 above]. Restoration works are likely to include improvement to natural flood alleviation, riparian improvements, replacing hard infrastructure with a non-structural solutions, removals of weirs and de-culverting watercourse etc. all with the intention of returning rivers to as close to their natural state and function as possible. Broadly restoration measures are positive, however, there is potential for adverse effects on European sites, their QI/SCI and site integrity where connectivity to these sites and their conservation objectives under the Habitats Given that specific measures will be decided upon at a more local level the most appropriate stage at which to undertake such assessments is at the IFI level where ecological expertise to support communities is in place to undertake the assessments.
Hymo 4	*New action arising following Public Consultation*	A Sectoral Action for Hydromorphology will be developed, which will include measures and plans to address the 448 water bodies at risk from hydromorphology, including barriers, channelization, drainage, sediment and flood protection. It will be led and coordinated by DHLGH with supporting bodies IFI, DAFM, Forestry, OPW and DECC.	The key activity relates to the publication of a Sectoral Action Work Plan. This includes engagement with the Programme of Measures working group, review of Hydromorphology Work Plans, agreement on templates, data for input into Catchment Management Plans, data collation and tracking through annual reporting. **No significant adverse effects** foreseen on European sites, their QIs/SCIs, conservation objectives or site integrity.
Hymo 5	*New action arising following Public Consultation*	It is proposed that IFI will lead a multi-agency whole of catchment pilot project on the River Dodder from source to sea with	The key activity in relation to this action is an examination of the feasibility of multiple barrier mitigation on the River

		the aim of examining the feasibility of opening up this heavily urbanised catchment to migratory fish species by mitigating the five most significant barriers in the lower reaches and progressing to the next stage, as appropriate.	Dodder. This will include stakeholder engagement and feasibility studies to determine which options may be viable. Consent for any proposals arising from this feasibility work must demonstrate that they can be implemented without adverse effects on the integrity of Special Areas of Conservation (SACs) or Special Protection Areas (SPAs). Where adverse effects from proposals remain following mitigation, in line with Habitats Directive Article 6(3), consent for the proposals cannot be granted unless the prerequisites set by Article 6(4) are met.
Hymo 6	**Hydromorph 3:** A pilot project will be undertaken for the Annacotty weir in County Limerick to assist with the design and implementation of the national restoration programme.	IFI will lead a pilot project to be undertaken for the Annacotty Weir in County Limerick. The project will provide an opportunity to test a collaborative and ecology focussed design approach. It will also test enhanced community engagement opportunities that go beyond the standard consultation practices involved in the planning process, thereby assisting with the design and implementation of the national restoration programme. The pilot project is initially examining the feasibility of mitigation and will progress to the next stages, as appropriate.	The Annacotty Fish Passage Project is a complex project with multiple stages, some of which run in parallel. The project has been designated a pilot project to assist with the design and implementation of the national restoration programme by DHLGH. During this period of assessment, IFI will engage with stakeholders through workshops, webinars, the provision of information and other outreach initiatives to highlight the issues around the Annacotty Fish Passage Project. A range of studies will be undertaken to understand the effect of any change to the weir and its impact on river levels and flows downstream and upstream. The following reports have already been completed: • Archaeology; • Architectural Heritage; • Freshwater Pearl Mussel Survey; • Hydraulic Report; • Hydrology Report; • Topographical Bathymetric Survey; and • Underwater Archaeology.

			The following reports are outstanding and will be completed when the final design option has been decided: AA Screening, NIS and EcIA. All options for fish passage improvement at the weir will be fully assessed, including: complete removal, partial removal, bypass channel construction, rock-ramp fish pass construction and the 'do-nothing/status quo' scenario. These initial studies will also identify any ecological or engineering constraints that may influence the choice of final fish passage improvement option. When all the options for fish passage improvement have been fully assessed, IFI will organise another public meeting for stakeholders to present consultants' findings and recommendations and to hear the public's views. This will be done prior to the start of any planning permission process. General project stages: • Preliminary project work. • Formation of an interagency stakeholder group. This includes representatives from IFI, Limerick City and County Council, LAWPRO, NPWS, OPW, ESB, DECC and DHLGH. • Stakeholder Engagement and Public Information Events (ongoing). • Tendering for the environmental consultants and consulting engineers • Undertaking all technical and environmental assessments. • Review of reports and decision matrix • Presentation of the preferred options to stakeholders. • Application for planning permission to Limerick City and County Council for the final agreed design. • Tendering for the construction stage of the final agreed design. • The construction stage of the project during the environmental window.

			• Commissioning of the new fish pass improvement works. Consent for any proposals arising from this process must demonstrate that they can be implemented without adverse effects on the integrity of Special Areas of Conservation (SACs) or Special Protection Areas (SPAs). Where adverse effects from proposals remain following mitigation, in line with Habitats Directive Article 6(3), consent for the proposals cannot be granted unless the prerequisites set by Article 6(4) are met.
Hymo 7	**Hydromorph 4:** DHLGH to oversee the implementation of the roadmap of actions to improve fish migration in the lower Shannon at the Hydroelectric scheme located around Parteen and Ardnacrusha.	Implementation of the roadmap of actions, including the use of state-of-the-art technical solutions, to improve fish migration in the lower Shannon at the Hydroelectric scheme located around Parteen and Ardnacrusha. The pilot project will initially examine the feasibility of mitigation and will progress to the next stages, as appropriate.	The intention of the measures is to implement the roadmap of actions to improve fish migration in the Lower Shannon in the vicinity of Parteen and Ardnacrusha, beginning with initial examination of the feasibility of any mitigation proposed prior to progressing any works. The Lower River Shannon is designated as a Special Area of Conservation [site code: 002165] and a Special Protection Area [site code: 004077]. The QIs, SCIs and their Conservation Objectives have been directly referenced at the NPWS website: https://www.npws.ie/protected-sites/sac/002165 https://www.npws.ie/protected-sites/spa/004077 The roadmap of actions is not part of the RBMP. The supporting text in the RBMP notes that a multi-agency steering group was established in 2018 by the then Minister, to prepare recommendations for improvements to fish passage in the lower Shannon catchment. This has now resulted in the development of a draft roadmap of actions, which received Ministerial approval in 2022. The roadmap is ambitious and innovative and sets out a programme of initial investment measures which are intended to make a significant improvement to free passage for fish at Ardnacrusha and Parteen Weir in the short-term,

			while providing the platform for long-term enhancement of the ecology and environment of the Lower Shannon and consequently, the environmental sustainability of the Shannon Hydro-electric Scheme. The first steps proposed by this action and arising from the roadmap relate to a number of feasibility studies to assess the potential options for both up- and downstream fish passage, an environmental flow 'Eflow' regime and a management plan for the Lower River Shannon. Notwithstanding the fact that the roadmap of actions is not included in the RBMP, a number of pathways of potential impacts are noted: • Increased ecological connectivity as a result of removal of barriers to movement– this will have direct and positive effects on lamprey, salmon and otter in particular with indirect positive impacts for Freshwater Pearl Mussel which rely on Salmon for their life cycle. • Altered hydrology leading to changes in sedimentation/erosion – this could result in indirect negative impacts on Otter if couches/holts are affected by the changes. This could also impact negatively on some QI habitats, notably Alluvial forests with alder *Alnus glutinosa* and ash *Fraxinus excelsior*. Any alteration to the hydrological regime could adversely affect the habitat, which requires periodic flooding to support its favourable conservation status. • Increased tourism and recreation – as a consequence of the removal of barriers at these locations, it is anticipated that there will be increased opportunities for tourism and recreation associated with fishing in particular. This has the potential to adversely impact on QI through disturbance, e.g. Otters using the riverine area, spread of invasive species through boats or equipment.

			• In-combination effects – the Lower Shannon is the focus of much activity associated with recreation, industry, energy, water supply etc. As such, any changes proposed to the hydrologic regime need to be modelled in the context of these other pressures to ensure that cumulative effects are understood before any actions are rolled out. The current situation at Parteen and Ardnacrusha reduces ecological connectivity in the Shannon with issues for a number of the QI. Improvements in the movement of lamprey and salmon in particular and restoration of the river to a more natural condition will contribute to achieving favourable conservation status for the species and habitats associated with the Lower Shannon SAC and the River Shannon and River Fergus Estuaries SPA. Notwithstanding this, other QI and SCI associated with the Lower Shannon have the potential for negative effects if they are not considered in the overall solution. This includes the potential for negative effect on the alluvial woodland QI due to any hydrological changes associated with a new 'Eflow' regime. The actions once developed shall undergo screening for AA and preparation of an NIS, supported by hydrological modelling if required, to determine if the actions will have adverse effects on any QI/SCI or site integrity and inform the formal determination on AA. All actions proposed will also be informed by ecological impact assessment to ensure no unintended consequences on wider supporting biodiversity. Consent for any proposals arising from this feasibility work must demonstrate that they can be implemented without adverse effects on the integrity of Special Areas of Conservation (SACs) or Special Protection Areas (SPAs). Where adverse effects from proposals remain following mitigation, in line with Habitats Directive Article 6(3), consent for the proposals cannot be granted unless the prerequisites set by Article 6(4) are met.

Hymo 8	*New action arising following Public Consultation*	A proposed pilot project on the Slaney River at Clohamon will aim to improve fish passage at a medium scale hydroelectric scheme through a state and community collaborative initiative. The pilot project will initially examine the feasibility of mitigation and will progress to the next stages, as appropriate.	The key activity is the examination of the feasibility of mitigation, which will progress to the next stages if appropriate. It will include stakeholder engagement and feasibility studies. The Slaney Rivers Trust is preparing a revised design for a proposed rock ramp to improve fish passage (suitable for all species) at Clohamon Weir, following hydrometric study undertaken by the EPA to address flow ratios. Separately, a planning application (including Appropriate Assessment) was submitted to replace the tailrace barrier at Clohamon and reduce the screen size to 20 mm to prevent most adult fish species from entering the tailrace. Slaney River Trust engaged with NPWS during preparation of the planning application and were advised to undertake additional ecological survey work to support Appropriate Assessment, including mitigation measures required. All surveys have been completed. Consent for any proposals arising from this feasibility work must demonstrate that they can be implemented without adverse effects on the integrity of Special Areas of Conservation (SACs) or Special Protection Areas (SPAs). Where adverse effects from proposals remain following mitigation, in line with Habitats Directive Article 6(3), consent for the proposals cannot be granted unless the prerequisites set by Article 6(4) are met.
Hymo 9	*New action arising following Public Consultation*	In addition to river barrier removal and mitigation other restoration and mitigation work will be developed. This will be partly guided by the framework for prioritising measures for both river restoration and Nature-based Catchment Management prepared by the EPA.	The key activity in relation to this action is the initial scoping and identification of other hydromorphological pressures on water quality, to include a report with recommendations. This will be led by DHLGH with support from a number of key stakeholders and the NPWS.

			No significant adverse effects foreseen on European sites, their QIs/SCIs, conservation objectives or site integrity.
3.10 repeat (as above)	**Action 3.3(1):** Undertake a technical review and public consultation on the designation of Heavily Modified Water Bodies.	The Minister for Housing, Local Government and Heritage will undertake a short public consultation before deciding whether to designate or de-designate water bodies as HMWBs. There were 466 water bodies, which the EPA has found to meet the criteria for designation. The Minister will take into account the recommendations of the EPA and the key concerns raised in the submissions to the consultation process.	Action 3.10 assessed above.
3.11 repeat (as above)	*New action arising following Public Consultation*	A review of arterial drainage requirements and the underpinning Arterial Drainage Act will be undertaken in order to inform future land use policy decisions arising out of the Land Use Review and to support the preparations for the implementation of the new Nature Restoration Law and the Heavily Modified Water Body review process.	Action 3.11 assessed above.

7.2.5.2.3 Forestry

RBMP Action No.	Draft RBMP Action No. and Wording	Final RBMP Action Wording [Blue text / strikethrough denotes significant changes]	Assessment of Effects and Requirement for Mitigation
Forestry 1	*New action arising following Public Consultation*	In support of the Catchment Management Work Plans, the Department of Agriculture, Food and the Marine will publish a Sectoral Action Work Plan. DAFM will update the 2018 document "*Forests and Water: Achieving Objectives under Ireland's River Basin Management Plan 2018-2021*" as the	The key activity relates to the publication of a Sectoral Action Work Plan and the updating of the 2018 document "*Forests and Water: Achieving Objectives under Ireland's River Basin Management Plan 2018-2021*" as the Forestry Sectoral Action Work Plan. This includes a number of administrative steps relating to resourcing, training, review

		Forestry Sectoral Action Work Plan supporting the third RBMP.	of work plans, data for input into Catchment Management Plans, data collation and tracking through annual reporting. **No significant adverse effects** foreseen on European sites, their QIs/SCIs, conservation objectives or site integrity.
Forestry 2	*New action arising following Public Consultation*	DAFM recognises the key recommendation from the HYDROFOR Project (2016) to "cease afforestation on peat soils in acid-sensitive headwater catchments", and is applying various water and non-water related policies, procedures and protocols that combine to rule out afforestation on such sites, or to limit it to appropriate multi-benefit native woodland.	The key activity in relation to this action is the application of various state aid rules underpinning the forestry programme (e.g. new soil type and fertility requirements, the exclusion of afforestation from undesignated Annex I habitats, SPAs and wetland habitats) and existing procedures and protocols (e.g. AA and protocol for acid sensitive areas). This will be broadly positive for the environment and for European sites, including undesignated Annex I habitats and wetland habitats. **No significant adverse effects** foreseen on European sites, their QIs/SCIs, conservation objectives or site integrity.
Forestry 3	**Forestry 2:** Increase the area of forests with appropriate water setbacks through the ongoing restructuring of existing forest stands at clear fell/reforestation stage to incorporate appropriate water setbacks.	DAFM to increase the area of forests with appropriate water setbacks through the ongoing restructuring of existing forest stands at clearfell / reforestation stage.	Action previously assessed as **Forestry 2** in draft RBMP NIS [see Section 6.4.5.3 above].
Forestry 4	**Forestry 3:** Ensure the application of water setbacks and other water-based protection during the creation of new forests, principally under the Afforestation Grant & Premium Scheme.	DAFM to ensure the application of water setbacks and other water-based protection during in all new forests, principally realised with support under the 2023 – 2027 Afforestation Scheme.	Action previously assessed as **Forestry 3** in draft RBMP NIS [see Section 6.4.5.3 above].
Forestry 5	**Forestry 4:** Manage the application of support measures that have a clear application in relation to the protection of water, including: the Continuous Cover	DAFM to manage the application of support measures that have a clear role in relation to the protection of water, including: the Continuous Cover Forestry Scheme; the	Action previously assessed as **Forestry 4** in draft RBMP NIS [see Section 6.4.5.3 above].

	Forestry Scheme; the native woodland and agri-forestry options under the Afforestation Scheme, and the Native Woodland Conservation Scheme.	various native woodland and agri-forestry options under the Afforestation Scheme, the Native Woodland Conservation Scheme, and the Reforestation for Climate Resilience Scheme.	
Forestry 6	**Forestry 5:** Encourage uptake of the recently-revised Woodland Creation on Public Lands Scheme to deliver woodland-based solutions for the protection of drinking water sources and water in general.	DAFM to encourage the uptake of the Forest Type 3 under the Afforestation Scheme, aimed at funding native woodland creation on public land, specifically to deliver woodland-based solutions for the protection of drinking water sources and water in general.	Action previously assessed as **Forestry 5** in draft RBMP NIS [see Section 6.4.5.3 above].
Forestry 7	*New action arising following Public Consultation*	DAFM to launch the new Forests for Water option (Forest Type 2) under the Afforestation Scheme, which offers added incentives to farmers and other landowners to promote the creation of new native forests specifically to provide water services, including improvements to water quality, drinking water source protection, natural water retention, the improvement of aquatic and riparian habitats, and the expansion of alluvial woodland.	The aim of Forest Type 2 – Forests for Water is to create new native forests in strategic locations where this land use change would deliver specific ecosystem services, including the protection of water and aquatic ecosystems. It also aims to reinforce and expand areas of alluvial forests. Applications must meet one of the following targeted objectives in order to be considered eligible: • Plant in areas identified as Rank 1-3 on the EPA Pollution Impact Potential (PIP) Maps for phosphorus to break the pathway and protect the delivery point to the receiving aquatic zone. • Plant in areas identified by LAWPRO or ASSAP, for Native Forest creation as a mitigation. • Plant in areas identified by Uisce Éireann or the National Federation of Group Water Schemes for drinking water source protection. • Plant in areas suitable for Natural Water Retention Measures. Such areas are in the process of being identified by the Office of Public Works (OPW). • Plant in areas identified by Inland Fisheries Ireland for improvement of fisheries habitat and stream ecology. • Plant to facilitate the expansion of the Habitats Directive Annex I Habitat: Alluvial Woodland 91EO.

			All of the targeted objectives will result in positive environmental effects, notably for water. In particular, there will be a positive effect for Alluvial Woodland if the scheme facilitates its expansion. In addition, there is an Environmental Report Grant which will be paid if a report from an ecologist or archaeologist is submitted. Nothwithstanding this, planting of trees can give rise to potential negative impacts for biodiversity including: release of nutrients/suspended solids to freshwater, estuarine and coastal habitats with direct negative impacts on biodiversity including highly sensitive species such as the Freshwater Pearl Mussel (FPM) and sensitive habitats such as fish spawning and nursery areas. As Forestry Type 2 sits under the Afforestation Scheme, there are a number of additional requirements including application of the *Forestry Standards Manual, Environmental Requirements for Afforestation and the Land Types for Afforestation*[30]. This manual includes the requirement for EIA and AA screening as part of the application for pre-planting approval. DAFM provided a template document for applicants and registered foresters within to submit an AA screening report to DAFM in respect of a forestry licence and/or scheme approval as part of Circular 13 of 2020[31]. Documentation including any mitigation measures arising from the AA process must be submitted prior to grant receipt. All applications for afforestation approval under the Afforestation Scheme 2023-2027 will undergo an environmental assessment procedure. All applications submitted to DAFM will be subject to AA.

[30] Forestry Standards Manual, Working Document v.08Nov23, Department of Agriculture, Food and the Marine.

[31] Government Circular 13 of 2020.

Forestry 8	**Forestry 7:** Continue to address all forestry-related water incidents, as identified by DAFM Inspectors or reported to DAFM by foresters, water agencies, NGOs and members of the public. **Forestry 8:** Further engagement between DAFM and other parties on forestry-related issues, both within the existing WFD structures and forums, and bilaterally (e.g. with Inland Fisheries Ireland).	DAFM to continue to address all forestry related water incidents, as identified by DAFM Inspectors and LAWPRO or reported to DAFM Forestry by foresters, water agencies, environmental NGOs and members of the public. ~~**Forestry 8:** Further engagement between DAFM and other parties on forestry-related issues, both within the existing WFD structures and forums, and bilaterally (e.g. with Inland Fisheries Ireland).~~	Action previously assessed as **Forestry 7** in draft RBMP NIS [see Section 6.4.5.3 above]. Duplication in actions removed.
Forestry 9	**Forestry 9:** Deliver further training of Registered Foresters and Consultant Ecologists and of Department Forestry Inspectors and Ecologists, in relation to the design, assessment and implementation of forestry projects from the perspective of the protection environment, including water.	DAFM to train Registered Foresters, Consultant Ecologists and machine operators in relation to the design, and implementation of forestry projects, from the perspective of protecting and enhancing receiving waterways.	Action previously assessed as **Forestry 9** in draft RBMP NIS [see Section 6.4.5.3 above].
Forestry 10	**Forestry 1:** Continue to seek improvements to the licence applications process for key forestry activities.	Continue to seek improvements to the licence applications process for key forestry activities.	Action previously assessed as **Forestry 1** in draft RBMP NIS [see Section 6.4.5.3 above].
Deleted	**Forestry 6:** Roll-out the Woodland for Water Scheme which is focused on strategically realising native woodland in areas where such features would have a marked impact in relation the protection of water.	**Forestry 7:** DAFM to launch the new Forests for Water option (Forest Type 2) under the Afforestation Scheme, which offers added incentives to farmers and other landowners to promote the creation of new native forests specifically to provide water services, including improvements to water quality, drinking water source protection, natural water retention, the improvement of	Action previously assessed as **Forestry 6** in draft RBMP NIS [see Section 6.4.5.3 above]. Amalgamated with Forestry 7.

		aquatic and riparian habitats, and the expansion of alluvial woodland. ~~**Forestry 6:** Roll-out the Woodland for Water Scheme which is focused on strategically realising native woodland in areas where such features would have a marked impact in relation the protection of water.~~	

7.2.5.2.4 Urban Wastewater

RBMP Action No.	Draft RBMP Action No. and Wording	Final RBMP Action Wording [Blue text / strikethrough denotes significant changes]	Assessment of Effects and Requirement for Mitigation
UWW 1	**UWW 1:** Continue investment in wastewater infrastructure with Irish Water investing in 83 wastewater treatment plants and 10 collection networks at an estimated cost of €1.022bn, over the period 2020-2024.	Uisce Éireann will continue investment in wastewater infrastructure investing over €2.3bn over the period 2020-2024. This includes 108 wastewater treatment plants and 77 collection networks at an estimated cost of €1.542bn and 92 national programmes at an estimated cost of €780m.	Action previously assessed as **UWW 1** in draft RBMP NIS [see Section 6.4.5.4 above]. Any plans or projects arising from Uisce Éireann investment will be subject to Appropriate Assessment, at such time as they are known. Consent for any proposals arising from this investment by Uisce Éireann must demonstrate that they can be implemented without adverse effects on the integrity of Special Areas of Conservation (SACs) or Special Protection Areas (SPAs). Where adverse effects from proposals remain following mitigation, in line with Habitats Directive Article 6(3), consent for the proposals cannot be granted unless the prerequisites set by Article 6(4) are met. It is noted that the legal tests in relation to Appropriate Assessment do not allow for cost / economic as a reason to consent or permit adverse effects on any European site.

UWW 2	*New action arising following Public Consultation*	Uisce Éireann will deliver infrastructure projects as set out in the Appendices for the next RBMP 3rd cycle (2022-2027).	The release of raw or poorly treated sewage can have negative effects on water quality including enrichment. This can cause excessive growth in aquatic flora which changes the water ecosystem characteristics by reducing light availability, increasing amounts of organic matter and causing an unstable amount of dissolved oxygen. This brings aquatic ecosystem functioning imbalances and leads to eutrophication. The eutrophication mechanism leads to a chain reaction, notably a change in the structure of biological communities and trophic networks, as well as changes in biogeochemical cycles. Such conditions endanger many aquatic fauna, leading in the long-term changes in habitats. Continued investment in waste water infrastructure is considered positive as it reduces the incidence of raw or poorly treated waste water entering lakes, rivers, estuarine or marine waters which may be designated as European sites or have direct or indirect connectivity to such sites, their QI or SCI. As with provision of any infrastructure, there is potential for direct and indirect negative effects on the receiving environment as a result of land use change, destruction of habitat, disturbance or habitats or species and changes in environmental parameters as a result of emissions to water, soil or air. The effects are dependent on the nature of the infrastructure, the sensitivity of the receiving environment and the connectivity to designated sites, their QI or SCI. Wastewater infrastructure is subject to planning and / or licensing of discharges. Both will require AA to inform decision making by the relevant competent authority thereby avoiding and / or mitigating the risk of any adverse effects.
UWW 3	*New action arising following Public Consultation*	Uisce Éireann will assess urban wastewater requirements for the 197 water bodies where urban wastewater has been identified as a significant pressure by 2027, including	The EPA has identified 197 water bodies where urban wastewater has been identified as a significant pressure. The key activity related to this measure is the assessment of what is required for these water bodies to remove urban wastewater as a significant pressure by 2027 with a view to

		any new significant pressure water bodies identified by LAWPRO.	removing the pressure. This will ultimately be positive for water quality as the specific issues are identified and addressed. This may require the upgrading or provision of infrastructure by Uisce Éireann. As with provision of any infrastructure, there is potential for direct and indirect negative effects on the receiving environment as a result of land use change, destruction of habitat, disturbance or habitats or species and changes in environmental parameters as a result of emissions to water, soil or air. The effects are dependent on the nature of the infrastructure, the sensitivity of the receiving environment and the connectivity to designated sites, their QI or SCI. Wastewater infrastructure is subject to planning and / or licensing of discharges. Both will require AA to inform decision making by the relevant competent authority thereby avoiding and / or mitigating the risk of any adverse effects.
UWW 4	**UWW 3:** EPA to carry out a review of Wastewater Discharge Licences	Uisce Éireann will apply for reviews of Waste Water Discharge Authorisations, where required. The applications shall be in a timeframe that is appropriate to the delivery programme and agreed with the EPA.	The key activity is the review of Waste Water Discharge Authorisations. Review of licences will be initiated by the Agency where Uisce Éireann propose to increase wastewater capacity in support of social and economic growth. The review of licences in response to changing circumstance is a positive protective measure. **No significant adverse effects** foreseen on European sites, their QIs/SCIs, conservation objectives or site integrity.
UWW 5	**UWW 4:** Deliver a multi-annual investment programme to provide wastewater infrastructure for unsewered villages	DHLGH will deliver a multi-annual investment programme to provide wastewater infrastructure for villages not served by public wastewater collection systems.	Action previously assessed as **UWW 4** in draft RBMP NIS [see Section 6.4.5.4 above].

UWW 6	**UWW 5:** Irish Water River Basin Management Plan – Enhanced Ambition Programme to advance priority wastewater treatment plant projects whose discharges have been identified as being significant pressures on water bodies and impacting on WFD objectives.	Uisce Éireann's River Basin Management Plan – Enhanced Ambition Programme will deliver at least 10 new wastewater treatment plant upgrades not funded under the current investment plan where discharges have been identified as being significant pressures on water bodies and impacting on WFD objectives.	Action previously assessed as **UWW 5** in draft RBMP NIS [see Section 6.4.5.4 above]. Any plans or projects arising from Uisce Éireann's Enhanced Ambition Programme will be subject to Appropriate Assessment, at such time as they are known. Consent for any proposals arising from this investment by Uisce Éireann must demonstrate that they can be implemented without adverse effects on the integrity of Special Areas of Conservation (SACs) or Special Protection Areas (SPAs). Where adverse effects from proposals remain following mitigation, in line with Habitats Directive Article 6(3), consent for the proposals cannot be granted unless the prerequisites set by Article 6(4) are met. It is noted that the legal tests in relation to Appropriate Assessment do not allow for cost / economic as a reason to consent or permit adverse effects on any European site.
UWW 7	*New action arising following Public Consultation*	Uisce Éireann will continue investment in storm water overflows with a minimum of 139 upgrades over the period 2022-2027.	The key activity in relation to this measure is continued investment in storm water overflows during the RBMP cycle. This will have positive effects on water quality and biodiversity generally. Notwithstanding the positive impacts through improved water quality, construction can lead to negative effects on European sites, their QI and SCI through habitat loss and disturbance, species disturbance and changes in environmental quality through emissions to air, water or soil. Consent for any upgrades arising from this investment by Uisce Éireann must demonstrate that they can be implemented without adverse effects on the integrity of Special Areas of Conservation (SACs) or Special Protection Areas (SPAs). Where adverse effects from proposals remain following mitigation, in line with Habitats Directive Article 6(3), consent for the proposals cannot be granted unless the prerequisites set by Article 6(4) are met.

UWW 8	**UWW 6:** Complete negotiations and transposition into Irish law of the recast Urban Waste Water Treatment Directive	Following the completion of negotiations, DHLGH will undertake transposition into Irish law of the recast Urban Waste Water Treatment Directive.	Action previously assessed as **UWW 6** in draft RBMP NIS [see Section 6.4.5.4 above]. Action updated to account for transposition into Irish law of the recast directive. **No significant adverse effects** foreseen on European sites, their QIs/SCIs, conservation objectives or site integrity.
UWW 9	**UWW 7** Ensure development of any new standards for Combined Storm Overflows emerging from an update to the Urban Waste Water Treatment Directive.	Following the expected recast Urban Waste Water Treatment Directive the DHLGH will update the criteria for the performance of Combined Storm Water Overflows.	The key activity in relation to this measure will be development of new standards for Combined Storm Overflows. **No significant adverse effects** foreseen on European sites, their QIs/SCIs, conservation objectives or site integrity.
UWW 10	*New action arising following Public Consultation*	Uisce Éireann will put in place a Research and Innovation Programme on nature based solutions for small wastewater treatment plants.	The key activity relates to a research and innovation programme. **No significant adverse effects** foreseen on European sites, their QIs/SCIs, conservation objectives or site integrity.
UWW 11	*New action arising following Public Consultation*	As part of the distance to target analysis process led by the EPA, the impact of Sectoral Action Work Plans, including that for urban wastewater discharges, will be assessed as part of the preparation of the 46 Catchment Management Work Plans. Uisce Éireann will publish a Sectoral Action Work Plan. The Sectoral Action Work Plan for urban wastewater discharges will include further detailed information on the targeting of measures to address the 197 water bodies at risk from urban wastewater discharges during the third cycle.	The key activity relates to the publication of a Sectoral Action Work Plan. This includes a number of administrative steps relating to engagement with the Programme of Measures Working Group, agreement on templates, data for input into Catchment Management Plans, data collation and tracking through annual reporting. **No significant adverse effects** foreseen on European sites, their QIs/SCIs, conservation objectives or site integrity.

UWW 12	*New action arising following Public Consultation*	Uisce Éireann to engage with LAWPRO with the data required for their work in compiling the 46 catchment plans and also trialling the Catchment Management Plans template in the 5 pilot catchments.	The key activity relates to engagement with implementing bodies in the development of the CMPs to provide information as required for catchment plans and pilot catchment areas. **No significant adverse effects** foreseen on European sites, their QIs/SCIs, conservation objectives or site integrity.
UWW 13	**UWW 8:** Continue to develop and update the Gap Analysis as a tool to deliver environmental benefits for infrastructural planning.	Continue to develop and update the Gap Analysis as a tool to reflect UÉ's understanding of future needs, and consequent investment requirements.	Action previously assessed as **UWW 8** in draft RBMP NIS [see Section 6.4.5.4 above].
UWW 14	**UWW 9:** Update the Nutrient Sensitive Areas designations under the Urban Waste Water Treatment Directive.	Transpose the updated Nutrient Sensitive Areas designations under the Urban Wastewater Treatment Directive.	Action previously assessed as **UWW 9** in draft RBMP NIS [see Section 6.4.5.4 above]. The key action update in the final plan relates to transposition of same.
Deleted	**UWW 2:** DHLGH to ensure ongoing engagement with Irish Water on the requirements for the next investment period (2025-2029).	~~**UWW 2:** DHLGH to ensure ongoing engagement with Irish Water on the requirements for the next investment period (2025-2029).~~ This measure has been captured by detail in other UWW measures.	N/A

7.2.5.2.5 Urban Runoff Pressures

RBMP Action No.	Draft RBMP Action No. and Wording	Final RBMP Action Wording [Blue text / strikethrough denotes significant changes]	Assessment of Effects and Requirement for Mitigation

Urban Runoff 1	**Urban Runoff 1:** Develop recommendations for an implementation strategy for nature based Sustainable Urban Drainage Systems on a national scale	LAWPRO in conjunction with DHLGH to develop recommendations for an implementation strategy for nature based Sustainable Urban Drainage Systems on a national scale.	Action previously assessed as **Urban Runoff 1** in draft RBMP NIS [see Section 6.4.5.5 above].
Urban Runoff 2	**Urban Runoff 2:** Provide interim guidance documentation to the Local and Planning Authorities on measures to be implemented to support the delivery of a greater focus on nature based solutions in advance of a national implementation strategy.	DHLGH to provide interim guidance documentation to the Local and Planning Authorities on measures to be implemented to support the delivery of a greater focus on nature based solutions in advance of a national implementation strategy. [Note: The interim guidance was delivered in Q4 2021].	Action previously assessed as **Urban Runoff 2** in draft RBMP NIS [see Section 6.4.5.5 above].
Urban Runoff 3	*New action arising following Public Consultation*	Develop a National Implementation Strategy for Nature based Sustainable Urban Drainage Systems on a national scale.	The key action relates to the drafting of an implementation strategy based on the views of key stakeholders and the rollout of that strategy. This strategy will undergo AA, when drafted. **No significant adverse effects** foreseen on European sites, their QIs/SCIs, conservation objectives or site integrity.
Urban Runoff 4	**Urban Runoff 5:** Establish a programme for the modelling and monitoring of rainwater run-off and overflows.	DHLGH to establish a pilot project to investigate solutions to urban runoff using Nature-based Solutions.	The Nature-based Solutions (NBS) pilot projects are providing Irish based research on urban runoff. The projects include initial monitoring of potential sites, design of appropriate NBS features and monitoring after the feature is in place. The monitoring will include quality and quantity information for future analysis. In some circumstances demonstrator projects will be undertaken to provide locations for the monitoring. The projects are aiming to show how NBS can be retrofitted into long established urban areas to improve water quality, biodiversity and place-making. The location of the pilot projects will be within urban areas with existing urban runoff pressures.

			The output of this action will be a final report on the performance of NBS to mitigate urban runoff, which can then be used to inform policy and decision-making. **No significant adverse effects** foreseen on European sites, their QIs/SCIs, conservation objectives or site integrity.
Urban Runoff 5	*New action arising following Public Consultation*	Additional resources will be provided to LAWPRO to provide specialist support to local authorities in adopting international best practice on nature-based surface water management within planning and infrastructure project delivery.	This action relates to the provision of additional specialist resources, which is broadly positive for European sites as it will facilitate the adoption of best practice in nature-based surface water management within planning and infrastructure project delivery. **No significant adverse effects** foreseen on European sites, their QIs/SCIs, conservation objectives or site integrity.
Urban Runoff 6	*New action arising following Public Consultation*	The DHLGH will work with NIEA to seek Peace Plus funding projects, which will trial Nature-based Solution measures and sustainable technologies.	The key action relates to seeking projects to trial Nature-based Solutions. The DHLGH and NIEA, with the support of the EPA will coordinate the technical aspects of a proposal for inclusion in the next call of Peace Plus. **No significant adverse effects** foreseen on European sites, their QIs/SCIs, conservation objectives or site integrity.
Urban Runoff 7	*New action arising following Public Consultation*	Review of outcomes of the Dublin Urban Rivers Life project	The Dublin Urban Rivers Lie Project aims to improve water quality and aquatic biodiversity in urban areas by finding domestic misconnections and by building wetlands in public parks to treat and improve water quality. The mitigation of untreated urban wastewater and domestic misconnections discharges to aquatic environments is fundamental in achieving WFD objectives. The key activity is the review of the outcomes of this research project with a view to informing future policy.

			No significant adverse effects foreseen on European sites, their QIs/SCIs, conservation objectives or site integrity.
Urban Runoff 8	**Urban Runoff 6:** Oversee the preparation of integrated urban drainage management plans	Oversee the preparation of integrated urban drainage management plans.	Action previously assessed as **Urban Runoff 6** in draft RBMP NIS [see Section 6.4.5.5 above].
Moved to Chapter 3	**Urban Runoff 3**The National Bathing Water Expert Group to undertake a project to determine the most suitable approach to protecting bathers' health outside of the current bathing season in Dublin Bay	~~The National Bathing Water Expert Group to undertake a research project to determine the most suitable approach to protecting bathers' health outside of the current bathing season in Dublin Bay.~~ Action moved to Chapter 3	N/A
Moved to Chapter 3	**Urban Runoff 4:** DHLGH to amend the existing Bathing Water Regulations (S.I. No. 79 of 2008) to provide discretion to local authorities on determining the bathing season for individual bathing waters.	~~DHLGH to amend the existing Bathing Water Regulations (S.I. No. 79 of 2008) to provide discretion to local authorities on determining the bathing season for individual bathing waters.~~ Action moved to Chapter 3	N/A

7.2.5.2.6 Domestic Wastewater Discharges (Septic Tanks)

RBMP Action No.	Draft RBMP Action No. and Wording	Final RBMP Action Wording [Blue text / strikethrough denotes significant changes]	Assessment of Effects and Requirement for Mitigation
Domestic WW1	**Domestic Ww 1**: In line with the programme for government commitment to 'continue to help fund upgrades to domestic wastewater treatment systems, DHLGH will continue to monitor the	DHLGH will continue to promote and monitor the uptake of the new grant schemes to ensure adequate numbers of people are availing of this measure. A research project will be initiated under the	Action previously assessed as **Domestic Ww 1** in draft RBMP NIS [see Section 6.4.5.6 above].

	uptake of the new grant schemes to ensure adequate numbers of people are availing of this measure. A research project will be initiated under the ESRI Research Programme on behaviours and attitudes to assess the level of uptake, impediments to uptake and to make recommendations for improving uptake.	ESRI Research Programme on behaviours and attitudes to assess the level of uptake, impediments to uptake and to make recommendations for improving uptake.	
Domestic WW2	**Domestic Ww 2:** A review of the National Inspection Plan (NIP) 2018-2021 to be completed, with the outcome informing the next NIP for the period 2022-2027. An objective of these plans is to prioritise inspections to areas of greatest environmental and public health risk and secure upgrading works where required.	A review of the National Inspection Plan (NIP) 2018-2021 was completed, with the outcome informing the next NIP for the period 2022-2027. An objective of these plans is to prioritise inspections to areas of greatest environmental and public health risk and secure upgrading works where required.	Action previously assessed as **Domestic Ww 2** in draft RBMP NIS [see Section 6.4.5.6 above].
Domestic WW3	*New action arising following Public Consultation*	Local authorities to engage with householders to improve general awareness of septic tank maintenance requirements, and to address any failing septic tanks.	Septic tanks are a major cause of diffuse pollution to surface and ground water bodies, particularly in rural areas and are impacting on water quality in surface and groundwater particularly in areas of low soil permeability. This is largely due to lack of maintenance of systems. This pollution causes nutrient enrichment of water bodies and contamination of drinking water sources in some cases. Poorly performing or maintained domestic wastewater treatment systems are highlighted as a significant pressure on Ireland's environment (EPA November 2020). This measure relates to improving awareness of septic tank maintenance requirements with householders and addressing any failing septic tanks. Addressing these failures will generally have positive effects for water quality and water dependant ecosystems which are at risk from failing or deteriorating domestic wastewater treatment systems and which have connectivity to European sites.

			This will be particularly the case for high status waters and European sites under the WFD Protected Areas. Where upgrades or new systems are required, there is potential for direct, indirect, construction, operational and cumulative effects on European sites in the absence of mitigation measures. Any consent and/or licensing associated with such upgrades must be subject to AA.
Domestic WW4	*New action arising following Public Consultation*	Local authorities to complete 5,800 inspections between 2022 and 2026 under the National Inspection Plan.	The key activity in relation to his action is completion of a target of 5,800 inspections between 2022 and 2026. This will include resources in local authorities that are clearly ring-fenced for this action. Inspections will be planned and completed each year as set out in the National Inspection Plan. This will increase the level of compliance and result in positive environmental benefits, including for water quality. **No significant adverse effects** foreseen on European sites, their QIs/SCIs, conservation objectives or site integrity.
Domestic WW5	*New action arising following Public Consultation*	The DHLGH to issue a policy direction to Local Authorities regarding Advisory Notices and Local authorities to enforce advisory notices issued under the National Inspection Plan.	The key activity relates to the issuing of advisory notice to local authorities. Local authorities will also ring-fence resources for this action. Enforcement will be progressed in line with the Water Services Act and the National Inspection Programme and activities will be documents and an annual report sent to DHLGH and the EPA. This may result in a positive impact on water quality. **No significant adverse effects** foreseen on European sites, their QIs/SCIs, conservation objectives or site integrity.
Domestic WW6	**Domestic Ww 3:** DHLGH to consider the outcomes of the research project into the application of zero discharge nature	DHLGH to consider the outcomes of the research project into the application of zero discharge nature based solutions and their	Action previously assessed as **Domestic Ww 3** in draft RBMP NIS [see Section 6.4.5.6 above].

	based solutions and their applicability or not within Ireland's climatic conditions.	applicability or not within Ireland's climatic conditions.	
Domestic WW7	**Domestic Ww 4:** Review the outcomes of the pilot projects under the first multi-annual Developer-Provided Water Services Infrastructure Resolution Programme to inform future policy considerations on resolving sub-standard developer provided infrastructure with sustainable solutions.	Review the outcomes of the pilot projects under the first multi-annual Developer-Provided Water Services Infrastructure Resolution Programme to inform future policy considerations on resolving sub-standard developer provided infrastructure with sustainable solutions.	Action previously assessed as **Domestic Ww 4** in draft RBMP NIS [see Section 6.4.5.6 above].

7.2.5.2.7 Unknown Pressures

RBMP Action No.	Draft RBMP Action No. and Wording	Final RBMP Action Wording [Blue text / strikethrough denotes significant changes]	Assessment of Effects and Requirement for Mitigation
Unknown 1	**Unknown 1:** The Local Authority Waters Programme will conduct assessments of water bodies with unknown pressures in priority areas for action to identify the significant pressures in these areas with a high level of confidence.	The Local Authority Waters Programme (LAWPRO) will conduct assessments of water bodies in Priority Areas for Action where the pressures are unknown to identify the specific issues and actions that are required to protect or restore water quality as necessary.	The key activity will be to conduct assessments of water bodies with unknown pressures in priority areas for action. **No significant adverse effects** foreseen on European sites, their QIs/SCIs, conservation objectives or site integrity.
Unknown 2	**Unknown 2:** Each local authority will conduct assessments of water bodies with unknown pressures (those not within priority areas for action) to identify the significant pressures in these areas with a high level of confidence.	Each local authority supported by LAWPRO will conduct assessments of other water bodies where the pressures are unknown (which are not within priority areas for action) to identify the specific issues and actions that are required to protect or restore water quality as necessary.	The key activity will be to conduct assessments of water bodies with unknown pressures (those not within priority areas for action). **No significant adverse effects** foreseen on European sites, their QIs/SCIs, conservation objectives or site integrity.

Unknown 3	**Unknown 3:** The Local Authority Environmental Services National Training Group (LAESNTG) will provide a training programme for catchment assessment and Integrated Catchment Management for the staff of local authorities and all implementing bodies.	The Local Authority Services National Training Group (LASNTG) will provide appropriate training programmes including on Catchment assessment, Integrated Catchment Management, and farm inspections for the staff of local authorities and all implementing bodies.	Action previously assessed as **Unknown 3** in draft RBMP NIS [see Section 6.4.5.7 above].

7.2.5.2.8 Other Pressures

RBMP Action No.	Draft RBMP Action No. and Wording	Final RBMP Action Wording [Blue text / strikethrough denotes significant changes]	Assessment of Effects and Requirement for Mitigation
Other 1	*New action arising following Public Consultation*	DHLGH will prepare a proposal for enacting abstraction regulations.	The key activity here is the preparation of a proposal for enacting abstraction regulations. This includes settling of draft legislation. **No significant adverse effects** foreseen on European sites, their QIs/SCIs, conservation objectives or site integrity.
Other 2	**Action 2.4(7):** Irish Water and relevant stakeholders will work together to implement mitigation measures for abstractions determined to be significant pressures through the abstraction licensing process.	The EPA, as competent authority will work with stakeholders to identify mitigation measures for abstractions determined to be significant pressures, and through the abstraction licensing process, require the implementation of relevant mitigation measures.	Action previously assessed as **Action 2.4(7)** in draft RBMP NIS [see Section 6.4.1.2 above].
Other 3	**Action 2.4(8):** The need for exemptions will be reviewed as the abstraction licensing process is rolled out.	The need for exemptions will be reviewed as the abstraction licensing process is rolled out.	Action previously assessed as **Action 2.4(8)** in draft RBMP NIS [see Section 6.4.1.2 above].

Other 4	~~**Other 1:** Relevant national authorities to ensure full implementation of the existing measures.~~	~~Relevant national authorities to ensure full implementation of the existing measures.~~ Deleted	Other actions provide the intended clarity on implementing measures, particularly the Sectoral Action Plans and PDO.

7.2.5.2.9 Peatlands

RBMP Action No.	Draft RBMP Action No. and Wording	Final RBMP Action Wording [Blue text / strikethrough denotes significant changes]	Assessment of Effects and Requirement for Mitigation
Peat 1	**Peat 1:** Measures set out in the National Peatlands Strategy be updated into a new Implementation Plan by NPWS.	Measures set out in the National Peatlands Strategy be updated into a new Implementation Plan by NPWS.	Action previously assessed as **Peat 1** in draft RBMP NIS [see Section 6.4.5.9 above].
Peat 2	*New action arising following Public Consultation*	In support of the Catchment Management Work Plans, the NPWS will publish a Sectoral Action Work Plan. Measures set out in the National Peatlands Strategy be updated into the Sectoral Action Work Plan Plan by NPWS.	The key activity relates to the publication of a Sectoral Action Work Plan. This includes a number of administrative steps relating to stakeholder engagement and agreement on templates, data for input into Catchment Management Plans, data collation and tracking through annual reporting. **No significant adverse effects** foreseen on European sites, their QIs/SCIs, conservation objectives or site integrity.
Peat 3	**Peat 2:** NPWS to continue driving implementation of the various programmes to restore the raised bog SAC and NHA network.	Continuation and expansion of NPWS national programme of peatland restoration on SAC and NHA raised bogs, blanket bogs and fens.	Action previously assessed as **Peat 2** in draft RBMP NIS [see Section 6.4.5.9 above].
Peat 4	**Peat 5:** Bord na Móna to oversee the “Peatlands and People” LIFE Integrated Project.	Bord na Móna to oversee the EU LIFE Integrated Project “Peatlands and People” .	Action previously assessed as **Peat 5** in draft RBMP NIS [see Section 6.4.5.9 above].

Peat 5	**Peat 6**: NPWS and Geological Survey Ireland to fund an investigation into the causes of blanket bog landslides that occurred across Ireland in 2020, and the vulnerability of other at-risk areas to future failures.	NPWS and Geological Survey Ireland to fund an investigation into the causes of blanket bog landslides that occurred across Ireland in 2020, and the vulnerability of other at-risk areas to future failures.	Action previously assessed as **Peat 6** in draft RBMP NIS [see Section 6.4.5.9 above].
Peat 6	**Peat 7**: DAFM to oversee the implementation of sustainable management practises developed through the Blackstairs Mountains, Wicklow Mountains and MacGillycuddy Reeks Mountains EIP projects.	DAFM to oversee the implementation of sustainable management practices developed through the Blackstairs Mountains and Wicklow Mountains EIP projects within the ACRES East/South East Cooperation Project zone.	Action previously assessed as **Peat 7** in draft RBMP NIS [see Section 6.4.5.9 above].
Peat 7	*New action arising following Public Consultation*	Continuation of the Bord na Móna operated Enhanced Decommissioning, Rehabilitation and Restoration Scheme (EDRRS) to H2 2026.	Continuation of this scheme will continue to deliver a range of climate action benefits from greenhouse gas mitigation through reduced carbon emissions, carbon storage and accelerated carbon sequestration, in addition to enhancing biodiversity and protecting water quality. The NPWS as regulator for the scheme will ensure that all proposed improvements optimise climate, environmental, ecological and hydrological benefits. The key activities relate to the decommissioning, rehabilitation and restoration of a significant proportion of Bord na Mona bogs. **No significant adverse effects** foreseen on European sites, their QIs/SCIs, conservation objectives or site integrity.
Peat 8	**Peat 4**: DHLGH to oversee the coordination of the Wild Atlantic Nature LIFE Integrated Project (IP), bringing together the experience and knowledge of the associated partners.	Continuation of NPWS-led EU LIFE IP Wild Atlantic Nature programme, including the development of complementary projects such as enhancing restoration capacity through building projects such as Natura Communities, retrofitting programmes to reduce turf cutting in the Natura 2000 network of sites and development of a	The Wild Atlantic Nature Project is a 9-year EU-funded LIFE Integrated Project, working with farmers, local communities and landowners to add value to the wide range of services provided from Special Areas of Conservation (SAC) network of blanket bogs and associated areas. These peatlands provide clean drinking water, store carbon, support biodiversity, produce high quality food and support

		nature restoration programme compatible with Ireland's CAP Strategic Plan.	resilient rural economies and livelihoods through farming, tourism, recreation and other activities . As part of the overall project, a results-based payment scheme is being trialled on a voluntary basis. This approach links payments to the environmental quality of a farm, with higher nature quality resulting in a higher payment level. The results based approach recognises that management of farmland (including farmyard management, nutrient balance, and condition and management of watercourses) has a direct influence on the quality of habitat. This incentivisation linked to habitat quality will have positive effects on the wider Natura network. Enhancing restoration capacity through Natura Communities and retrofitting programmes to reduce turf cutting in the Natura 2000 site network is intended for the protection of European sites and their conservation objectives. A nature restoration programme compatible with the CAP Strategic Plan will further enhance the implementation of these objectives. The key activities relate to the management of European sites for their conservation. **No significant adverse effects** foreseen on European sites, their QIs/SCIs, conservation objectives or site integrity.
Deleted	~~**Peat 3:** Appropriate bodies to implement the actions arising from the CANN and CABB Interreg programmes.~~	~~**Peat 3:** Appropriate bodies to implement the actions arising from the CANN and CABB Interreg programmes.~~ Complete	N/A
Deleted	~~**Peat 8:** NPWS to explore peatland financing options to escalate restoration efforts including public private partnerships, community trusts, offsetting etc.~~	~~**Peat 8**: NPWS to explore peatland financing options to escalate restoration efforts including public private partnerships, community trusts, offsetting etc.~~	N/A

		Deleted	

7.2.5.2.10 Industry, Mines and Quarries

RBMP Action No.	Draft RBMP Action No. and Wording	Final RBMP Action Wording [Blue text / strikethrough denotes significant changes]	Assessment of Effects and Requirement for Mitigation
IMQ 1	**IMQ 1:** DHLGH will examine opportunities to further support businesses in taking on a water stewardship approach in their operations.	DHLGH will examine opportunities to further support businesses in taking on a water stewardship approach in their operations.	Action previously assessed as **IMQ 1** in draft RBMP NIS [see Section 6.4.5.10 above].
5.2 repeat (as above)	**IMQ 2:** The EPA will establish a Working Group under the National Technical Implementation Group to examine the implementation of current legislation governing activities which pose a risk to waters and to identify opportunities to improve compliance with it. The focus will be on protecting water bodies from pressures and activities which are resulting in deterioration of water quality.	The National Technical Implementation Group will identify the issues preventing water quality objectives from being achieved and will identify any further evidence, legislative, policy or implementation gaps that need to be addressed.	The key activity will be the identification of issues causing declines in water quality and the examination of the implementation of current legislation focussed on water protection, including gaps that need to be addressed to prevent declines. **No significant adverse effects** foreseen on European sites, their QIs/SCIs, conservation objectives or site integrity.

7.2.5.2.11 Drinking Water Source Protection

RBMP Action No.	Draft RBMP Action No. and Wording	Final RBMP Action Wording [Blue text / strikethrough denotes significant changes]	Assessment of Effects and Requirement for Mitigation
Drinking Water 1	**Drinking Water 1:** Drinking Water Expert Group to make recommendations to the Minister regarding a new approach to drinking water source protection as part of the	Development of Drinking Water Source Protection Framework and Guidelines to meet the requirements of the recast Drinking Water Directive, and incorporating the application of abstraction controls under the implementing	The key activities in relation to this action are: stakeholder engagement in relation to production of Drinking Water Protection National Framework and guidance; review of implementation of framework and guidance; and regulations for the

	transposition of the recast Drinking Water Directive.	regulations for the Water Environment (Abstractions and Associated Impoundments) Act 2022.	implementation of Water Environment (Abstractions and Associated Impoundments) Act 2022. This will include a framework for the implementation of abstraction controls on large and environmentally significant abstractions. Effective abstraction control may limit the volume of water being abstracted and enact more stringent controls on abstractions and impoundments, including the requirement for environmental assessment and licensing. This will result in positive changes for water. Overall, the long-term impacts in relation to drinking water will be positive as it will lead to an increase in protection of water sources, thereby reducing the need for water treatment in terms of drinking water. Abstractions can change flow dynamics, nutrient loads and dispersion rates. This in turn can lead to in-combination effects with other emissions to the same water body or catchment. However the purpose of these new regulations is for the sustainable management of water abstractions. In addition to compliance with the WFD (noting its connection to the Habitats Directive and Birds Directive by way of the register of protected areas) the licensing process will have to separately show compliance with the Art. 6(3) and if necessary 6(4) of the Habitats Directive and as such will need to be supported by an AA process culminating in an AA determination.
Drinking Water 2	*New action arising following Public Consultation*	A Sectoral Action Plan for Drinking Water will include measures and plans to address the source protection actions proposed under the Drinking Water Regulations. It will be coordinated by the DW Expert Group with support from Uisce Eireann, NFGWS and LAs.	The key activity relates to the publication of a Sectoral Action Work Plan. This includes a number of administrative steps relating to stakeholder engagement and agreement on templates, data for input into Catchment Management Plans, data collation and tracking through annual reporting.

			No significant adverse effects foreseen on European sites, their QIs/SCIs, conservation objectives or site integrity.

7.2.5.2.12 Invasive Alien Species

RBMP Action No.	Draft RBMP Action No. and Wording	Final RBMP Action Wording [Blue text / strikethrough denotes significant changes]	Assessment of Effects and Requirement for Mitigation
Invasive 1	**Invasive 1:** NPWS to finalise legislation for the implementation of EU Regulation.	Finalise legislation for the implementation of the EU Invasive Alien Species (IAS) Regulation.	Action previously assessed as **Invasive 1** in draft RBMP NIS [see Section 6.4.5.12 above].
Invasive 2	**Invasive 2:** NPWS to prepare draft management plans and priority pathway actions plans for priority invasive species.	Implementation of existing management plans and Priority Pathway Action Plans (PPAP) for priority invasive species, and drafting of a new PPAP for Soils and Spoil.	Under Article 13(1) of the EU Regulation on Invasive Alien Species, Member States are required to carry out comprehensive analysis of the pathways of unintentional introduction and spread of invasive alien species and 'identify the pathways which require priority action because of the volume of species or of the potential damage caused by the species entering the Union through those pathways'. By analysing the risk of each of the IAS of Union concern being introduced and spread in Ireland with the potential impact they may have, the associated pathways are ranked and prioritized. For the priority pathways, Pathway Action Plans are developed. The purpose of Pathway Action Plans is to prevent or minimize the risk posed by the pathways using measures such as raising public awareness and setting out actions to prevent unintentional introductions by minimizing the contamination of goods, commodities, vehicles, and equipment by

			invasive alien species, and ensuring appropriate border checks. It is noted that the EU regulations do not include some of the most prevalent IAS in Ireland including Japanese knotweed, Himalayan Balsam and Giant Hogweed. Therefore, focussing on only the EU list may not adequately address the issues being experienced in Ireland at the present time. The introduction and spread of IAS has potential to prevent QI and SCI from achieving their favourable conservation status and as such the control and management of IAS will have positive effects in the medium to long-term on European sites. However, management is not without risk associated with unintended spread, use of chemicals in treatment etc. which has potential for adverse effects. Each management plan must undergo AA process to ensure that the pathways for impact are fully understood and accounted for in any actions.
Invasive 3	*New action arising following Public Consultation*	In support of the Catchment Management Work Plans, the NPWS will publish a Sectoral Action Work Plan, which will include for the implementation of existing management plans and Priority Pathway Action Plans (PPAP) for priority invasive species, and drafting of a new PPAP for Soils and Spoil.	The key activity relates to the publication of a Sectoral Action Work Plan. This includes a number of administrative steps relating to stakeholder engagement and agreement on templates, data for input into Catchment Management Plans, data collation and tracking through annual reporting. **No significant adverse effects** foreseen on European sites, their QIs/SCIs, conservation objectives or site integrity.
Invasive 4	**Invasive 3:** NPWS to advance negotiations on the recruitment of additional Biodiversity Officers.	Complete negotiations on the recruitment of additional Biodiversity Officers.	Action previously assessed as **Invasive 3** in draft RBMP NIS [see Section 6.4.5.12 above].

Invasive 5	**Invasive 4:** An additional €500,000 to be provided for projects tackling Invasive Alien Species under the Local Authority Biodiversity Grant Scheme.	Include action on Invasive Alien Species (IAS) as a priority under the Local Authority Biodiversity Grant Scheme. The Local Biodiversity Action Fund provides Local Authorities with funding to target actions in the National Biodiversity Action Plan. Projects that include the mapping and appropriate treatment of IAS are listed as priorities within this funding stream.	This action has been strengthened by creating a specific funding stream priority. The key activity will be funding of projects to tackle IAS. While tackling IAS is broadly positive and will have positive effects for European sites, particularly where they are a pressure on QI/SCI and achieving conservation objectives, there is a risk of direct and indirect negative effects on European sites, their QIs/SCIs, conservation objectives or site integrity from use of chemical treatments, disturbance of protected habitats and species or onward movement IAS. AA screening of projects tackling Invasive Alien Species will be required to ensure these direct, indirect or ex-situ effects are fully considered.
Invasive 6	*New action arising following Public Consultation*	Develop a National Management Plan for Invasive Species, and bring to public consultation in early 2024.	The key activity relates to the development of a plan. It includes the convening of a steering group to finalise the draft plan, public consultation and stakeholder engagement and finally, publication of a National Management Plan for Invasive Species. **No significant adverse effects** foreseen on European sites, their QIs/SCIs, conservation objectives or site integrity.
Deleted	**Invasive 5:** DHLGH to provide increased funding to the Community Water Fund to allow for additional projects, including invasive species control projects, to be undertaken at community level.	~~**Invasive 5:** DHLGH to provide increased funding to the Community Water Fund to allow for additional projects, including invasive species control projects, to be undertaken at community level.~~	N/A The action of increased funding for invasive species control has been captured by **Invasive 5** and **Action 6.14** and therefore deleted.

7.2.5.2.13 Hazardous Chemicals in the Aquatic Environment

RBMP Action No.	Draft RBMP Action No. and Wording	Final RBMP Action Wording [Blue text / strikethrough denotes significant changes]	Assessment of Effects and Requirement for Mitigation
HazChem 1	**HazChem 1:** DHLGH will amend the EQS Regulations to take account of the assessment of River Basin Specific Pollutants (RBSPs) by the National Aquatic Environmental Chemistry Group (NAECG). **HazChem 3:** Follow up scoping study on River Basin Specific Pollutants will be undertaken by the NAECG.	DHLGH will amend the EQS Regulations to take account of the assessment of River Basin Specific Pollutants (RBSPs) by the National Aquatic Environmental Chemistry Group (NAECG). ~~**HazChem 3:** Follow up scoping study on River Basin Specific Pollutants will be undertaken by the NAECG.~~	Action previously assessed as **HazChem 1** in draft RBMP NIS [see Section 6.4.5.13 above]. HazChem 3 has been deleted in the final plan due to overlap with HazChem 1, which incorporates it.
HazChem 2	**HazChem 2:** DHLGH and EPA will input into the recently commenced EU work to revise the list of Priority Substances and Priority Hazardous Substances.	DHLGH and EPA will input into the recently commenced EU work to revise the list of Priority Substances and Priority Hazardous Substances.	Action previously assessed as **HazChem 2** in draft RBMP NIS [see Section 6.4.5.13 above].
HazChem 3	*New action arising following Public Consultation*	Teagasc, ASSAP and DAFM, with support from LAWPRO, will implement specific actions in high-risk catchments to protect water quality from toxic impacts arising from the handling, use and disposal of sheep dip.	The handling, use and disposal of sheep dip has the potential to result in serious water quality impacts if not done correctly. Poor siting, inadequate disposal and particularly poor management of the dipping operation can be responsible for water quality impacts[32]. The proposed action will assess the feasibility of introducing a register to record sales, use and disposal of chemicals associated with sheep dip in order to register to track sales and disposal of cypermethrin, diazinon and amitraz. In addition, the NTIG will work with the National Hazardous Waste Management Plan working group in relation to preventing toxic impacts arising from such activities and causing water quality deteriorations, and

[32] Virtue, W.A. and Clayton, J.W. (1997). *Sheep dip chemicals and water pollution*. Science of the Total Environment, Volumes 194-195, pgs 207-217.

			provide draft recommendations for the management of sheep dip. It is anticipated that these actions will protect water quality from deterioration. **No significant adverse effects** foreseen on European sites, their QIs/SCIs, conservation objectives or site integrity.
	HazChem 4: The NAECG will oversee a project to develop revised Environmental Quality Standards for the protection of designated shellfish waters.	~~**HazChem 4:** The NAECG will oversee a project to develop revised Environmental Quality Standards for the protection of designated shellfish waters.~~	N/A This key part of this action is covered by Aqua 4 (Aqua 3 in draft plan). It is not appropriate for the NAECG to oversee this action, but to provide support in relation to *Enhanced Protection for Designated Shellfish Production Areas.*

7.2.5.2.14 Aquaculture

RBMP Action No.	Draft RBMP Action No. and Wording	Final RBMP Action Wording [Blue text / strikethrough denotes significant changes]	Assessment of Effects and Requirement for Mitigation
Aqua 1	*New action arising following Public Consultation*	Review of consents causing impacts: DAFM will conduct a periodic review and, where necessary, update of controls contained in aquaculture consents.	The key activity relates to a periodic review and update of controls contained in aquaculture consents, which may result in revised licences, as appropriate. The updates may results in more stringent controls being applied in aquaculture consents following review and discussions between DAFM and DHLGH. **No significant adverse effects** foreseen on European sites, their QIs/SCIs, conservation objectives or site integrity.
Aqua 2	**Aqua 2:** DAFM and DHLGH to review opportunities to strengthen the links between	Enhanced integration of WFD into Aquaculture Consents: DAFM to enhance links between the	The key activity will be examining options for strengthening links between aquaculture and WFD.

	the Aquaculture licensing process and the objectives of the WFD.	aquaculture authorisation and the objectives of the Water Framework Directive.	This includes engagement between DAFM and DHLGH to review how the WFD process is provided for within the aquaculture licensing system. **No significant adverse effects** foreseen on European sites, their QIs/SCIs, conservation objectives or site integrity.
Aqua 3	**Aqua 1:** DAFM to seek to improve access to information through the launch of an online mapping viewer of licensed aquaculture sites in Ireland which will link to licence information already available online.	Online Aquaculture licensing: To encourage the active involvement of all interested parties DAFM is to launch an online mapping viewer of licensed aquaculture sites in Ireland including access to licence and licence application information.	Action previously assessed as **Aqua 1** in draft RBMP NIS [see Section 6.4.5.14 above].
Aqua 4	**Aqua 3:** DHLGH will seek to implement a new legislative and management framework for shellfish waters in Ireland.	*Enhanced Protection for Designated Shellfish Production Areas*: DHLGH will examine the need for amendments to legislation and whether a new management framework for shellfish waters in Ireland is needed.	Action previously assessed as **Aqua 3** in draft RBMP NIS [see Section 6.4.5.14 above].
Aqua 5	*New action arising following Public Consultation*	Complete the National Strategic Plan for Sustainable Aquaculture, including water quality measures.	The National Strategic Plan for Sustainable Aquaculture Development 2030 was published in October 2023. Article 34 of Regulation (EU) No 1380/2013 of the European Parliament and of the Council on the Common Fisheries Policy ('the CFP'), on the promotion of sustainable aquaculture, calls for the establishment of multiannual national strategic aquaculture plans. The NSPSA 2030 is the second such plan under the current CFP. The plan identifies, inter alia, measures to secure sustainable development and growth of aquaculture through coordinated spatial planning. It was subject to both AA and SEA.

			No significant adverse effects foreseen on European sites, their QIs/SCIs, conservation objectives or site integrity.

7.2.5.2.15 Land Use Planning

RBMP Action No.	Draft RBMP Action No. and Wording	Final RBMP Action Wording [Blue text / strikethrough denotes significant changes]	Assessment of Effects and Requirement for Mitigation
Land Use 1	**Land Use 1:** Roll out training on the new water and planning guidance to practitioners.	Finalise guidelines for the incorporation of the Water Framework Directive considerations into the planning system and roll out of training on the new water and planning guidelines to practitioners.	The key activities are to finalise the guidelines and roll out training on the guidelines. It is recommended that the training specifically addresses the integration of WFD with the Habitats Directive. Specifically, it should address the issues of overlap, potential for conflicting or more onerous objectives under the different pieces of legislation and the differences in "tests" for assessment purposes under both pieces of legislation.
Land Use 2	**Land Use 2**: Progress amendments to the planning and development legislation to give effect to the new guidance.	Legislative provision to give effect to the new Water and Planning Guidance to be progressed.	The key activity is legislative provision. It is recommended that the legislation clarifies how the requirements of the Habitats Directive are to be considered and the process where conflicts arise.

7.2.5.2.16 Protecting and Restoring Estuarine and Coastal Waters

RBMP Action No.	Draft RBMP Action No. and Wording	Final RBMP Action Wording [Blue text / strikethrough denotes significant changes]	Assessment of Effects and Requirement for Mitigation

Coastal 1	*New action arising following Public Consultation*	Marine Protected Areas (MPAs) which are within the areas covered by the WFD (up to one nautical mile off shore) will be incorporated into the registered of protected areas under the WFD, once the legislation is enacted.	The key activity relates to the enactment of stand-alone legislation to enable the identification, designation and management of MPAs in accordance with national ambitions and international commitments. The designation of MPAs using best available science and a participatory, ecosystem-based approach is ongoing. It also includes the development of management plans for designated MPAs, with the goal of 30% MPA coverage by 2030. MPAs can support economic activity associated with the sea; for example, by conserving areas of particular importance to marine ecosystems and ensuring that human activity is kept at a level that will sustain biological diversity, natural productivity, human health and well-being. MPAs can also help reduce the effects of climate change and ocean acidification by ensuring that marine ecosystems are healthy and resilient, and that the marine environment can act as a natural carbon storage system. This science-based approach to the designation and management of MPAs, in addition to the enactment of legislation is positive for biodiversity and water quality in the marine environment. MPAs provide a tool for ecosystem restoration. **No significant adverse effects** foreseen on European sites, their QIs/SCIs, conservation objectives or site integrity.

7.2.6 Implementation and Governance

RBMP Action No.	Draft RBMP Action No. and Wording	Final RBMP Action Wording [Blue text / strikethrough denotes significant changes]	Assessment of Effects and Requirement for Mitigation
6.1	**Action 2.4(1):** LAWPRO, in consultation with stakeholders, to produces templates for the catchment management plans that will be put in place for each of the 46 hydrometric catchments.	LAWPRO will oversee the development of the template for the 46 Catchment Management Work Plans by Q2 2024.	Action previously assessed as **Action 2.4(1)** in draft RBMP NIS [see Section 6.4.1.2 above].
6.2	*New action arising following Public Consultation*	Implementing Bodies to engage with LAWPRO to provide the data required for their work in compiling the 46 Catchment Work Plans and also trialling the CMP template in the 5 pilot catchments.	The key activity relates to engagement with implementing bodies in the development of the CMPs to provide information as required for catchment plans and pilot catchment areas. **No significant adverse effects** foreseen on European sites, their QIs/SCIs, conservation objectives or site integrity.
6.3	*New action arising following Public Consultation*	DHLGH will establish a Programme Delivery Office to oversee and co-ordinate the many relevant bodies that manage, implement, and enforce legislation and policies relevant to the Water Framework Directive.	The key activity relates to the establishment of a Programme Delivery office to provide coordination and management of stakeholders that manage, implement and enforce legislation and policies relevant to the WFD. It is anticipated that this will lead to increased collaboration and efficiency in the implementation of WFD objectives. **No significant adverse effects** foreseen on European sites, their QIs/SCIs, conservation objectives or site integrity.
6.4	**Structural / Societal 1:** DHLGH to provide clarification on the roles and responsibilities of the various implementation bodies, shifting emphasis from the sharing of information and the provision of updates to a more focused provision of high-level policy direction, monitoring implementation of the plan, and project management.	DHLGH will review the roles and responsibilities of implementation bodies, shifting emphasis from the sharing of information and the provision of updates to a more focused provision of high-level policy direction, monitoring implementation of the Plan, and project management.	Action previously assessed as **Structural / Societal 1** in draft RBMP NIS [see Section 6.4.4.2 above].

6.5	**Structural / Societal 2:** An enhanced programme of formal and scheduled monitoring and reporting of progress in respect of the implementation of the RBMP will be put in place.	An enhanced programme of formal and scheduled monitoring and reporting of progress in respect of the implementation of the RBMP will be put in place.	Action previously assessed as **Structural / Societal 2** in draft RBMP NIS [see Section 6.4.4.2 above].
6.6	*New action arising following Public Consultation*	National Oversight and Audit Commission (NOAC) will include appropriate water quality metrics in Key Performance Indicators for local authorities during the next review of indicators.	The key activity relates to engagement and agreement with NOAC on the inclusion of Key Performance Indicators on water quality for local authorities. **No significant adverse effects** foreseen on European sites, their QIs/SCIs, conservation objectives or site integrity.
6.7	**Structural / Societal 3:** Provide a continued emphasis on the full range of the regulatory mix, from awareness and education, through to norms and enforcement, with a review undertaken to ensure there is an appropriate balance in the third cycle to ensure a greater emphasis on compliance assurance activity.	Provide a continued emphasis on the full range of the regulatory mix, from awareness and education, through to norms and enforcement, with a review undertaken to ensure there is an appropriate balance in the third cycle to ensure a greater emphasis on compliance assurance activity.	Action previously assessed as **Structural / Societal 3** in draft RBMP NIS [see Section 6.4.4.2 above].
6.8	**Structural / Societal 4:** Specific capacity building programmes of work to be put in place to encourage the transfer of learning and knowledge.	Specific capacity building programmes of work to be put in place to encourage the transfer of learning and knowledge.	Action previously assessed as **Structural / Societal 4** in draft RBMP NIS [see Section 6.4.4.2 above].
6.9	**Structural / Societal 5:** Ensure further activation, development and support of local level initiatives (rivers trusts, catchment partnerships).	Ensure further activation, development and support of local level initiatives (rivers trusts, catchment partnerships) in support of the delivery of the RBMP.	Action previously assessed as **Structural / Societal 5** in draft RBMP NIS [see Section 6.4.4.2 above].
6.10	**Public Participation 5**: An Fóram Uisce to identify the optimum level of engagement with the implementation structures for the WFD as part of their strategic planning process.	The Water Forum to identify and advise the Water Policy Advisory Committee (WPAC) and Minister on the optimum level of engagement with the implementation bodies, agencies and structures for the WFD to support implementation of the third-cycle, in accordance with its functions under Article 26 of the 2017 Water Services Act (Number 29).	The key activity will be to review The Water Forum (An Fóram Uisce). **No significant adverse effects** foreseen on European sites, their QIs/SCIs, conservation objectives or site integrity.

6.11	**Public Participation 4:** Explore opportunities for the development of a national citizen science programme.	Building on the excellent work already undertaken by the EPA, LAWPRO and various other bodies, DHLGH will provide further supports for the development of a National Water focused Citizen Science Strategy for the monitoring of water quality.	Action previously assessed as **Public Participation 4** in draft RBMP NIS [see Section 6.4.4.4 above].
6.12	**Public Participation 1:** Evaluate the outcome of the Resilience Project for Rivers Trusts to inform future community engagement initiatives.	LAWPRO to evaluate the outcome of the Resilience Project for Rivers Trusts to inform future community engagement initiatives, including on citizen science.	Action previously assessed as **Public Participation 1** in draft RBMP NIS [see Section 6.4.4.4 above].
6.13	**Public Participation 2:** Examine ways in which further support can be provided for the formation and capacity building of local forums to help identify and implement measures.	LAWPRO to examine ways in which further support can be provided for the formation and capacity building of local forums to help identify and implement measures.	Action previously assessed as **Public Participation 2** in draft RBMP NIS [see Section 6.4.4.4 above].
6.14	**Public Participation 3:** Increase the level of funding under the Community Water Development Fund.	LAWPRO and DHLGH to review the operation of the Community Water Development Fund with a view to strengthening it.	Action previously assessed as **Public Participation 3** in draft RBMP NIS [see Section 6.4.4.4 above].
6.15	*New action arising following Public Consultation*	LAWPRO will facilitate public participation in the development of the Catchment Management Work Plans through workshops for the 5 pilot catchments. This will inform the development and implementation of a national approach to public participation to deliver outcomes for water, climate and nature.	The key activity relates to carrying out public participation workshops in five pilot catchments, which will help to inform the development and implementation of a national approach to public participation to deliver outcomes for water, climate and nature. **No significant adverse effects** foreseen on European sites, their QIs/SCIs, conservation objectives or site integrity.
6.16	*New action arising following Public Consultation*	The public participation pilots will provide learnings (which will then be implemented) on how agencies, local authorities, communities and landowners can work together to support	The key activity is for the five pilot public participation workshops to include learnings and recommendations on the public participation aspects of the Catchment Management Work

		action planning and project co-creation for a combined top-down bottom-up approach to the development and implementation of the 46 Catchment Management Work Plans.	Plans. It also includes the establishment of a committee to design the format of a Community Forum based on stakeholder feedback and pilot findings. **No significant adverse effects** foreseen on European sites, their QIs/SCIs, conservation objectives or site integrity.
6.17	**Action 2.4(2):** Carry out a review of Local Authority Resources to put in place appropriate resources to support individual local authorities in fulfilling their role in water quality protection and restoration	A review of the wider local authority structures will be progressed to inform future needs in the water area and to identify the appropriate level of resources and involvement required from the sector to meet WFD objectives.	Action previously assessed as **Action 2.4(2)** in draft RBMP NIS [see Section 6.4.1.2 above].
6.18	**Action 4.3(1):** Progress further studies under the ESRI Joint Research Programme on Water.	The Research Programme on Water will be continued into the third cycle with an emphasis on studies on water governance, economics and behavioural aspects of water protection.	The key activity for this action relates to further studies under the JPI. **No significant adverse effects** foreseen on European sites, their QIs/SCIs, conservation objectives or site integrity.
6.19	**Action 4.3(2):** Review to be undertaken of the Local Authority Waters Programme and Wider Local Authority Structures to inform their evolution and identify the appropriate level of resources and involvement required from the sector to meet WFD objectives.	Review to be undertaken of the Local Authority Waters Programme to identify necessary resources for the third cycle and beyond to deliver the commitments under the WFD and future RBMPs.	Action previously assessed as **Action 4.3(2)** in draft RBMP NIS [see Section 6.4.3.1 above]. Measure has been edited to the Local Authority Waters Programme alone due to review of the wider local authority resources being included as action 6.17 above.
6.20	**Action 4.3(3):** DHLGH to review the outcomes of the IPA Governance Research programme on Ireland's water governance arrangements and implement their recommendations where appropriate.	Duplicated action in draft plan. Structural / Societal 6 has been deleted. Review the outcomes of the IPA Governance Research programme on Ireland's water	Action previously assessed as **Action 4.3(3)** in draft RBMP NIS [see Section 6.4.3.1 above].

	Structural / Societal 6: Review the outcomes of the IPA/EPA Governance Research Programme.	governance arrangements and implement their recommendations where appropriate. ~~**Structural / Societal 6**: Review the outcomes of the IPA/EPA Governance Research Programme.~~	
6.21	**Action 4.3(4):** Carry out an assessment of the Agricultural Sustainability Support and Advisory Programme (ASSAP) to review, examine, evaluate, comment and report on the rationale, efficiency, effectiveness and sustainability of ASSAP to date, along with recommendations for the future and its role and objectives under the third-cycle plan.	Implement the recommendations of the External Expert assessment of the Agricultural Sustainability Support and Advisory Programme (ASSAP) during the third-cycle.	The key activity relates to the implementation of the recommendations of the External Expert assessment of ASSAP. It includes agreement on Terms of Reference, review and report on the recommendations and finally to action the recommendations. The new Water EIP will provide an important mechanism for implementing many of these recommendations. **No significant adverse effects** foreseen on European sites, their QIs/SCIs, conservation objectives or site integrity.
6.22	**Action 2.5(1):** Strengthening water protection provisions where necessary in relevant sectoral policies. These include water services policy, spatial planning policy, agricultural policy and aquaculture policy.	Water protection provisions in relevant sectoral policies will be strengthened, where necessary. These include; water services policy, spatial planning policy, agricultural policy and aquaculture policy.	Action previously assessed as **Action 2.5(1)** in draft RBMP NIS [see Section 6.4.1.3 above].
6.23	**Action 2.5.(2):** Identifying and embedding measures that will deliver multiple policy objectives (e.g. water, biodiversity and climate adaptation/mitigation) into sectoral policies.	Measures that will deliver multiple policy objectives (e.g. water, biodiversity and climate adaptation/mitigation) will be identified and embedded into sectoral policies.	Action previously assessed as **Action 2.5(2)** in draft RBMP NIS [see Section 6.4.1.3 above].
Deleted	**Action 2.4(9):** A multiagency group under the NTIG to continue a forum to co-ordinate efforts for implementation of Nature-based Catchment Management.	~~**Action 2.4(9):** A multiagency group under the NTIG to continue a forum to co-ordinate efforts for implementation of Nature-based Catchment Management.~~ Deleted	Group concluded and published reports in 2021 which are available on catchments.ie

7.2.7 Public and Stakeholder Engagement

RBMP Action No.	Draft RBMP Action No. and Wording	Final RBMP Action Wording [Blue text / strikethrough denotes significant changes]	Assessment of Effects and Requirement for Mitigation
7.1	*New action arising following Public Consultation*	Create opportunities for young people to engage, upskill and use their voice for sustainable development, through Youth-led and youth-focused groups, organisations and networks.	The key action here is the creation of opportunities to support engagement of young people in citizen science to promote biodiversity and environmental protection. **No significant adverse effects** foreseen on European sites, their QIs/SCIs, conservation objectives or site integrity.

7.2.8 Economic Analysis of Water Use

RBMP Action No.	Draft RBMP Action No. and Wording	Final RBMP Action Wording [Blue text / strikethrough denotes significant changes]	Assessment of Effects and Requirement for Mitigation
Econ 1	*New action arising following Public Consultation*	The DHLGH to undertake an evaluation including a stakeholder consultation of the appropriateness of water reuse for agricultural purposes within Ireland and report findings in the next River Basin Management Plan.	The key activity is an evaluation of the appropriateness of water reuse for agricultural purposes which will be subject to public consultation and report on those findings in the next RBMP. Findings will be reporting in the next RBMP. **No significant adverse effects** foreseen on European sites, their QIs/SCIs, conservation objectives or site integrity.
Econ 2	**Economic 1:** Prior to confirming the final programme of measures, the most cost	The cost effectiveness of new supplementary measures, such as the Water EIP and Barriers Mitigation Programme, will be analysed as soon as possible after they have been commenced	The key activity will be analysis of cost effectiveness of supplementary measures. It is acknowledged that the efficient use of funding and resources, as well as assignments across agencies

	effective combination of measures will be analysed.	and once there is sufficient progress made. The programmes will be modified, if and where necessary, to ensure that they are delivering value for money to the State.	is critical to ensure the measures can be practically implemented over the 3rd RBMP Cycle and beyond. It is important that any analysis of cost effectiveness has regard to total whole life cost. It is noted that the legal tests in relation to Appropriate Assessment do not allow for cost / economic as a reason to consent or permit adverse effects on any European site. Proposals must demonstrate that they can be implemented without adverse effects on the integrity of Special Areas of Conservation (SACs) or Special Protection Areas (SPAs), unless there are Imperative Reasons of Overriding Public Interest (IROPI) and no satisfactory alternatives (consistent with Article 6(4) of the Habitats Directive.
Econ 3	**Economic 2:** The economic regulator of water services (the CRU) will continue to assess and approve Irish Water's costs and investment plans. This will include an assessment of Irish Water's investment decisions to ensure effectiveness, efficiency and value-for-money in Irish Water's expenditure. The CRU will continue to monitor and report annually on Irish Water's delivery and performance in that context.	The economic regulator of water services (the CRU) will continue to assess and approve Uisce Éireann's costs and investment plans. This will include an assessment of Uisce Éireann's investment decisions to ensure effectiveness, efficiency and value-for-money in Uisce Éireann's expenditure. The CRU will continue to monitor and report annually on Uisce Éireann's delivery and performance in that context.	Action previously assessed as **Economic 2** in draft RBMP NIS [see Section 6.4.5.16 above].
Econ 4	**Economic 3:** Irish Water to publish a National Water Resources Plan and to maintain national wastewater capacity registers to ensure security of supply and sufficient capacity in drinking and wastewater networks to allow for balanced regional development in line with the National Planning Framework.	Uisce Éireann to implement the National Water Resources Plan and associated regional plans and to maintain national water and wastewater capacity registers to ensure security of supply and sufficient capacity in drinking and wastewater networks to inform decisions on balanced regional development in line with the National Planning Framework.	Action previously assessed as **Economic 3** in draft RBMP NIS [see Section 6.4.5.16 above]. Further more detailed plans are anticipated and Uisce Éireann as the competent authority will need to undertake further AA as more location specific information is included.

			Consent for any proposals arising from the National Water Resources Plan must demonstrate that they can be implemented without adverse effects on the integrity of Special Areas of Conservation (SACs) or Special Protection Areas (SPAs). Where adverse effects from proposals remain following mitigation, in line with Habitats Directive Article 6(3), consent for the proposals cannot be granted unless the prerequisites set by Article 6(4) are met.
Econ 5	**Economic 4:** Irish Water to continue to implement domestic excess use and non-domestic charging.	When approved, Uisce Éireann to implement domestic excess use and non-domestic charging.	Action previously assessed as **Economic 4** in draft RBMP NIS [see Section 6.4.5.16 above].
Econ 6	**Economic 5:** Conduct a new economic assessment of the potential for a natural capital/freshwater ecosystem services approach to protecting water resources, including the need for new economic instruments and protection of freshwater and marine ecosystem services.	The Minister will publish a report based on an economic assessment on the potential for a natural capital / freshwater ecosystem services approach to protecting water resources, including the need for new economic instruments and protection of freshwater and marine ecosystem services.	Action previously assessed as **Economic 5** in draft RBMP NIS [see Section 6.4.5.16 above]. Economic 5 relates to the conducting of this economic assessment, which this updated measure in the final RBMP aims to publish. The key activity is publishing of a report based on an economic assessment. **No significant adverse effects** foreseen on European sites, their QIs/SCIs, conservation objectives or site integrity.
Econ 7	**Economic 6:** Put in place a funding stream to upgrade and take in charge towns and villages without wastewater networks.	The Minister will maintain a funding stream to upgrade and take in charge towns and villages without wastewater networks to improve the wastewater needs of rural villages that are outside of the current Uisce Éireann collection network.	Measure previously assessed as **Economic 6** in draft RBMP NIS [see Section 6.4.5.16 above]. Minor changes to the action indicate that the funding stream is now in place and will be maintained. As per assessment in the draft RBMP NIS, the nature of the upgrades is not available at this point to assess further, but all investment decisions must

			be informed by an AA carried out by the relevant competent authority.
Econ 8	**Action 2.4(5):** Irish Water to review and update their Water Services Strategic Plan that covers a 25 year period of water services management.	Uisce Éireann will update the current Water Services Strategic Plan to covers the 25 year period of water services management up to 2050.	Measure previously assessed as **Action 2.4(5)** in draft RBMP NIS [see Section 6.4.1.2 above].
Econ 9	**Economic 7:** Finalise the review of rural water services and produce a rural water services strategic plan including a national rural water resources plan for the rural water sector. **Action 2.4(6):** The Department, together with the Department of Rural and Community Development, will develop and publish in 2024 a Rural Water Services Strategic Plan for the period 2025 to 2050.	Finalise the review of rural water services and produce a rural water services strategic plan including a national rural water resources plan for the rural water sector. ~~**Action 2.4(6):** The Department, together with the Department of Rural and Community Development, will develop and publish in 2024 a Rural Water Services Strategic Plan for the period 2025 to 2050.~~	Measure previously assessed as **Economic 7** in draft RBMP NIS [see Section 6.4.5.16 above]. Action 2.4(6) of the draft plan was deleted due to duplication with Econ 9 of the final plan.
Econ 10	*New action arising following Public Consultation*	Implement the policy as set on in "Irish Water – Towards a national, publicly-owned, regulated water services utility" so that Uisce Éireann has integrated the day to day operation and delivery of water services into its own organisational structure, in place of the current Service Level Agreements, on a phased basis.	The key activity is the implementation of policy by Uisce Éireann which clarifies the Government's views and expectations around the next phase of transformation in the Water Sector. *Our Shared Future*, the Programme for Government, includes a commitment to *"retain Irish Water in public ownership as a national, standalone, regulated utility".* The Programme also commits to ensuring that Irish Water (now Uisce Éireann) is sufficiently funded to develop plans to ensure security of supply of water resources and to develop sufficient capacity in drinking and wastewater networks to allow for balanced regional development.

			The objective is to ensure that modern and effective arrangements are in place for the delivery of water services that: • meet the needs and expectations of citizens and users, • comply with domestic and international legal obligations, • represent good value for money, • support the principles of social, economic and environmental sustainability, and • are retained in public ownership and control. Through the provision of sufficient funding do develop these plans, commitments may arise to upgrade and provide new water management infrastructure. Construction and operation of water management infrastructure can result in habitats loss or disturbance from site clearance and construction methods, species disturbance from construction and/or operation of infrastructure, emissions to water from water and wastewater treatment processes and abstractions. This can change flow dynamics, nutrient loads, and dispersion rates. This can in turn can lead to in-combination effects with other emissions to the same water body or catchment. As such, investment can lead to direct and indirect negative effects on the receiving environment, including European sites, their QIs/SCIs, conservation objectives or site integrity depending on the nature of the project and the connectivity to any European site. Any plans or projects arising from Uisce Éireann being sufficiently funded to develop plans to ensure the security of supply of water resources or to develop sufficient capacity in in drinking or

			wastewater networks will be subject to Appropriate Assessment, at such time as they are known. It is noted that the legal tests in relation to Appropriate Assessment do not allow for cost / economic as a reason to consent or permit adverse effects on any European site. Proposals must demonstrate that they can be implemented without adverse effects on the integrity of Special Areas of Conservation (SACs) or Special Protection Areas (SPAs), unless there are Imperative Reasons of Overriding Public Interest (IROPI) and no satisfactory alternatives (consistent with Article 6(4) of the Habitats Directive.
Econ 11	**Action 2.4(4):** Explore the feasibility of establishing a high level interdepartmental group to develop a comprehensive financing strategy to support the implementation of measures to deliver on the ambitious Water, Climate and Biodiversity objectives committed to in the Programme for Government; and Evaluate the options for accessing appropriate EU funding sources for achieving both WFD and protected area objectives.	Where additional targeted measures are identified as necessary to address gaps in WFD environmental objectives for cycle 3, as part of the mid-term progress review of the Programme of Measures in 2025, DHLGH will oversee the preparation of project proposals for funding under the new Infrastructure, Climate and Nature Fund.	The action has been updated following the announcement of the establishment of an Infrastructure, Climate and Nature fund. The key activity relates to a mid-term review of the Programme of Measures by end=2025, including an assessment and recommendations. In addition, identification of project proposals for funding will be carries out by DHLGH with stakeholder support. **No significant adverse effects** foreseen on European sites, their QIs/SCIs, conservation objectives or site integrity.

8 Mitigation Measures

The final mitigation chapter has been revised to reflect the final RBMP proposed for adoption.

It is noted that the RBMP is a strategic plan which sets the framework for and relies to a significant degree on programme and project initiatives to deliver measures on the ground for a more integrated catchment management approach to the management of Ireland's waters. Many of these have already undergone AA or are undergoing AA with development of specific measures which are or will be implemented. The measures committed to in these other plans will be essential to ensuring that the objectives of the RBMP are met and that the RBMP does not have adverse effects on the integrity any European site. The following table presents the required mitigation to address any potential adverse effects identified in the assessment. In addition, recommendations are made to improve the overall coherence of the RBMP and ensure opportunities for alignment with the Habitats and Birds Directives are integrated into the plan.

Acknowledging the high-level nature of the RBMP and the lack of specific detail, it is considered that the following overarching mitigation objectives are included in the RBMP prior to its adoption:

To further improve actions contained under the pressure areas within the RBMP and to address potential negative effects, mitigation measures and recommendations have been proposed for inclusion for specific sections in the final RBMP (see **Table 8-1**).

Table 8-1: Mitigation Measures outlined for the RBMP

Section	Mitigation Measures
ALL	**Overarching Protection 1:** It should be kept in mind that the RBMP does not replace or negate the need for other regulatory requirements particular to specific proposal types and scales, Public Bodies, decision-making processes or locations. Such requirements may apply at any stage of a proposal from investigative and feasibility studies to operation. There is an important role for optioneering at all phases of planning and development to avoid environmental impacts. Requirements include relevant environmental assessments such as, inter alia, Strategic Environmental Assessment (SEA), Environmental Impact Assessment (EIA) and Appropriate Assessment (AA), as appropriate. **Overarching Protection 2:** Proposals must demonstrate that they can be implemented without adverse effects on the integrity of Special Areas of Conservation (SACs) or Special Protection Areas (SPAs). Where adverse effects from proposals remain following mitigation, in line with Habitats Directive Article 6(3), consent for the proposals cannot be granted unless the prerequisites set by Article 6(4) are met. This will require that alternatives have been considered.

Section	Mitigation Measures
Setting Environmental Objectives	
Action 3.1	**Mitigation**: Article 4(5) exemptions must be subject to satisfying strict criteria, where avoidance, substitution, mitigation and management are not feasible. Consideration must also be given to the interrelationship between the Water Framework Directive and the Habitats Directive.
Action 3.2	**Mitigation:** The update of the Climate Adaptation Plan will be subject to Appropriate Assessment process.
Action 3.3	**Mitigation:** The sensitivity analysis must explicitly consider the potential for changes in QI/SCI population ranges and dynamics if adverse effects are to be avoided.
Action 3.5	**Recommendation:** It is recommended that specific research relating to climate change challenges associated with water dependant European sites (including terrestrial habitats which are groundwater dependant) would greatly increase the knowledge base to inform decisions not only on WFD compliance into the future but also Habitat Directive compliance.
Action 3.6	**Mitigation:** Any approach or project relating to Dublin Bay (or any measures arising from the approach or project) will be subject to AA.
Overview of the Programme of Measures	
Action 5.3, 5.4, 5.5 and 5.6	**Mitigation:** The DHLGH will develop a process to ensure that support, funding and coordination of such works and projects undergoes a risk assessment (carried out by LAWPRO or similar) with regard to likely significant effects on any European site, alone or in combination with other plans and projects. The risk assessment will include the requirement to engage with the AA process. **Mitigation:** Given that this is locally driven the most appropriate stage at which to undertake risk assessments is at the LAWPRO level where ecological expertise to support communities is in place to undertake the assessments. **Mitigation:** The DHLGH will ensure that there is awareness raising and training associated with any restoration works, works programmes and projects to ensure the potential for effects on any European site are understood more widely. **Mitigation:** Assessment will have regard to the Catchment Management Plans (noting the mitigation required in relation to the content of templates noted under Action 2.4(1). This will ensure a more coordinated approach to local actions. **Mitigation:** All catchment projects shall be subject to the AA process prior to roll out.
Agriculture	
Agri 1	**Mitigation:** An interim review of the 5th NAP will be undertaken and any required additional measures will be implemented. The output of this review will include a report on water quality assessment and new measure that will be given effect through amendment of the GAP Regulations. **Mitigation**: The 5th NAP was be subject to AA and SEA in its own right and includes mitigation measures for the avoidance of impact to European sites that must be adhered to.

Section	Mitigation Measures
	Mitigation: It is also required to be cognisant of the RBMP; including the mitigations identified within this NIS for the RBMP.
Agri 3	**Mitigation:** The CAP Strategic Plan will need to take full account of the mitigation measures identified in the NIS being prepared for that Plan (under separate cover).
Agri 5	**Mitigation:** Projects must also be guided by sufficient agricultural, biodiversity and catchment science expertise, i.e. ecologist, catchment scientist, agricultural advisor etc.
Agri 8	**Recommendation:** It is recommended that training is provided to ensure the online tool is properly used.
Agri 9	**Mitigation:** The CAP Strategic Plan will need to take full account of the mitigation measures identified in the NIS being prepared for that Plan (under separate cover).
Physical Modifications to the flow, form and/or function of natural surface water bodies	
Hymo 1	**Mitigation:** Consent for any proposals arising from the Hydromorphology Expert Group and the associated National Hydromorphology Programme must demonstrate that they can be implemented without adverse effects on the integrity of Special Areas of Conservation (SACs) or Special Protection Areas (SPAs). Where adverse effects from proposals remain following mitigation, in line with Habitats Directive Article 6(3), consent for the proposals cannot be granted unless the prerequisites set by Article 6(4) are met.
Hymo 2	**Mitigation:** The development of a new legislative regime will not give rise to adverse effects however, the new legislation must formally include the need for protection of European sites, their QI and SCI in decision making and the need for application of the AA process as part of the control regime.
Hymo 3	**Mitigation:** A risk assessment is needed to inform actions that are to be implemented on the ground. Given that specific measures will be decided upon at a more local level the most appropriate stage at which to undertake such assessments is at the IFI level where ecological expertise to support communities is in place to undertake the assessments. **Mitigation:** The DHLGH will ensure that there is awareness raising and training associated with any funding of initiatives to ensure the potential for adverse effects is understood more widely.
Hymo 5	**Mitigation:** Consent for any proposals arising from this feasibility work must demonstrate that they can be implemented without adverse effects on the integrity of Special Areas of Conservation (SACs) or Special Protection Areas (SPAs). Where adverse effects from proposals remain following mitigation, in line with Habitats Directive Article 6(3), consent for the proposals cannot be granted unless the prerequisites set by Article 6(4) are met.
Hymo 6	**Mitigation:** The following reports are outstanding and will be completed when the final design option has been decided: AA Screening, NIS and EcIA. **Mitigation:** Consent for any proposals arising from this process must demonstrate that they can be implemented without adverse effects on the integrity of Special Areas of Conservation (SACs) or Special Protection Areas (SPAs). Where adverse effects from

Section	Mitigation Measures
	proposals remain following mitigation, in line with Habitats Directive Article 6(3), consent for the proposals cannot be granted unless the prerequisites set by Article 6(4) are met.
Hymo 7	**Mitigation:** The actions once developed shall undergo screening for AA and preparation of an NIS, supported by hydrological modelling if required, to determine if the actions will have adverse effects on any QI/SCI or site integrity and inform the formal determination on AA. All actions proposed will also be informed by ecological impact assessment to ensure no unintended consequences on wider supporting biodiversity. **Mitigation:** Consent for any proposals arising from this feasibility work must demonstrate that they can be implemented without adverse effects on the integrity of Special Areas of Conservation (SACs) or Special Protection Areas (SPAs). Where adverse effects from proposals remain following mitigation, in line with Habitats Directive Article 6(3), consent for the proposals cannot be granted unless the prerequisites set by Article 6(4) are met.
Hymo 8	**Mitigation:** Consent for any proposals arising from this feasibility work must demonstrate that they can be implemented without adverse effects on the integrity of Special Areas of Conservation (SACs) or Special Protection Areas (SPAs). Where adverse effects from proposals remain following mitigation, in line with Habitats Directive Article 6(3), consent for the proposals cannot be granted unless the prerequisites set by Article 6(4) are met.
Forestry	
Forestry 3	**Mitigation:** DAFM to identify areas where conservation forestry practices will be required as a response to existing forestry pressures on known QI/SCI effected by historic forestry activity.
Forestry 4	**Mitigation:** The creation of new forests will need to be outside European sites; unless the activity is directly connected with or necessary to the management of the European Site for nature conservation. **Mitigation:** The creation of new forests outside of European sites, particularly those whose designated interests are hydrologically dependent, will need to demonstrate no adverse effect on the eco-hydrological function of the European site which underpins maintaining the favourable conservation status of the Site and its associated QIs/SCIs. **Recommendation:** It is recommended that the planting of new native woodland is specifically targeted to ensure that ecosystem services benefits are maximised, particularly for high status sites.
Forestry 5	**Mitigation:** Any application of support measures under these schemes must be subject to AA.
Forestry 7	**Mitigation:** All applications for afforestation approval under the Afforestation Scheme 2023-2027 will undergo an environmental assessment procedure. All applications submitted to DAFM will be subject to AA.
Forestry 8	**Mitigation:** Further transparency is required in relation to this measure and clarity on the processes followed, particularly if such forestry-related water incidents lead to damage to European sites, their QI or SCIs.

Section	Mitigation Measures
	Mitigation: DHLGH, working with DAFM will prepare a clear process for the recording and follow up of any forestry related water-incidents with potential for direct or indirect significant effects / adverse impacts on a European site, its QI or SCI. Initially this will require a risk assessment in relation to pathways for impact and consideration of impacts on achieving conservation objectives. Where effects are identified a co-ordinated response including NPWS, EPA, DAFM and DHLGH will be required.
Forestry 10	**Mitigation:** DAFM will integrate into their licensing process, a framework for consideration of in-combination effects at the catchment/ sub-catchment level to better inform AA determinations. **Mitigation:** DAFM to develop a GIS layer showing key forestry constraints including waterbodies at risk from forestry, high status areas, protected areas under WFD (which includes SAC/SPA) and water dependant ecosystems, all of which are available through the WFD app but may not be known or understood by individual applicants. This type of GIS support can inform forestry applications by avoiding high risk areas as a starting point. **Mitigation:** DAFM to develop a risk matrix in relation to forestry impacts on QI/SCI to inform sensitivity analysis.
Urban Wastewater	
UWW 1	**Mitigation:** Wastewater infrastructure is subject to planning and / or licensing of discharges. Both will require AA to inform decision making by the relevant competent authority thereby avoiding and / or mitigating the risk of any adverse effects. **Mitigation:** Any plans or projects arising from Uisce Éireann investment will be subject to Appropriate Assessment, at such time as they are known. **Mitigation:** Consent for any proposals arising from this investment by Uisce Éireann must demonstrate that they can be implemented without adverse effects on the integrity of Special Areas of Conservation (SACs) or Special Protection Areas (SPAs). Where adverse effects from proposals remain following mitigation, in line with Habitats Directive Article 6(3), consent for the proposals cannot be granted unless the prerequisites set by Article 6(4) are met. It is noted that the legal tests in relation to Appropriate Assessment do not allow for cost / economic as a reason to consent or permit adverse effects on any European site.
UWW 2	**Mitigation:** Wastewater infrastructure is subject to planning and / or licensing of discharges. Both will require AA to inform decision making by the relevant competent authority thereby avoiding and / or mitigating the risk of any adverse effects.
UWW 3	**Mitigation:** Wastewater infrastructure is subject to planning and / or licensing of discharges. Both will require AA to inform decision making by the relevant competent authority thereby avoiding and / or mitigating the risk of any adverse effects.
UWW 5	**Mitigation:** All investment decisions must be informed by an AA carried out by the relevant competent authority.
UWW 6	**Mitigation:** These projects will require planning and / or licenses which by law will be subject to AA at the site specific level.

Section	Mitigation Measures
	Mitigation: Any plans or projects arising from Uisce Éireann investment will be subject to Appropriate Assessment, at such time as they are known. **Mitigation:** Consent for any proposals arising from this investment by Uisce Éireann must demonstrate that they can be implemented without adverse effects on the integrity of Special Areas of Conservation (SACs) or Special Protection Areas (SPAs). Where adverse effects from proposals remain following mitigation, in line with Habitats Directive Article 6(3), consent for the proposals cannot be granted unless the prerequisites set by Article 6(4) are met. It is noted that the legal tests in relation to Appropriate Assessment do not allow for cost / economic as a reason to consent or permit adverse effects on any European site.
UWW 7	**Mitigation:** Consent for any proposals arising from this investment by Uisce Éireann must demonstrate that they can be implemented without adverse effects on the integrity of Special Areas of Conservation (SACs) or Special Protection Areas (SPAs). Where adverse effects from proposals remain following mitigation, in line with Habitats Directive Article 6(3), consent for the proposals cannot be granted unless the prerequisites set by Article 6(4) are met. It is noted that the legal tests in relation to Appropriate Assessment do not allow for cost / economic as a reason to consent or permit adverse effects on any European site.
Urban Runoff Pressures	
Urban Runoff 2	**Recommendation:** It is recommended that for complete clarity, the guidance specifically reference compliance with the EU Habitats and Birds Directives and the need for consideration of both Conservation Objectives for any European sites and related WFD Objectives.
Urban Runoff 8	**Mitigation:** All integrated urban drainage management plans will be screened for AA once prepared. The urban drainage management plans will need to contribute positively to achieving, maintaining, and restoring the favourable conservation status of European sites and their associated QIs/SCIs for the area covered by the Plan.
Domestic Wastewater Discharges	
Domestic WW 1	**Mitigation:** Any consent and/or licensing associated with such upgrades must be subject to AA.
Domestic WW 3	**Mitigation:** Where upgrades or new systems are required, there is potential for direct, indirect, construction, operational and cumulative effects on European sites in the absence of mitigation measures. Any consent and/or licensing associated with such upgrades must be subject to AA.
Other Pressures	
Other 2	**Mitigation:** In addition to compliance with the WFD (noting its connection to the Habitats Directive and Birds Directive by way of the Register of Protected Areas) the abstraction licensing process will have to separately show compliance with the Art. 6(3) and if necessary 6(4) of the Habitats Directive and as such will need to be supported by an AA process culminating in an AA determination.
Other 3	**Mitigation:** Any potential for exemptions shall be informed by the AA process in addition to any other assessment processes relevant to decision making. An exemption which leads to adverse effects on site integrity of any European site, alone or in combination,

Section	Mitigation Measures
	cannot be granted a license. In such a circumstance, where mitigations are not possible, alternatives and IROPI conditions must be met if the project is to proceed.
Peatlands	
Peat 1	**Mitigation:** Any modifications to the plan or indeed preparation of a new Implementation Plan arising out of the mid-term review must be subject to the AA process.
Peat 3	**Mitigation:** Where continued cutting is to be permitted on SAC bogs despite adverse effects on site integrity, an Article 6(4) derogation will be required to support the permission/licensing. This will require that alternatives have considered which include provisions of alternative fuel sources for example. **Mitigation:** Each restoration proposal relating to raised bog SAC will require AA which may in limited cases include consideration of imperative reasons of over-riding public interest where no less damaging alternative can be found.
Peat 6	**Mitigation:** AA screening of the specific actions under the Wild Atlantic Nature project will be required to ensure indirect or ex-situ effects are fully considered.
Drinking Water Source Protection	
Drinking Water 1	**Mitigation**: In addition to compliance with the WFD (noting its connection to the Habitats Directive and Birds Directive by way of the Register of Protected Areas) the licensing process will have to separately show compliance with the Art. 6(3) and if necessary 6(4) of the Habitats Directive and as such will need to be supported by an AA process culminating in an AA determination.
Invasive Alien Species	
Invasive 2	**Mitigation:** Each management plan must undergo AA process to ensure that the pathways for impact are fully understood and accounted for in any actions.
Invasive 5	**Mitigation:** AA screening of projects tackling Invasive Alien Species will be required to ensure these direct, indirect or ex-situ effects are fully considered.
Land-Use Planning	
Land Use 1	**Recommendation:** It is recommended that the training specifically addresses the integration of WFD with the Habitats Directive. Specifically, it should address the issues of overlap, potential for conflicting or more onerous objectives under the different pieces of legislation and the differences in “tests” for assessment purposes under both pieces of legislation.
Land Use 2	**Recommendation:** It is recommended that the legislation clarifies how the requirements of the Habitats Directive are to be considered and the process where conflicts arise.
Implementation and Governance	
Action 6.1	**Mitigation**: To ensure the avoidance of negative effects, the catchment management plan templates must:

Section	Mitigation Measures
	i. Be based on evidence regarding the eco-hydrological requirements of relevant European sites; ii. Integrate the requirement to maintain and restore the favourable conservation status of European site QI habitats and species and SCI species pertinent to the Catchment; including identifying actions to secure the delivering of this requirement with respect to a particular Catchment. iii. Contribute to the delivery of the Conservation Objectives of the QI habitats and species and SCI species pertinent to the Catchment; including identifying actions which deliver this contribution. iv. Identify activities within the catchment which prevent or are a threat to delivering (ii) and (iii); the Plan identifying the measures and mechanisms required to remove or reduce the threat – including conformance with relevant existing legislation. In addition, as the content of these plans is not yet available, it will be essential that the 46 plans are screened for AA once available.
Action 6.9	**Mitigation**: The DHLGH will develop a process to ensure that support, funding and coordination of local initiatives undergoes a risk assessment (carried out by LAWPRO or similar) with regard to likely significant effects on any European site, alone or in combination with other plans and projects. The risk assessment will include the requirement to engage with the AA process. **Mitigation**: Given that this is locally driven the most appropriate stage at which to undertake risk assessments is at the LAWPRO level where ecological expertise to support communities is in place to undertake the assessments. **Mitigation**: Assessment will have regard to the Catchment Management Plans (noting the mitigation required in relation to the content of templates noted under Action 6.1. This will ensure a more coordinated approach to local actions. **Mitigation**: The DHLGH will ensure that there is awareness raising and training associated with any funding or support of initiatives to ensure the potential for effects on any European site are understood more widely.
Action 6.11	**Mitigation**: The DHLGH will ensure that there is awareness raising and if necessary training associated with any funding or support of initiatives to ensure the potential for effects on any European site are understood more widely. This should include the development of risk assessment templates by LAWPRO or similar for use in the programme. **Mitigation**: The national citizen science programme will link to the Catchment Management Plans (noting the mitigation required in relation to the content of templates noted under Action 6.1. This will ensure a more coordinated approach to local actions.
Action 6.12 and Action 6.14	**Mitigation:** The consequences of the local initiatives must be considered in project planning (including the requirement (or otherwise) for AA for defined plans or projects) to avoid adverse effects from community engagement initiative. **Mitigation:** To avoid adverse effects on any European site resulting from local initiatives, the DHLGH will develop a process to ensure that support, funding and coordination of local initiatives undergoes a risk assessment (carried out by LAWPRO or similar) with regard to likely significant effects on any European site, alone or in

Section	Mitigation Measures
	combination with other plans and projects. The risk assessment will include the requirement to engage with the AA process. **Mitigation:** Given that this is locally driven the most appropriate stage at which to undertake risk assessments is at the LAWPRO level where ecological expertise to support communities is in place to undertake the assessments. **Mitigation:** Assessment will have regard to the Catchment Management Plans (noting the mitigation required in relation to the content of templates noted under Action 6.1. This will ensure a more coordinated approach to local actions. **Mitigation:** The DHLGH will ensure that there is awareness raising and training associated with any funding or support of initiatives to ensure the potential for effects on any European site are understood more widely. **Mitigation:** All catchment plans or projects shall be subject to the AA process prior to roll out.
Action 6.23	**Mitigation**: The measures shall be subject to the AA process under each sectoral policies / plan prior to their adoption.
Economic Analysis	
Econ 2	**Mitigation**: Proposals must demonstrate that they can be implemented without adverse effects on the integrity of Special Areas of Conservation (SACs) or Special Protection Areas (SPAs), unless there are Imperative Reasons of Overriding Public Interest (IROPI) and no satisfactory alternatives (consistent with Article 6(4) of the Habitats Directive.
Econ 3	**Mitigation**: CRU approvals in relation to investment decisions will need to ensure that AA has been completed by the relevant competent authority as a condition of investment. It is noted that Irish Water has previously applied AA throughout its planning hierarchy to ensure avoidance and mitigation measures can be integrated.
Econ 4	**Mitigation**: Uisce Éireann as the competent authority will need to undertake further AA as more location specific information is included. **Mitigation**: Consent for any proposals arising from the National Water Resources Plan must demonstrate that they can be implemented without adverse effects on the integrity of Special Areas of Conservation (SACs) or Special Protection Areas (SPAs). Where adverse effects from proposals remain following mitigation, in line with Habitats Directive Article 6(3), consent for the proposals cannot be granted unless the prerequisites set by Article 6(4) are met.
Econ 7	**Mitigation**: All investment decisions must be informed by an AA carried out by the relevant competent authority.
Econ 8	**Mitigation**: It is essential that the review and update of the WSSP be subject to Appropriate Assessment, especially given that the previous version identified potential for likely significant effects and an NIS was prepared to inform the AA determination.

Section	Mitigation Measures
	Recommendation: It is recommended that Uisce Éireann review the mitigations from the previous NIS to establish their implementation and effectiveness in order to inform the next plan which will be required to engage with the AA process. **Recommendation**: It is recommended that the WSSP take cognisance of the 46 Catchment Management Plans as soon as they are available, noting the mitigation required under Action 6.1 in terms of template content.
Econ 9	**Mitigation:** AA will be required for the plans. The DHLGH will ensure the AA process is applied to the plans prior to their adoption.
Econ 10	**Mitigation**: Any plans or projects arising from Uisce Éireann being sufficiently funded to develop plans to ensure the security of supply of water resources or to develop sufficient capacity in in drinking or wastewater networks will be subject to Appropriate Assessment, at such time as they are known. **Mitigation**: Proposals must demonstrate that they can be implemented without adverse effects on the integrity of Special Areas of Conservation (SACs) or Special Protection Areas (SPAs), unless there are Imperative Reasons of Overriding Public Interest (IROPI) and no satisfactory alternatives (consistent with Article 6(4) of the Habitats Directive.

9 Conclusions on the RBMP

This Natura Impact Statement (NIS) has considered the potential of the RBMP to give rise to likely significant effects which could adversely affect any European site, with regard to their qualifying interests, associated conservation status and the overall site integrity.

In considering the potential for adverse effects, it has been noted that the RBMP is a strategic and high-level plan, which will inform the preparation of lower tier catchment and sub catchment plans, which will in turn inform specific water body interventions. These lower tier plans and programmes will include additional necessary detail on the form and expression of the RBMP. As such, the RBMP is at the highest level of a hierarchy of plans and programmes.

The RBMP does not determine the precise location of any development project or designate or allocate specific land uses, nor does it preclude the consideration of alternatives. However, a number of pilot projects for which the location is known, and these have been assessed. In light of this and where necessary, a precautionary approach has been adopted by the NIS to ensure that the measures proposed with respect to implementing the measures and actions of the RBMP are, where necessary, subject to Appropriate Assessment. As such, the RBMP itself, subject to it securing the mitigation detailed in Chapter 8, will not adversely affect the integrity of any European site either alone or in combination with other plans or projects.

Notwithstanding this, a precautionary approach has been applied in the plan to ensure that any activities arising from actions referenced in the RBMP do not give rise to adverse effects on the integrity of any European sites. To that end, the plan includes the intrinsic commitment that consent for proposals must demonstrate that they can be implemented without adverse effects on the integrity of Special Areas of Conservation (SACs) or Special Protection Areas (SPAs). Where adverse effects from proposals remain following mitigation, in line with the Habitats Directive Article 6(3), consent for the proposals cannot be granted unless the prerequisites set by Article 6(4) are met. The inclusion of this content in the RBMP serves to set out the legal obligations in relation to activities arising from actions referenced in the RBMP.

In considering ‘in combination’ impacts, it is again emphasised that the RBMP is a high-level strategic plan and for the most part, does not determine the location of any

development project or designate or allocate specific land uses, nor does it preclude the consideration of alternatives.

Having regard to the reasons outlined above and subject to the inclusion of mitigation measures presented in Section 8, it can be concluded that the RBMP would not adversely affect the integrity of a European site (whether individually or in combination with other plans or projects).

10 Determination

Following an analysis of the 3rd Cycle River Basin Management Plan, including in particular, the nature of the changes that could occur and their potential relationship with European Sites, as well as considering other plans and projects, and applying the precautionary principle, in view of the included mitigating provisions therein, the Ecological Assessment Unit[33] of the Department Housing, Local Government and Heritage, in accordance with Regulation 42A(15) of the European Communities (Birds and Natural Habitats) Regulations 2011-2021, make a determination that the 3rd Cycle River Basin Management Plan shall not adversely affect the integrity of a European site.

The EAU is satisfied that a decision to adopt the 3rd Cycle River Basin Management Plan shall not adversely affect the integrity of a European site.

[33] Ryan Wilson-Parr (Head of Ecological Assessment, Department of Housing, Local Government and Heritage) 28th June 2024.

gov.ie/housing

The Department of
Housing, Local Government and Heritage

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

Rialtas na hÉireann
Government of Ireland

Water Action Plan 2024

A River Basin Management Plan for Ireland

Appendix 12: NIS Mitigation Measures

Prepared by the Department of Housing, Local Government and Heritage
www.gov.ie/RBMP

The final mitigation chapter has been revised to reflect the final RBMP proposed for adoption.

It is noted that the RBMP is a strategic plan which sets the framework for and relies to a significant degree on programme and project initiatives to deliver measures on the ground for a more integrated catchment management approach to the management of Ireland's waters. Many of these have already undergone AA or are undergoing AA with development of specific measures which are or will be implemented. The measures committed to in these other plans will be essential to ensuring that the objectives of the RBMP are met and that the RBMP does not have adverse effects on the integrity any European site. The following table presents the required mitigation to address any potential adverse effects identified in the assessment. In addition, recommendations are made to improve the overall coherence of the RBMP and ensure opportunities for alignment with the Habitats and Birds Directives are integrated into the plan.

Acknowledging the high-level nature of the RBMP and the lack of specific detail, it is considered that the following overarching mitigation objectives are included in the RBMP prior to its adoption:

To further improve actions contained under the pressure areas within the RBMP and to address potential negative effects, mitigation measures and recommendations have been proposed for inclusion for specific sections in the final RBMP (see **Table 8-1**).

Table 81: Mitigation Measures outlined for the RBMP

Section	Mitigation Measures
ALL	Overarching Protection 1: It should be kept in mind that the RBMP does not replace or negate the need for other regulatory requirements particular to specific proposal types and scales, Public Bodies, decision-making processes or locations. Such requirements may apply at any stage of a proposal from investigative and feasibility studies to operation. There is an important role for optioneering at all phases of planning and development to avoid environmental impacts. Requirements include relevant environmental assessments such as, inter alia, Strategic Environmental Assessment (SEA), Environmental Impact Assessment (EIA) and Appropriate Assessment (AA), as appropriate. Overarching Protection 2: Proposals must demonstrate that they can be implemented without adverse effects on the integrity of Special Areas of Conservation (SACs) or Special Protection Areas (SPAs). Where adverse effects from proposals remain following mitigation, in line with Habitats Directive Article 6(3), consent for the proposals cannot be granted unless the prerequisites set by Article 6(4) are met. This will require that alternatives have been considered.
Setting Environmental Objectives	
Action 3.1	**Mitigation**: Article 4(5) exemptions must be subject to satisfying strict criteria, where avoidance, substitution, mitigation and management are not feasible. Consideration must also be given to the interrelationship between the Water Framework Directive and the Habitats Directive.
Action 3.2	**Mitigation:** The update of the Climate Adaptation Plan will be subject to Appropriate Assessment process.
Action 3.3	**Mitigation:** The sensitivity analysis must explicitly consider the potential for changes in QI/SCI population ranges and dynamics if adverse effects are to be avoided.
Action 3.5	**Recommendation:** It is recommended that specific research relating to climate change challenges associated with water dependant European sites (including terrestrial habitats which are groundwater dependant) would greatly increase the knowledge base to inform decisions not only on WFD compliance into the future but also Habitat Directive compliance.
Action 3.6	**Mitigation:** Any approach or project relating to Dublin Bay (or any measures arising from the approach or project) will be subject to AA.

Section	Mitigation Measures
Overview of the Programme of Measures	
Action 5.3, 5.4, 5.5 and 5.6	**Mitigation:** The DHLGH will develop a process to ensure that support, funding and coordination of such works and projects undergoes a risk assessment (carried out by LAWPRO or similar) with regard to likely significant effects on any European site, alone or in combination with other plans and projects. The risk assessment will include the requirement to engage with the AA process. **Mitigation:** Given that this is locally driven the most appropriate stage at which to undertake risk assessments is at the LAWPRO level where ecological expertise to support communities is in place to undertake the assessments. **Mitigation:** The DHLGH will ensure that there is awareness raising and training associated with any restoration works, works programmes and projects to ensure the potential for effects on any European site are understood more widely. **Mitigation:** Assessment will have regard to the Catchment Management Plans (noting the mitigation required in relation to the content of templates noted under Action 2.4(1). This will ensure a more coordinated approach to local actions. **Mitigation:** All catchment projects shall be subject to the AA process prior to roll out.
Agriculture	
Agri 1	**Mitigation:** An interim review of the 5th NAP will be undertaken and any required additional measures will be implemented. The output of this review will include a report on water quality assessment and new measure that will be given effect through amendment of the GAP Regulations. **Mitigation**: The 5th NAP was be subject to AA and SEA in its own right and includes mitigation measures for the avoidance of impact to European sites that must be adhered to. **Mitigation**: It is also required to be cognisant of the RBMP; including the mitigations identified within this NIS for the RBMP.
Agri 3	**Mitigation:** The CAP Strategic Plan will need to take full account of the mitigation measures identified in the NIS being prepared for that Plan (under separate cover).
Agri 5	**Mitigation:** Projects must also be guided by sufficient agricultural, biodiversity and catchment science expertise, i.e. ecologist, catchment scientist, agricultural advisor etc.
Agri 8	**Recommendation:** It is recommended that training is provided to ensure the online tool is properly used.
Agri 9	**Mitigation:** The CAP Strategic Plan will need to take full account of the mitigation measures identified in the NIS being prepared for that Plan (under separate cover).
Physical Modifications to the flow, form and/or function of natural surface water bodies	
Hymo 1	**Mitigation:** Consent for any proposals arising from the Hydromorphology Expert Group and the associated National Hydromorphology Programme must demonstrate that they can be implemented without adverse effects on the integrity of Special Areas of Conservation (SACs) or Special Protection Areas (SPAs). Where adverse effects from proposals remain following mitigation, in line with Habitats Directive Article 6(3), consent for the proposals cannot be granted unless the prerequisites set by Article 6(4) are met.
Hymo 2	**Mitigation:** The development of a new legislative regime will not give rise to adverse effects however, the new legislation must formally include the need for protection of European sites, their QI and SCI in decision making and the need for application of the AA process as part of the control regime.
Hymo 3	**Mitigation:** A risk assessment is needed to inform actions that are to be implemented on the ground. Given that specific measures will be decided upon at a more local level the most appropriate stage at which to undertake such assessments is at the IFI level where ecological expertise to support communities is in place to undertake the assessments. **Mitigation:** The DHLGH will ensure that there is awareness raising and training associated with any funding of initiatives to ensure the potential for adverse effects is understood more widely.

Section	Mitigation Measures
Hymo 5	**Mitigation:** Consent for any proposals arising from this feasibility work must demonstrate that they can be implemented without adverse effects on the integrity of Special Areas of Conservation (SACs) or Special Protection Areas (SPAs). Where adverse effects from proposals remain following mitigation, in line with Habitats Directive Article 6(3), consent for the proposals cannot be granted unless the prerequisites set by Article 6(4) are met.
Hymo 6	**Mitigation:** The following reports are outstanding and will be completed when the final design option has been decided: AA Screening, NIS and EcIA. **Mitigation:** Consent for any proposals arising from this process must demonstrate that they can be implemented without adverse effects on the integrity of Special Areas of Conservation (SACs) or Special Protection Areas (SPAs). Where adverse effects from proposals remain following mitigation, in line with Habitats Directive Article 6(3), consent for the proposals cannot be granted unless the prerequisites set by Article 6(4) are met.
Hymo 7	**Mitigation:** The actions once developed shall undergo screening for AA and preparation of an NIS, supported by hydrological modelling if required, to determine if the actions will have adverse effects on any QI/SCI or site integrity and inform the formal determination on AA. All actions proposed will also be informed by ecological impact assessment to ensure no unintended consequences on wider supporting biodiversity. **Mitigation:** Consent for any proposals arising from this feasibility work must demonstrate that they can be implemented without adverse effects on the integrity of Special Areas of Conservation (SACs) or Special Protection Areas (SPAs). Where adverse effects from proposals remain following mitigation, in line with Habitats Directive Article 6(3), consent for the proposals cannot be granted unless the prerequisites set by Article 6(4) are met.
Hymo 8	**Mitigation:** Consent for any proposals arising from this feasibility work must demonstrate that they can be implemented without adverse effects on the integrity of Special Areas of Conservation (SACs) or Special Protection Areas (SPAs). Where adverse effects from proposals remain following mitigation, in line with Habitats Directive Article 6(3), consent for the proposals cannot be granted unless the prerequisites set by Article 6(4) are met.
Forestry	
Forestry 3	**Mitigation:** DAFM to identify areas where conservation forestry practices will be required as a response to existing forestry pressures on known QI/SCI effected by historic forestry activity.
Forestry 4	**Mitigation:** The creation of new forests will need to be outside European sites; unless the activity is directly connected with or necessary to the management of the European Site for nature conservation. **Mitigation:** The creation of new forests outside of European sites, particularly those whose designated interests are hydrologically dependent, will need to demonstrate no adverse effect on the eco-hydrological function of the European site which underpins maintaining the favourable conservation status of the Site and its associated QIs/SCIs. **Recommendation:** It is recommended that the planting of new native woodland is specifically targeted to ensure that ecosystem services benefits are maximised, particularly for high status sites.
Forestry 5	**Mitigation:** Any application of support measures under these schemes must be subject to AA.
Forestry 7	**Mitigation:** All applications for afforestation approval under the Afforestation Scheme 2023-2027 will undergo an environmental assessment procedure. All applications submitted to DAFM will be subject to AA.
Forestry 8	**Mitigation:** Further transparency is required in relation to this measure and clarity on the processes followed, particularly if such forestry-related water incidents lead to damage to European sites, their QI or SCIs. **Mitigation:** DHLGH, working with DAFM will prepare a clear process for the recording and follow up of any forestry related water-incidents with potential for direct or indirect significant effects / adverse impacts on a European site, its QI or SCI. Initially this will require a risk assessment in relation to pathways for impact and consideration of impacts on achieving conservation objectives. Where effects are identified a co-ordinated response including NPWS, EPA, DAFM and DHLGH will be required.

Section	Mitigation Measures
Forestry 10	**Mitigation:** DAFM will integrate into their licensing process, a framework for consideration of in-combination effects at the catchment/ sub-catchment level to better inform AA determinations. **Mitigation:** DAFM to develop a GIS layer showing key forestry constraints including waterbodies at risk from forestry, high status areas, protected areas under WFD (which includes SAC/SPA) and water dependant ecosystems, all of which are available through the WFD app but may not be known or understood by individual applicants. This type of GIS support can inform forestry applications by avoiding high risk areas as a starting point. **Mitigation:** DAFM to develop a risk matrix in relation to forestry impacts on QI/SCI to inform sensitivity analysis.
Urban Wastewater	
UWW 1	**Mitigation:** Wastewater infrastructure is subject to planning and / or licensing of discharges. Both will require AA to inform decision making by the relevant competent authority thereby avoiding and / or mitigating the risk of any adverse effects. **Mitigation:** Any plans or projects arising from Uisce Éireann investment will be subject to Appropriate Assessment, at such time as they are known. **Mitigation:** Consent for any proposals arising from this investment by Uisce Éireann must demonstrate that they can be implemented without adverse effects on the integrity of Special Areas of Conservation (SACs) or Special Protection Areas (SPAs). Where adverse effects from proposals remain following mitigation, in line with Habitats Directive Article 6(3), consent for the proposals cannot be granted unless the prerequisites set by Article 6(4) are met. It is noted that the legal tests in relation to Appropriate Assessment do not allow for cost / economic as a reason to consent or permit adverse effects on any European site.
UWW 2	**Mitigation:** Wastewater infrastructure is subject to planning and / or licensing of discharges. Both will require AA to inform decision making by the relevant competent authority thereby avoiding and / or mitigating the risk of any adverse effects.
UWW 3	**Mitigation:** Wastewater infrastructure is subject to planning and / or licensing of discharges. Both will require AA to inform decision making by the relevant competent authority thereby avoiding and / or mitigating the risk of any adverse effects.
UWW 5	**Mitigation:** All investment decisions must be informed by an AA carried out by the relevant competent authority.
UWW 6	**Mitigation:** These projects will require planning and / or licenses which by law will be subject to AA at the site specific level. **Mitigation:** Any plans or projects arising from Uisce Éireann investment will be subject to Appropriate Assessment, at such time as they are known. **Mitigation:** Consent for any proposals arising from this investment by Uisce Éireann must demonstrate that they can be implemented without adverse effects on the integrity of Special Areas of Conservation (SACs) or Special Protection Areas (SPAs). Where adverse effects from proposals remain following mitigation, in line with Habitats Directive Article 6(3), consent for the proposals cannot be granted unless the prerequisites set by Article 6(4) are met. It is noted that the legal tests in relation to Appropriate Assessment do not allow for cost / economic as a reason to consent or permit adverse effects on any European site.
UWW 7	**Mitigation:** Consent for any proposals arising from this investment by Uisce Éireann must demonstrate that they can be implemented without adverse effects on the integrity of Special Areas of Conservation (SACs) or Special Protection Areas (SPAs). Where adverse effects from proposals remain following mitigation, in line with Habitats Directive Article 6(3), consent for the proposals cannot be granted unless the prerequisites set by Article 6(4) are met. It is noted that the legal tests in relation to Appropriate Assessment do not allow for cost / economic as a reason to consent or permit adverse effects on any European site.

Section	Mitigation Measures
Urban Runoff Pressures	
Urban Runoff 2	**Recommendation:** It is recommended that for complete clarity, the guidance specifically reference compliance with the EU Habitats and Birds Directives and the need for consideration of both Conservation Objectives for any European sites and related WFD Objectives.
Urban Runoff 8	**Mitigation:** All integrated urban drainage management plans will be screened for AA once prepared. The urban drainage management plans will need to contribute positively to achieving, maintaining, and restoring the favourable conservation status of European sites and their associated QIs/SCIs for the area covered by the Plan.
Domestic Wastewater Discharges	
Domestic WW 1	**Mitigation:** Any consent and/or licensing associated with such upgrades must be subject to AA.
Domestic WW 3	**Mitigation:** Where upgrades or new systems are required, there is potential for direct, indirect, construction, operational and cumulative effects on European sites in the absence of mitigation measures. Any consent and/or licensing associated with such upgrades must be subject to AA.
Other Pressures	
Other 2	**Mitigation:** In addition to compliance with the WFD (noting its connection to the Habitats Directive and Birds Directive by way of the Register of Protected Areas) the abstraction licensing process will have to separately show compliance with the Art. 6(3) and if necessary 6(4) of the Habitats Directive and as such will need to be supported by an AA process culminating in an AA determination.
Other 3	**Mitigation:** Any potential for exemptions shall be informed by the AA process in addition to any other assessment processes relevant to decision making. An exemption which leads to adverse effects on site integrity of any European site, alone or in combination, cannot be granted a license. In such a circumstance, where mitigations are not possible, alternatives and IROPI conditions must be met if the project is to proceed.
Peatlands	
Peat 1	**Mitigation:** Any modifications to the plan or indeed preparation of a new Implementation Plan arising out of the mid-term review must be subject to the AA process.
Peat 3	**Mitigation:** Where continued cutting is to be permitted on SAC bogs despite adverse effects on site integrity, an Article 6(4) derogation will be required to support the permission/licensing. This will require that alternatives have considered which include provisions of alternative fuel sources for example. **Mitigation:** Each restoration proposal relating to raised bog SAC will require AA which may in limited cases include consideration of imperative reasons of over-riding public interest where no less damaging alternative can be found.
Peat 6	**Mitigation:** AA screening of the specific actions under the Wild Atlantic Nature project will be required to ensure indirect or ex-situ effects are fully considered.
Drinking Water Source Protection	
Drinking Water 1	**Mitigation**: In addition to compliance with the WFD (noting its connection to the Habitats Directive and Birds Directive by way of the Register of Protected Areas) the licensing process will have to separately show compliance with the Art. 6(3) and if necessary 6(4) of the Habitats Directive and as such will need to be supported by an AA process culminating in an AA determination.
Invasive Alien Species	
Invasive 2	**Mitigation:** Each management plan must undergo AA process to ensure that the pathways for impact are fully understood and accounted for in any actions.
Invasive 5	**Mitigation:** AA screening of projects tackling Invasive Alien Species will be required to ensure these direct, indirect or ex-situ effects are fully considered.

Section	Mitigation Measures
Land-Use Planning	
Land Use 1	**Recommendation:** It is recommended that the training specifically addresses the integration of WFD with the Habitats Directive. Specifically, it should address the issues of overlap, potential for conflicting or more onerous objectives under the different pieces of legislation and the differences in "tests" for assessment purposes under both pieces of legislation.
Land Use 2	**Recommendation:** It is recommended that the legislation clarifies how the requirements of the Habitats Directive are to be considered and the process where conflicts arise.
Implementation and Governance	
Action 6.1	**Mitigation**: To ensure the avoidance of negative effects, the catchment management plan templates must: 1. Be based on evidence regarding the eco-hydrological requirements of relevant European sites; 2. Integrate the requirement to maintain and restore the favourable conservation status of European site QI habitats and species and SCI species pertinent to the Catchment; including identifying actions to secure the delivering of this requirement with respect to a particular Catchment. 3. Contribute to the delivery of the Conservation Objectives of the QI habitats and species and SCI species pertinent to the Catchment; including identifying actions which deliver this contribution. 4. Identify activities within the catchment which prevent or are a threat to delivering (ii) and (iii); the Plan identifying the measures and mechanisms required to remove or reduce the threat – including conformance with relevant existing legislation. In addition, as the content of these plans is not yet available, it will be essential that the 46 plans are screened for AA once available.
Action 6.9	**Mitigation**: The DHLGH will develop a process to ensure that support, funding and coordination of local initiatives undergoes a risk assessment (carried out by LAWPRO or similar) with regard to likely significant effects on any European site, alone or in combination with other plans and projects. The risk assessment will include the requirement to engage with the AA process. **Mitigation**: Given that this is locally driven the most appropriate stage at which to undertake risk assessments is at the LAWPRO level where ecological expertise to support communities is in place to undertake the assessments. **Mitigation**: Assessment will have regard to the Catchment Management Plans (noting the mitigation required in relation to the content of templates noted under Action 6.1. This will ensure a more coordinated approach to local actions. **Mitigation**: The DHLGH will ensure that there is awareness raising and training associated with any funding or support of initiatives to ensure the potential for effects on any European site are understood more widely.
Action 6.11	**Mitigation**: The DHLGH will ensure that there is awareness raising and if necessary training associated with any funding or support of initiatives to ensure the potential for effects on any European site are understood more widely. This should include the development of risk assessment templates by LAWPRO or similar for use in the programme. **Mitigation**: The national citizen science programme will link to the Catchment Management Plans (noting the mitigation required in relation to the content of templates noted under Action 6.1. This will ensure a more coordinated approach to local actions.

Section	Mitigation Measures
Action 6.12 and Action 6.14	**Mitigation:** The consequences of the local initiatives must be considered in project planning (including the requirement (or otherwise) for AA for defined plans or projects) to avoid adverse effects from community engagement initiative. **Mitigation:** To avoid adverse effects on any European site resulting from local initiatives, the DHLGH will develop a process to ensure that support, funding and coordination of local initiatives undergoes a risk assessment (carried out by LAWPRO or similar) with regard to likely significant effects on any European site, alone or in combination with other plans and projects. The risk assessment will include the requirement to engage with the AA process. **Mitigation:** Given that this is locally driven the most appropriate stage at which to undertake risk assessments is at the LAWPRO level where ecological expertise to support communities is in place to undertake the assessments. **Mitigation:** Assessment will have regard to the Catchment Management Plans (noting the mitigation required in relation to the content of templates noted under Action 6.1. This will ensure a more coordinated approach to local actions. **Mitigation:** The DHLGH will ensure that there is awareness raising and training associated with any funding or support of initiatives to ensure the potential for effects on any European site are understood more widely. **Mitigation:** All catchment plans or projects shall be subject to the AA process prior to roll out.
Action 6.23	**Mitigation**: The measures shall be subject to the AA process under each sectoral policies / plan prior to their adoption.
Economic Analysis	
Econ 2	**Mitigation**: Proposals must demonstrate that they can be implemented without adverse effects on the integrity of Special Areas of Conservation (SACs) or Special Protection Areas (SPAs), unless there are Imperative Reasons of Overriding Public Interest (IROPI) and no satisfactory alternatives (consistent with Article 6(4) of the Habitats Directive.
Econ 3	**Mitigation**: CRU approvals in relation to investment decisions will need to ensure that AA has been completed by the relevant competent authority as a condition of investment. It is noted that Irish Water has previously applied AA throughout its planning hierarchy to ensure avoidance and mitigation measures can be integrated.
Econ 4	**Mitigation**: Uisce Éireann as the competent authority will need to undertake further AA as more location specific information is included. **Mitigation**: Consent for any proposals arising from the National Water Resources Plan must demonstrate that they can be implemented without adverse effects on the integrity of Special Areas of Conservation (SACs) or Special Protection Areas (SPAs). Where adverse effects from proposals remain following mitigation, in line with Habitats Directive Article 6(3), consent for the proposals cannot be granted unless the prerequisites set by Article 6(4) are met.
Econ 7	**Mitigation**: All investment decisions must be informed by an AA carried out by the relevant competent authority.
Econ 8	**Mitigation**: It is essential that the review and update of the WSSP be subject to Appropriate Assessment, especially given that the previous version identified potential for likely significant effects and an NIS was prepared to inform the AA determination. **Recommendation**: It is recommended that Uisce Éireann review the mitigations from the previous NIS to establish their implementation and effectiveness in order to inform the next plan which will be required to engage with the AA process. **Recommendation**: It is recommended that the WSSP take cognisance of the 46 Catchment Management Plans as soon as they are available, noting the mitigation required under Action 6.1 in terms of template content.
Econ 9	**Mitigation:** AA will be required for the plans. The DHLGH will ensure the AA process is applied to the plans prior to their adoption.

Section	Mitigation Measures
Econ 10	**Mitigation**: Any plans or projects arising from Uisce Éireann being sufficiently funded to develop plans to ensure the security of supply of water resources or to develop sufficient capacity in in drinking or wastewater networks will be subject to Appropriate Assessment, at such time as they are known. **Mitigation**: Proposals must demonstrate that they can be implemented without adverse effects on the integrity of Special Areas of Conservation (SACs) or Special Protection Areas (SPAs), unless there are Imperative Reasons of Overriding Public Interest (IROPI) and no satisfactory alternatives (consistent with Article 6(4) of the Habitats Directive.

www.gov.ie/RBMP

Department of Housing,
Local Government and Heritage

Rialtas na hÉireann
Government of Ireland