

Digest of Submissions –South Eastern RBD



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1.0 Introduction

A draft River Basin Management Plans for the South Eastern River Basin District was published on the 22nd December 2008, and was subject to public consultation for six months until 22nd June 2009. This report summarises the submissions made on the draft plan during that period and presents the responses to those submissions.

1.1 Background

The EU Water Framework Directive (2000/60/EC) (WFD) was adopted in 2000 and has been transposed into Irish law by the European Communities (Water Policy) Regulations 2003 (S.I. No. 722 of 2003 as amended). It establishes a framework for community action in the field of water policy. The WFD requires that Member States manage their waters on the basis of River Basin Districts (RBDs) and requires the preparation of River Basin Management Plans for all of the waters in the RBDs. Some 400 river basins on the island of Ireland have been grouped and assigned to a total of eight RBDs; one of these lies wholly in Northern Ireland, four lie wholly Ireland and three are International River Basin Districts (IRBDs) because their catchments lie partly in Ireland and partly in Northern Ireland. The South Eastern River Basin District (SERBD) lies wholly in Ireland.

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

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

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

Article 14 of the WFD requires Member States to encourage active public involvement in the development of river basin management plans. A summary of consultations on the

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draft RBMP, any inputs from the SEA process, and updates arising, will be included in the final RBMPs.

Table 1.1 Implementation Timeline of the Water Framework Directive

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

1.2 Consultation and Participation Activities

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

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As part of the consultation process a series of public information events were held in the district. These events took place between 20th April 2009 and 5th May 2009. Venues and dates at which they took place are listed below.

Table 1.2 - Public Consultation Meetings

Date	Location	Venue
Monday 20 th April 2009	Carlow	Central Library, Tullow Street, Carlow, County Carlow
Thursday 23 rd April 2009	Wexford	Wexford County Council, Enniscorthy District Office, Old Dublin Road, Enniscorthy, County Wexford
Monday 27 th April 2009	Clonmel	Clonmel Library, Emmett Street, Clonmel, County Tipperary
Tuesday 28 th April 2009	Portlaoise	Council Chamber, Áras an Chontae, Portlaoise, County Laois
Thursday 30 th April 2009	Waterford	Central Library, Lady Lane, Waterford, County Waterford
Tuesday 5 th May	Kilkenny	Council Chamber, County Hall, John Street, Kilkenny, County Kilkenny

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

1.3 Scope of the digest

This digest is a compilation of written submissions received during the consultation period, including completed questionnaires and comments made at public meetings. Responses have been made to submissions, and all are being considered during the development of the final river basin management plans. This digest of submissions and responses is being distributed to those who took part in the process and other interested parties, and will also be available at www.serbd.com and www.wfdireland.ie.

2.0 Summary of submissions

2.1 Written Submissions Referencing system

A total of **44** submissions were received in relation to the South Eastern River Basin District, including written submissions, comments and questionnaires. Table 3 lists the organizations and individuals that made submissions during the consultation process.

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

Table 2.1 - Organisations and Reference Codes for submissions

No.	Organisation	Ref Codes
1	An Taisce	SE_RBMP_041
2	Birdwatch Ireland	SE_RBMP_035
3	Central Fisheries Board (CFB)	SE_RBMP_036
4	Eastern Regional Fisheries Board (ERBD)	SE_RBMP_045
5	Southern Regional Fisheries Board (SRFB)	SE_RBMP_044
6	Offaly County Council	SE_RBMP_033
7	Kildare County Council	SE_RBMP_039
8	Wexford County Council	SE_RBMP_022
9	Kilkenny County Council	SE_RBMP_007
10	Laois County Council	SE_RBMP_025
11	Waterford County Council	SE_RBMP_046
12	Carlow County Council	SE_RBMP_023
13	South Tipperary County Council	SE_RBMP_014
14	Department of Agriculture, Fisheries and Food (DAFF)	SE_RBMP_013
15	Department of Communication, Energy and Natural Resources	SE_RBMP_042
16	Environmental Protection Agency (EPA)	SE_RBMP_043
17	Geological Survey of Ireland (GSI)	SE_RBMP_036
18	Bord na Mona	SE_RBMP_012
	Coillte	SE_RBMP_019
19	Failte Ireland	SE_RBMP_047
20	Geological Survey Ireland (GSI)	SE_RBMP_048
21	Irish Creamery Milk Suppliers Association (ICMSA)	SE_RBMP_054
22	Irish Farmers Association (IFA)	SE_RBMP_032 SE_RBMP_027 SE_RBMP_029 SE_RBMP_030 SE_RBMP_018
23	Irish Farmers Association (IFA) (Laois)	SE_RBMP_017
24	Irish Farmers Federation (IFF)	SE_RBMP_026
25	Irish Wildlife Trust (IWT)	SE_RBMP_020
26	Irish Wildlife Trust (IWT) (Waterford branch)	SE_RBMP_024
27	Office of Public Works (OPW)	SE_RBMP_030
28	Shay Murtagh Ltd	SE_RBMP_015
29	Sustainable Water Network (SWAN)	SE_RBMP_052

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No.	Organisation	Ref Codes
30	Teagasc	SE_RBMP_055
31	Animal and Plant Health Association	SE_RBMP_005
32	Maxpro	SE_RBMP_0
33	National Roads Association	SE_RBMP_0
34	Port of Waterford Company	SE_RBMP_051
35	Waterways Ireland	SE_RBMP_049
36	Athy WWTP	SE_RBMP_010
37	The Heritage Council	SE_RBMP_004
38	IBEC	SE_RBMP_048
39	Cllr Declan McPartlin	SE_RBMP_050
40	Member of the public	SE_RBMP_021
41	Member of the public	SE_RBMP_009
42	Member of the public	SE_RBMP_028
43	Member of the public	SE_RBMP_037
44	Member of the public	SE_RBMP_006

2.2 Topics covered

Issues raised in written submissions, questionnaires and comments received were abstracted and were collated by:

- Issues related to key national topics:
 - ◆ Wastewater and industrial discharges
 - ◆ Landfills, quarries, mines and contaminated lands
 - ◆ Agriculture
 - ◆ Wastewater from unsewered properties
 - ◆ Forestry
 - ◆ Usage and discharge of dangerous substances
 - ◆ Physical modifications
 - ◆ Abstractions
 - ◆ Locally focused and future issues including:
 - ◆ Climate Change
 - ◆ Aquaculture
 - ◆ Invasive Alien Species
 - ◆ Protecting High Quality Areas

- Other issues:
 - ◆ Cruising, Boating & Recreation
 - ◆ Shared Water Issues
 - ◆ Public Participation
 - ◆ Economics
 - ◆ Implementation
 - ◆ Additional Issues
 - ◆ Basic & Supplementary Measures
 - ◆ Extended Deadlines
 - ◆ Integration with other Plans
 - ◆ Website/Watermaps

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- ◆ Waterbody Specific Issues
- ◆ Editorial Issues

3.0 Issues raised and Responses

3.1 Referencing Systems

3.1 Summary Table of Public Consultation Key Submissions and Responses

Table 3.1 briefly summarises the broad categories of comment received and outlines the general nature of the response.

Table 3.1 Summary of Public Participation Key Submissions and Responses

<p>Comments on additional measures: Some supplementary measures were suggested to deal with key issues for example water conservation, reedbeds or constructed wetlands.</p>	<p>Response: these measures either already were or have since been screened under the Strategic Environmental Assessment as reduction, remediation or relocation options forming part of the suite of plan measures.</p>
<p>Comments reflecting differing views: There were differing views regarding some topics, for example agricultural sectoral representatives stated that possible supplementary measures should not be included whilst environmental groups commented that it was not adequate to await agricultural catchment study findings before selecting from such measures. A similar range of views were expressed regarding forestry measures along with suggestions regarding their wording.</p>	<p>Response: These comments have been considered and the measures updated where appropriate.</p>
<p>Comments on local issues: There were a number of submissions focusing on more localised issues and commenting on, or raising questions about, particular waterbodies or suggesting additional topics.</p>	<p>Response: This digest clarifies the measures in relation to these additional topics such as wind farms, which mainly fall within the existing regulatory system.</p>
<p>Comments on key issues: Submissions also highlighted the need to further clarify some key issues or measures for example regarding aquaculture pressures, climate change or planning controls.</p>	<p>Response: Clarification text and updates on climate change approaches under the Water Framework Directive have been provided in the final plan.</p>
<p>Comments on public participation: The public participation issue attracted a good deal of comment with suggestions of inclusion of all parties in the decision making and implementation processes. Additional aspects of water management (for example biodiversity) were suggested for the awareness programme. The level of interest in accessibility of background information and mapping further reinforced the need for ongoing support to public</p>	<p>Response: Water Management Unit Action Plans have been developed which bring more focus to where key actions are required on a local (i.e. sub-catchment) basis. Further development of the Water Maps tool has taken place and the education and awareness programme remains part of the suite of measures.</p>

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

3.2 Submissions and Responses

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

3.2.1 Wastewater and Industrial Discharges

Organisation	Wastewater & Industrial Discharge	Responses
CENTRAL FISHERIES BOARD SE_RBMP_036	There are particular concerns that because of increased urbanization in recent years that the pace of investment in wastewater treatment infrastructure has lagged behind development, in particular issues have arisen in relation to the increased frequency of use of storm outfalls. There is a concern that the cumulative impact of discharges from on site wastewater treatment systems facilitated by local authorities is impacting water quality. As many of the local authority sewage outfalls are to water designated SACs, there is a need for stricter elv's to be applied.	This comment has been noted
EPA SE_RBMP_043	Prioritised list of UWWTPs for each RBD, that require upgrade or improved operation, to be listed with indication of completion date.	A prioritised list has been developed in support of the final plan and reported in a background document.
IFF SE_RBMP_026	Request for all local authorities elected members to have the application of all municipal sludge on lands banned. Why has the Food Safety Authority taken so long in having the risk analysis of land spreading of human excrement carried out. Pathogenic micro-organism and heavy metal and chemical contamination of sewage treatment methods needs to be evaluated. DEHLG administrative problems have resulted in delays to the EU Sewage Sludge Directive update and revision.	RBMP requires compliance with all basic measures including the sludge directive
SWAN SE_RBMP_052	No new development should be permitted unless adequate sewage treatment capacity is in place before permission is granted	This is already included as a measure
	For new settlements, isolated gated communities and other isolated commercial developments, waste treatment facilities must not be permitted to discharge to watercourses but should be impounded and transported direct to wastewater treatment plants.	This is included as part of the Urban Waste Water Discharge Licensing process (appropriate treatment)
	DEHLG must resource sewage treatment capacity to handle the additional load created by requirements to desludge septic tanks	This comment has been noted and forwarded to DEHLG for consideration

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Organisation	Wastewater & Industrial Discharge	Responses
	The RBDMP must provide full information on monitoring sites and frequencies, and ensure that waters receiving municipal wastewater treatment discharges are continuously monitored	Link to monitoring programme
	The Plan must set out clearly the measure to be taken to tackle heightened hormone levels in water bodies.	This has been addressed through EPA study into endocrine disruptors in the Irish Aquatic Environment. Please refer to report below and summary conclusions available on EPA site ENDOCRINE DISRUPTORS IN THE IRISH AQUATIC ENVIRONMENT for any further insight into this matter. There is insufficient information available at present. Technical issues to be addressed before comprehensive measures can be put in place
Athy WWTP SE_RBMP_010	A valuable improvement on current practice would be if discharges from plants went through open ditches rather than closed pipelines then extra treatment is achieved and the river is further protected	This comment has been noted and forwarded to the EPA for consideration
EASTERN REGIONAL FISHERIES BOARD SE_RBMP_045	Development in an area must be in line at all times with current available capacity in the relevant WWTP	This is already included as a measure
	Treated effluent from local WWTP discharging to surface waters should comply at all times with the requirements of the Urban Wastewater Treatment Directive, WFD, Fisheries and other relevant legislation	This comment has been noted
	The issue of microbiological contamination must be fully considered and incorporated in any licensing procedure	This comment has been noted and forwarded to the EPA for consideration
SOUTHERN REGIONAL FISHERIES BOARD SE_RBMP_044	It is of concern that the Draft Plan has failed to specify in order of importance the priority locations for investment in terms of sewage treatment infrastructure	Priority locations for investment will be available following compilation of the implementation programmes for the Districts
IRISH WILDLIFE TRUST WATERFORD BRANCH SE_RBMP_024	In the future, farmyards, housing estates, retail developments and roads will have to function as individual stormwater treatment facilities	This comment has been noted
	Proper controls will have to be mandated to the various premises and installations that discharge water from their operations to watercourses	Existing controls are available under the Water Pollution Acts

3.2.2 Landfills, Quarries, Mines and Contaminated Land

Organisation	Landfills, Quarries, Mines	Responses
AN TAISCE SE_RBMP_041	The threat of contamination from landfill leachate is not accounted for.	This has been included in risk assessments in the section on landfills within the RBMP

Organisation	Landfills, Quarries, Mines	Responses
SWAN SE_RBMP_052	More detail with regard to addressing pollution from these sites is required. With regard to landfills and contaminated lands, SWAN notes that the Plan is reiterating the proposals for further investigations put forward in 'Water Matters' in 2007. Surely, for some well known problematic sites, e.g. illegal landfills, its time to take action, rather than waiting for results of research.	Action has been progressed via IPPC licensing system for (contaminated lands) and the Code of Practice (landfills) - these are site specific not general research investigations. Information is available from the relevant authorities
EASTERN REGIONAL FISHERIES BOARD SE_RBMP_045	Best available technology (BAT) mitigation measures should be implemented to ensure protection of the surface water and groundwater systems during both construction and operational programmes at these features The implementation of SUDS systems on these sites is highly desirable both in the short and long term	The planning, licensing, EIA and enforcement are included in the basic measures. Full compliance with basic measures is a requirement of the RBMP.

3.2.3 Agriculture

Organisation	Agriculture	Responses
AN TAISCE SE_RBMP_041	<p>The adverse impacts of the fertilisers used in agriculture are perhaps not fully understood by all users, nor is the issue of cumulative impacts highlighted adequately.</p> <p>A low cost/no cost advisory service that provides good information to farmers would be an extremely useful initiative to be developed</p> <p>A major problem of farm waste holding facilities has recently come to light. These waste holding facilities are now installed and they have allowed for more waste to be generated yet they can often accommodate more waste than the land has capacity to absorb.</p> <p>Alternative disposal mechanisms for slurry (and municipal sludge) other than land spreading need to be provided.</p> <p>For farms in REPS there should be more emphasis on minimising slurry production and less on support for slurry storage.</p> <p>Additional financial incentives, such as bonuses, must be provided to encourage and promote environmentally sensitive farming.</p> <p>Farm checks under the (<i>European Communities (Good Agricultural Practice for Protection of Waters) Regulations 2006</i>), should be on-the-spot and without prior notice</p> <p>Slurry spreading (volume and inappropriate practices) must be reduced and controlled through the establishment and proper enforcement of appropriate agricultural bye-laws,</p>	The Sewage sludge Regulations & the GAP Regulations are identified as basic measures within the plan and the GAP agricultural catchment programme will identify the role of further agricultural measures

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Organisation	Agriculture	Responses
	<p>Bio-digesters should be able to handle excess slurry waste</p> <p>Horticulture and its related problems are not addressed by the Draft Plan at all and require specific additional measures to tackle the many water issues associated with intensive horticulture.</p> <p>Controls should be placed on the amount of fertilisers that can be purchased</p> <p>The REPS scheme should have more measures integrated with it to help protect water bodies.</p> <p>The filling and cleaning of slurry tanks and spreader tanks filling and cleaning, and cleaning of spreading equipment from water bodies, particularly lakes, is a significant threat, due to risk of leakage and should be prohibited so as to avoid contamination. Support systems are urgently needed to facilitate these activities to be done in a way that is not polluting.</p>	
		Release of polluting material to waters is governed by basic measures including Water Pollution and GAP Regulations
CENTRAL FISHERIES BOARD SE_RBMP_036	There are fears that the slurry storage periods prescribed in the Good Agricultural Practise Regulations, 2009 will not be adequate in order to fully protect important salmonid waters.	The GAP Agricultural catchments projects will evaluate this issue
DAFF SE_RBMP_013	The listing of 'over-grazing remediation' for consideration as a supplementary measure in respect of agriculture is inappropriate in view of the fact that DAFF has worked closely with the National Parks and Wildlife Service in the preparation and publication of Commonage Framework Plans.	This has been included in the measures. Responsibilities have not yet been determined
EPA SE_RBMP_043	Programme for Farm Inspections for West should be set out. (Strongly Recommended)	This issue of farm surveys is an implementation issue and is being considered by the relevant Government Departments
THE HERITAGE COUNCIL SE_RBMP_004	Suggest that DAFF undertake a programme to rehabilitate rivers affected by overgrazing, while also ensuring there are sufficient direct measures in place to reduce over-grazing itself.	This has been included in the measures. Responsibilities have not yet been determined
IFA SE_RBMP_032 SE_RBMP_027 SE_RBMP_029 SE_RBMP_030 SE_RBMP_018	IFA welcomes agreement between Department of Agriculture and the DOE on the DOA Inspectors undertaking the Nitrates Regulations Inspections. Now essential that agreement is communicated and enacted by all County Councils and public bodies	This issue of farm surveys is an implementation issue and is being considered by the relevant Government Departments

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Organisation	Agriculture	Responses
ICMSA SE_RBMP_054	ICMSA strongly believe that there should be only one set of regulations and inspections under the Nitrates Regulations and that under no circumstances should any further supplementary measures be placed on the sector.	This issue of farm surveys is an implementation issue and is being considered by the relevant Government Departments
	ICMSA think it is crucial that all bodies are cognisant of the period involved in achieving measurable benefits in terms of the effectiveness of the National Action Programme.	Work to evaluate the scientific basis for efficacy of measures and lag-time for recovery in water quality will be completed to support extended deadlines for some waterbodies impacted by agriculture in the final RBMP
SWAN SE_RBMP_052	If DAFF are to take responsibility for enforcing the GAP regulations, DEHLG must retain an overseeing role in ensuring this is carried out correctly and effectively and is not in any way influenced by DAFF's close relationship and affinity with the agriculture sector.	This is an implementation issue and is being considered by the relevant Government Departments
TEAGASC SE_RBMP_055	Concern that 'lag time' between implementation of agri-environmental measures and improvement of water quality, is not sufficiently accounted for, the RBMPs may prematurely accommodate the implementation of unnecessarily stringent supplementary measure for the agriculture sector.	Work to evaluate the scientific basis for efficacy of measures and lag-time for recovery in water quality will be completed to support extended deadlines for some waterbodies impacted by agriculture in the final RBMP.
	National Action Programme under the Nitrates Directive (SI 378 of 2008 and SI 101 of 2009) will form the main Basic Measure for the Agri sector. NAP review in 2010 will be evaluation of implementation of f NAP and not its effectiveness	This comment has been noted
Tim Gleeson SE_RBMP_021	Allowing farmers to construct simple cost effective liquid manure storage would in my experience eliminate almost all agricultural sources of water pollution. Regulations should encourage rather than make difficult this objective.	The Gap Regulations are basic agricultural measures within the plan and the GAP agricultural catchment programme will identify the role of further agricultural measures
Animal and Plant Health Association SE_RBMP_005	How can agriculture cause water problems?	Nutrients (Nitrogen and Phosphorus) can be carried into waters from farmyards, from manures store leaks or from fields treated with nutrient-rich organic and chemical fertilisers.
IRISH WILDLIFE TRUST SE_RBMP_020	Horticulture activities are not addressed in the Nitrate Directive and no measure in the Draft Plans that address this significant source of potential water pollution.	RBMP details that controls are in place for dangerous substances and Water Pollution Regulations are addressed through basic measures. Control of dangerous substances and Water Pollution Regulations are addressed through RBMP basic measures.
	Agriculture has no additional measures proposed until review of GAP Regulations in 2010 which is after the RBMPs have been finalised. This is	The GAP Agricultural catchments projects will evaluate this issue

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Organisation	Agriculture	Responses
	not adequate.	
Offaly County Council SE_RBMP_033	Improved co-ordination between the Department of Agriculture and Food and the Department of the Environment, Heritage and Local Government in implementing the Good Agricultural Practices regulations would improve the efficiency of implementation of the regulations and address the concerns of the agricultural sector	This comment has been noted
	High concentrations of Phosphorus and Ammonium have been observed in water bodies associated with peatlands. This may be a natural phenomenon and therefore an exemption should be sought.	This comment has been noted and forwarded to the EPA for consideration
	Greater co-operation is required between Local Authorities in carrying out farm surveys in areas straddling county boundaries	This issue of farm surveys is an implementation issue and is being considered by the relevant Government Departments
IFA_LAOIS SE_RBMP_017	We totally reject any proposal to prevent farmers from using watercourses for livestock under REPS	The Sewage Sludge Regulations & the GAP Regulations are identified as basic measures within the plan and the GAP agricultural catchment programme will identify the role of further agricultural measures
EASTERN REGIONAL FISHERIES BOARD SE_RBMP_045	It is our opinion that the basic measures are proving to be ineffective, which highlights the need for the application of supplementary measures	The GAP Agricultural catchments projects will evaluate this issue
Kildare County Council SE_RBMP_039	A measure to address the issue of siltation in rivers in certain waterbodies caused by overland sediment run-off from lands ploughed to the river banks should be included in the Plan	These are included in the possible measures
Wexford County Council SE_RBMP_022	The nutrient limit values for dissolved inorganic nitrogen in fresh water bodies have not been proposed	The EPA will further develop the classification system as soon as sufficient data becomes available
	Wexford County Council consider that a target similar to the EU Directive on the Quality of Water for Human Consumption guide level of 5.63mg/l may be a realistic target for fresh waters, given that phosphate, not nitrate, is the limiting nutrient for eutrophication in fresh and estuarine waters	This comment has been noted. However, it should be noted that phosphate is not always the limiting nutrient
IRISH WILDLIFE TRUST WATERFORD BRANCH SE_RBMP_024	The "refined" farm management practices as set out in the basic measures will not achieve the objectives of the good status for water as set out in the WFD	The comment has been noted and forwarded to the EPA

3.2.4 Wastewater from Unsewered Properties

Organisation	Wastewater from unsewered properties	Responses
AN TAISCE SE_RBMP_041	The Draft Plan needs to specifically address the issue of contamination through private waste water systems not working efficiently.	This is included in the measures
SWAN SE_RBMP_052	Proprietary treatment systems must be mandatory in all permissions for new one-off housing where soil percolation/assimilative capacity is insufficient.	Appropriate treatment is recommended for on-site systems
	Bye-laws (as in County Cavan) requiring certified annual de-sludging of septic tanks must be mandatory	Consideration of bye-laws is an issue for individual local authorities
	A modest grant scheme to support the obligatory replacement of demonstrably failing septic tanks must be initiated in Protected Areas	This has been forwarded to the DEHLG for consideration
	Site assessment should be independently carried out, commissioned by the planning authorities in the case of private developments in order to avoid unduly pressure on companies doing site assessments.	Included in measures
IBEC SE_RBMP_048	IBEC considers it vital that diffuse discharges from agricultural sources and wastewater from unsewered properties are targeted to ensure the achievement of the WFD	This comment has been noted.
Kilkenny County Council SE_RBMP_007	Kilkenny County Council respectfully requests that the RBMP supports the introduction of a state sponsored rehabilitation programme for on-site waste water treatment systems	This has been forwarded to the DEHLG for consideration
Cllr Declan MacPartlin SE_RBMP_050	There is a need to introduce mandatory inspection of septic tanks	This comment has been noted and forwarded to the EPA for consideration
	It is unacceptable that, for instance, the SERFB could tell Wexford County Council, that irrespective of what status the EPA determines a river to have, that the Board will object to discharge licences for one-off houses even if the waters are deemed to be pristine	This comment has been noted
EASTERN REGIONAL FISHERIES BOARD SE_RBMP_045	We believe that numbers of S4 discharges known to the SERBD in County Wexford is a considerable underestimation of the true figure and that this is a significant issue	Wexford County Council have implemented an active program of section 4 licensing and review. Prioritisation of inspection is done on an environmental impact bases.
	The Board requests that enforcement of this issue be prioritised to focus on the direct discharges to surface waters from unsewered properties	

3.2.5 Forestry

Organisation	Forestry	Responses
AN TAISCE SE_RBMP_041	If the damage from Forestry to water quality is to end, all supplementary measures in the draft plan need to be implemented without further delay (i.e. 2010). It is also important to include in the Plan that the choice of silvicultural system and forest management have a much larger role	In the background document for Forest and Water it was clearly indicated that some measures will require their effectiveness to be assessed through further research and field trials before full implementation. Measures included in the plans were proposed as a suite of measures the most appropriate of which should be used following site specific assessments. Further research is being undertaken through the HYDROFOR Project funded by COFORD and the EPA. This research is focused at catchment scale and will test the effectiveness of some of the proposed measures. It is also not possible to implement all measures immediately due to the complex nature of forest and water interaction. Some measures such as felling and no replanting may result in nutrient enrichment problems due to the decay of brash and root structures left behind by the harvesting process for example.
	The problems associated with forestry have been so simplified by the Draft Plan they do not highlight the severity of some of water quality problems arising from past and current forest management practices.	The background document for Forest and Water clearly set out the issues and potential impacts that forests and forestry operations can have on water quality. The measures were designed to address these potential impacts.
	The report does not adequately emphasise the impacts of forestry plantations on native species and habitat loss	The WFD focuses on water quality aspects only and on these habitats and species dependent on water quality.
	There is a lack of the application of the precautionary principle in forestry operations, and while guidelines are meant to deliver safeguards there is little enforcement of 'best practice' guidance, in addition to the guidance being outdated, inadequate to deliver good water quality objectives, and contradictory.	This comment has been noted
	Whilst the control of aerial fertiliser spreading over forestry from helicopters or aeroplanes through licensing regulations is a welcome step, it is An Taisce's position that it should be totally prohibited.	This comment has been noted
	The current approach of the Draft Plan to be apply more stringent measures in the most sensitive areas is nether comprehensive nor does it tackle wider issues of water quality deterioration from forestry outside of 'the prioritised areas'.	Separate specific sub basin plans are been prepared for the protection of sensitive areas, specifically for the Freshwater Pearl Mussel Catchments in designated cSAC areas. The water quality requirements in these areas are more stringent and any forestry operations must comply fully with these requirements. The draft sub Basin Plans for FPM Catchments have additional forestry measures (www.wfdireland.ie)
	As previously mentioned the RBD needs a far more proactive approach be taken, as this will ensure that the forest service (and other responsible authorities) adopt comprehensive and cohesive preventative measures to avoid water pollution from forestry, in accordance with various European policy requirements.	RBD Conservation Groups are being established to coordinate activities relating to sensitive catchments in each RBD.

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Organisation	Forestry	Responses
	Ireland needs to urgently move away from the over reliance on alien exotic conifers which are the source of the many water quality problems. Instead of the Draft Plan 'encouraging sustainable, commercial afforestation', it should be encouraging sustainable (i.e. socially, environmentally, and economically), forestry, including a major restructuring of the state forest holding and more balanced incentives for private afforestation.	This comment has been noted
	Forestry Grant Applications should be mapped by Department of Agriculture & Food in to a GIS format, that could be used alongside the watermaps tool. This would assist in the identification of impacts of forestry in upland areas which source river systems.	Forestry Grant Applications are currently mapped through the DAFF Forest Service IFORIS System. All forestry grant applications are made online to this mapping system. This allows the Forest Service to review the likely potential impacts and decide on their suitability. In addition mapping from the WFD has been provided to the Forest Service, to enable them to assess potential impacts of new forest grant applications.
CENTRAL FISHERIES BOARD SE_RBMP_036	There is a need to re-align forest management plans with the river basin plans and in particular to ensure that supplementary measures in relation to forestry are applied.	Noted. Additionally specific forestry management plans will be required for sensitive catchments such as the Freshwater Pearl Mussel (<i>Margaritifera margaritifera</i>) catchments for which specific management plans have been prepared (www.wfdireland.ie)
COILLTE SE_RBMP_019	<p>S2: Strict adoption of Water Protection Guidelines would not pose same risk to water quality as previous to them. Coillte has serious reservations on restriction of forest cover on 1st and 2nd order streams in acid sensitive catchments.</p> <p>S3: Only by proper measuring the levels of pollution, combined with determining the acid sensitivity of the receiving waters can the most appropriate decision be made on the tolerable limit of forest cover in a sensitive catchment.</p> <p>S4: Improved peats has an excellent potential for forest growth with minimal impact on water quality subject to strict adherence with Forest Service Guidelines. Approx 70,000 hectares would be deforested if this measure was implemented as currently drafted.</p> <p>S5: Too general. This measure s/b deleted or merged with S4</p> <p>S6: More practical alternative would be to determine the percentage of a WB that can be felled over a three year period rather than capping the felling coup size.</p> <p>S7: The best time to restructure a forest stand is after clearfelling. It is at this stage of the forest cycle that riparian zones are installed and drainage layout modified to comply with current Forest Service Guidelines. The feasibility of implementing a revised drainage layout and establishing riparian zones in a semi-mature no thin crop can only be considered on a site by site basis. Cognisance must be taken that the stability of the entire stand can be severely comprised arising from the implementation of these measures, the attendant and potentially serious impacts on the local water</p>	The proposed measures were identified by a Working Group comprising experts from Forest Service, Coillte Teoranta, COFORD, NPWS, EPA, Fisheries, Local Authorities, RBD Consultants and International Experts and Academics. The measures identified were supported by research undertaken by UCD and UCC as part of the measures development and establishment of cause and effect. The Working Group recognised that some of the proposed measures would be required to be trialled out at a catchment scale to determine their effectiveness. Some further research is being undertaken under the HYDROFOR Project.

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Organisation	Forestry	Responses
	body and the considerable economic cost associated with this measure.	
	S8: Under current Coillte Best Management Practice, the drainage network of a stand is reviewed as part of the Environmental Impact Assessment prior to harvesting and subsequent re-stocking. Consideration is given to the best measures to be adopted to minimise the impact on the receiving local water body (ies) during and after the forest operations. This document is under constant review at this time and subject to alteration, change and further addition as the forest operations progress and additional protection measures are identified, implemented and documented.	
	S9: This measure should merged with S10, S11 and S23 and form part of an Integrated Pest Management plan for each Forest Property, including delaying re-stocking by 3 to 5 years (fallowing), use of pre-dipped plants, reduced pesticide usage and experimenting with alternate biological control methods.	
	S12: This issue could be addressed if the location of the impacted water bodies were made known to Coillte and could be included in the relevant Forest Management Plans. Consideration should also be given for the relaxing of the Forest Service regulation of re-stocking sites within two years of felling to up to five years to facilitate greater diversity in age classes in the forest stand.	
	S13: Coillte would have serious reservations on the efficacy of the above measure to mitigate impacts in acid sensitive areas. The long-term benefits of liming Irish waters has not been demonstrated and thus would be of little use to the Forest Manager/Practioner in buffering acid sensitive waters. Arising from the uncertainties surrounding this measure, it should be omitted from the suite measures and subject to further research.	
	S14: Similar to S13, this measure warrants further research prior to adoption in the field.	
	S15: While Coillte would be highly supportive of this measure, the cost of fencing and weed control would be very costly and would require grant aid if it was to be implemented across the whole estate.	
	S16: Where possible, Coillte will endeavour to install buffer zones in stands that were planted prior to the Guidelines. This issue can only be addressed on a site by site basis, the prime requisite been to minimise the impact on the water quality of the adjacent watercourses. The installation of buffer zones on 'no thin' semi-mature crops will be the most problematic and one that will require further research on how it can be implemented practically without de-stabilising the remaining crop and resulting in significant silt and nutrient runoff. To that end, a COFORD funded Woodlands of Ireland led project on Riparian Zones should provide the forest manager some advice on how this can be achieved.	
	S18: See comments under S14.	

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Organisation	Forestry	Responses
	S19: See comments under S16.	
	S21: See comments under S14 & S18.	
	S22: Coillte will at time of re-stocking optimise the drainage network to ensure that it complies with the Forest Service Guidelines. Nevertheless, by not draining some sites, most particularly on peat soils, serious damage to the subsequent rotation will occur leading to the loss of the crop, an option that Coillte cannot accept.	
DAFF SE_RBMP_013	All of the River Basin Management Plans should take more account of new statutory provisions covering the use phase of pesticides will be agreed at EU level during 2009, as part of the EU Thematic Strategy for Pesticides. The measures to be included in Irelands National Action Plan will be more comprehensive than those envisaged by the draft RBMPs.	This comment has been noted
	It is regrettable that the focus in relation to forestry is solely on perceived pressures, with the result that the benefits of forest cover and forestry to the improvement or maintenance of water quality are not mentioned, let alone detailed. These draft management plans are the weaker as a result.	The draft plan acknowledges the necessity to focus on issues, however background documents set out the benefits of such activities.
	It is noted that the draft management plan for the Eastern River Basin District does not follow the same template as the others. This plan is not addressed here because the presentation of that Draft RBMP is such that it is extremely difficult to analyse in any meaningful way. It is strongly recommended that all plans adhere to the same template.	This comment has been noted
	The Directive adopts a coordinated approach towards good water quality. However, the draft management plans place little emphasis on a more coordinated approach towards achieving its effectiveness – it seems that each pressure is taken in isolation.	Coordination is taken as an overall theme in the action plan following identification of the individual issues and their measures.
	This latter is compounded by the fact that the management plans and their measures are not subject to an economic analysis that would enable prioritising measures on the basis of their value for money/resources and their effectiveness. The draft plans are less than complete for this reason.	Cost effectiveness analysis is required on a site by site basis.
	A strategy to achieve acceptable water body status will be needed which will involve a suite of measures, across a range of identified pressures, both diffuse and point source. The cost effectiveness of one measure over another measure has not been addressed in the draft management plans. A Cost Effective Analysis of each measure will need to be undertaken for different strategies. This analysis should form part of the final plan.	

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Organisation	Forestry	Responses
	<p>The implementation of the draft measures will require the co-operation of all stakeholders and to that end the Forest Service and forestry sector will require access to all of the relevant databases that were used in the formation of these plans and, in particular, those that will be necessary as part of decision support systems to implement the measures when the plan is adopted. Access to this information in an agreed format is essential to the proper implementation of the proposed measures and should be referenced in the plans. The proposed methodology for such sharing should be detailed.</p> <p>The draft management plans should also place greater emphasis on monitoring, reviewing and reporting the progress of the plans and on updating the national statutory bodies.</p>	<p>This is the role of a high level implementation group</p>
	<p>Some of the measures for forestry in the Draft Management Plans (e.g. in Table 10) are based on the results of limited studies. This should be stated and reference to these studies should be made more clearly in the plan.</p>	<p>A full analysis of all peer reviewed literature was undertaken as part of the Forest and Water POMS and additional research on a national scale undertaken for acidification, eutrophication and sedimentation pressures. The proposed measures were identified by a Working Group comprising of experts from Forest Service, Coillte Teoranta, COFORD, NPWS, EP, Fisheries, Local Authorities, RBD Consultants and International Experts and Academics. The measures identified were supported by the research and literature surveys undertaken by UCD and UCC as part of the measures development and establishment of cause and effect. The Working Group recognised that some of the proposed measures would be required to be trialled out at a catchment scale to determine their effectiveness. Some further research is being undertaken under the HYDROFOR Project which will assess some of the measures at catchment scale.</p>
EPA SE_RBMP_043	<p>RBD specific forest coverage stats should be included in each plan. Recommended)</p>	<p>This comment has been noted</p>
IFA SE_RBMP_032 SE_RBMP_027 SE_RBMP_029 SE_RBMP_030 SE_RBMP_018	<p>IFA request a meeting with all forestry stakeholders to discuss in detail all submissions prior to completing RBMPs to coordinate the implementation of the Water Framework Directive and the Habitats Directive (Freshwater Pearl Mussel) in the forest sector.</p> <p>IFA strongly oppose the measure to limit or avoid afforestation on peat soils</p> <p>IFA recommends that the Forest Service, Code of Best Forest Practice and the Forest and Water Quality, Forest Harvesting and the Environment and Forestry and Aerial Fertilisation Guidelines are sufficient to satisfy the WFD</p>	<p>These comments have been noted</p>

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Organisation	Forestry	Responses
SWAN SE_RBMP_052	Remove obligation under 1947 Forestry Act to replant all felled areas	The 1946 Forestry Act has been under review for some time and this issue is under consideration. The Minister does have the power under the existing Act to waive the requirement for replanting.
	Enforcement of Code of Good Practise as mandatory	This comment has been noted. Elements of the Code are included in the PoM's
TEAGASC SE_RBMP_055	Teagasc is concerned about the large uncertainties surrounding the environmental effectiveness of some of the proposed Supplementary Measures. It is Teagasc's position that Supplementary Measures should only be introduced following catchment-specific evaluations of the cost-effectiveness of proposed measures.	In the background document for Forest and Water it was clearly indicated that some measures will require their effectiveness to be assessed through further research and field trials before full implementation. Measures included in the plans were proposed as a suite of measures the most appropriate of which should be used following site specific assessments.
	The proposed measures to mitigate acidification include avoiding or limiting afforestation on 1st and 2nd order stream catchments in acid-sensitive catchments and a revision of the Acidification Protocol. They also include remediation measures such as restructuring of existing forests and liming to mitigate acid impacts. Teagasc is concerned that the mechanism of acidification is not fully understood and needs further research to validate existing data. Consideration also needs to be given to the practicality and the costs associated with adopting such measures.	The proposed limitation on percentage planting in acid sensitive first and second order stream catchments was established based on recent research undertaken as part of the WFD implementation. Further research is ongoing (Hydrofor Project) to validate the catchment % cover, which could give rise to acidification issues and also to determine the extent downstream of the acid impact. However, acid impacts were shown to occur based on coniferous forest cover above the thresholds indicated.
	Measures to mitigate eutrophication and sedimentation should be aimed at forest operations (including forest establishment, roading, harvesting, and replanting) rather than the extent of forest cover within a catchment. Measures should be targeted at the most vulnerable of the pre-1990 forests as younger sites have been established in accordance with Forest Service standards.	The eutrophication measures and sedimentation measures are in fact aimed at forest operations such as establishment, roading, harvesting and replanting. Research did indicate that the likelihood of impact from these sources increased as forest cover in a catchment increased.
	Nutrient inputs tend to be much lower compared with agriculture and thus riparian forest planting may help to protect water quality within sensitive areas. Teagasc suggests that the most effective approach to changing species mix at the replanting stage, would be to concentrate the planting of broadleaves (that are more nutrient demanding) in the aquatic zone.	Noted, although in some instances establishment of broadleaves in the aquatic zone may prove challenging.
	Proposals to limit drainage should only be made on the basis of relevant research and should take the financial, practical and health and safety consequences into account. Few species will tolerate limited drainage which results in reduced crop productivity, excessive windblow and dangerous and inaccessible forests.	Limitation of drainage refers mainly to a move away from the type of drainage systems utilised pre 1990 after which the guidelines were introduced. Where buffer zones are been established there should be no drainage directly to watercourses and overland flow should be the preferred option.
IRISH WILDLIFE TRUST SE_RBMP_020	It is necessary to address the challenge of getting the right type of forestry in the correct location within the plan.	Establishment of forestry can be very site specific and will be dependent on soil type and conditions, elevation, wind direction etc. Some measures within the plan are targeted at ensuring replanting and afforestation and do not result in monocultures but are of suitable mixed species.

Organisation	Forestry	Responses
Laois County Council SE_RBMP_025	Laois County Council has no involvement in the operation or management of afforested areas. The Council may seek derogations for a number of river bodies as the management of these afforested areas is carried out by other parties.	The DEHLG has established a high level WFD implementation group with representatives from relevant authorities. The implementation of specific measures and responsible authorities will be decided during the implementation process
EASTERN REGIONAL FISHERIES BOARD SE_RBMP_045	The Board request that the issue of sustainability of replanting on upland sites be address and that a precondition of replanting on such sites be that proper management are undertaken to address nutrient losses during and after clearfell operations	These are included in the proposed measures

3.2.6 Usage and Discharge of Dangerous Substances

Organisation	Dangerous Substances	Responses
CENTRAL FISHERIES BOARD SE_RBMP_036	The fact that Phosphorus has been designated a dangerous substance under the WFD has not been highlighted in the plans and the general public must be informed of this.	Phosphorus is named as General Quality Parameter in the WFD monitoring programme and has been included in the monitoring programme. An EQS has been also set for Molybdate Reactive Phosphorus (MRP) under the following regulations S.I. No. 272 of 2009. An awareness campaign is proposed for the general public
SWAN SE_RBMP_052	The treatment of drinking water supplies with chlorine, fluoride and aluminium must be independently reviewed	This matter was reviewed recently by the Department of Health and it was decided that the current policy should be retained subject to some changes, the most significant of which was the reduction in the concentration of fluoride.
	Conduct a public awareness campaign on the use and disposal of a range of household chemicals: oils, detergents, paints, solvents, etc.	The HSA are carrying out awareness raising work under the remit of REACH and an awareness campaign is proposed for the general public.
Animal and Plant Health Association SE_RBMP_005	While a small number of Plant Protection Products are specifically named within the priority substances and relevant pollutants, the dangerous substances should not be applied in a generic all encompassing way.	Noted. Plant Protection Products are regulated with the aim to ensure no harmful human and animal health effects and no unacceptable environmental impact.
	An excellent opportunity to introduce the proposed National action plan on sustainable use of Pesticides	The EU Commission is developing a strategy for sustainable use of pesticides focusing on the use-phase in the life cycle of pesticides and introducing specific measures to protect waters from the impact of pesticides.
	S9. Pesticide Use - Reduce Pesticide use. This gives the impression that farmers and land owners over use pesticides	
	S20. Develop biological control methods. This is an aspiration at present.	

Organisation	Dangerous Substances	Responses
IRISH WILDLIFE TRUST SE_RBMP_020	Chlorine and fluoride should be seriously investigated in Ireland. Its use can potentially mask ecological problems that should be addressed.	This matter was reviewed recently by the Department of Health and it was decided that the current policy should be retained subject to some changes, the most significant of which was the reduction in the concentration of fluoride.
	Heightened levels of oestrogen and other hormones in wastewater and their impacts on fish and other aquatic fauna is not considered or addressed	This has been addressed through EPA study into endocrine disruptors in the Irish Aquatic Environment. Please refer to report below and summary conclusions available on EPA site ENDOCRINE DISRUPTORS IN THE IRISH AQUATIC ENVIRONMENT for any further insight into this matter. There is insufficient information available at present. Technical issues to be addressed before comprehensive measures can be put in place
IRISH WILDLIFE TRUST WATERFORD BRANCH SE_RBMP_024	Report on the impact of antibiotics and hormone-disrupting pharmaceuticals, and put in place measures to protect waterbodies, in particular drinking water, from these substances	
EASTERN REGIONAL FISHERIES BOARD SE_RBMP_045	The Board are anxious that the relevant programmes to detect the listed substances, to control their discharge and to carry out surveys would be put in place as soon as possible	This comment has been noted and forwarded to the EPA and DEHLG for consideration The EPA have put in place a chemical status monitoring programme under the WFD monitoring programme

3.2.7 Physical Modifications

Organisation	Physical Modifications	Responses
THE HERITAGE COUNCIL SE_RBMP_004	Historical modifications to our waterbodies. It may arise that there are conflicts between the needs of aquatic biodiversity and those of the cultural heritage in the "impassable barriers remediation scheme". These should be dealt with on a case by case basis	Additional measures may be needed to restore good status to waters impacted by historical morphological schemes - this will be dealt with on a case by case basis. Restoration measures are being considered as part of the measures and controls required by Article 11(3) of the WFD to ensure that the hydromorphological conditions are consistent with the achievement of the required ecological status.
	Funding should be allocated to addressing historical modifications, as appropriate, and to enhancing channels affected by earlier drainage works.	Channel enhancement priorities may be considered as part of the River Enhancement Programme. This comment has been noted and forwarded to the OPW for consideration.
	The Council requests that measures take account of historic features and urban landscapes in relation to additional flood defence work.	Provision of additional flood defence work is outside the remit of this plan but will be addressed under the implementation of the Floods Directive. Any plans developed under this directive will be subject to SEA which will be required to consider cultural impacts. Also current practice is for flood alleviation projects to fully comply with the Environmental Impact Assessment (EIA) legislation, which includes cultural impacts. Further, the public participation aspects of the Floods Directive must be considered with those of the Water Framework Directive.

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Organisation	Physical Modifications	Responses
	It would be beneficial if the RBMPs clarified if hard coastal protection structures qualify as “physical modification”, as there are likely to be calls for more of this type of structure in the future	These were considered to be physical modifications in the assessments of marine morphology under the WFD.
SWAN SE_RBMP_052	The Land Drainage Act must be revoked to remove the incentive for modifying wetlands and riparian areas through drainage.	Artificial drainage schemes to improve agricultural productivity were traditionally carried out on a catchment basis to allow for the fact that the whole catchment acts as a unit. As required by the Arterial Drainage Acts 1945 to 1995, no flood alleviation or land drainage works are carried out without due regard to the downstream effect of the proposal on hydrology and flow patterns.
	Clarification on the treatment proposed for culverts is requested - Will they be retained or removed to restore streams	Physical Modifications Measure includes for impassable barriers investigation in 635 waterbodies in the SERBD as well as in 4507 waterbodies nationally. Culverts can act as potential barriers to fish migration and are therefore incorporated into the impassable barriers investigation, which will be carried out on a case by case basis.
PORT OF WATERFORD COMPANY SE_RBMP_051	It was noted that it is considered necessary to introduce a new control system for physical modifications, and believe that combining existing licensing regimes into one comprehensive registration and authorisation system would be beneficial overall. We expect that this will reduce application and response times for licences in the future, and provide guidance with procedures	This comment has been noted and forwarded to the EPA and DEHLG for consideration
EASTERN REGIONAL FISHERIES BOARD SE_RBMP_045	Since existing basic measures i.e. legislation, do not provide for prior authorisation, registration, or general binding rules, these controls require introduction in Ireland	This comment has been noted and forwarded to the DEHLG for consideration
	When considering physical modification of surface waters, all elements of this natural environment must be protected and fish passage conditions must be maintained at all times	The Planning and Development Regulations 2006 require that planning authorities notify and take advice from Regional Fisheries Boards of developments that would involve the carrying out of works in, over, along or adjacent to water bodies and wetlands, and to ensure that existing rights of way and access are maintained.
	Given the widespread distribution of Annex II species (Habitats Directive) such as Salmon & Lamprey, it is essential that an impassable barriers investigation be undertaken on all such watercourses	Physical Modifications Measures include for impassable barriers investigation in 635 waterbodies in the SERBD as well as in 4507 waterbodies nationally.
SOUTHERN REGIONAL FISHERIES BOARD SE_RBMP_044	It is recommended that the lead authority be broadened to include the OPW and the Fisheries Boards jointly in relation to developing new morphology regulations creating a registration and authorisation system	These comments have been noted and forwarded to the EPA and DEHLG for consideration
	We very much support the proposal of a Code of Practice for physical modifications, and recommend that the lead authority comprise of the OPW and the Fisheries Boards jointly	

3.2.8 Abstractions

Organisation	Abstractions	Responses
AN TAISCE SE_RBMP_041	Water saving strategies have not been addressed in the Draft Plan. A recent report published notes that despite every prospect of water shortages by 2013. The Directive requires measures to promote efficient and sustainable water use	An Education and Public Awareness campaign, raising general awareness and providing information about specific water issues and their solutions are included. In addition water saving measures are included under the measures for abstractions.
	A transboundary water conservation programme needs to be developed and implanted by each Plan, to help raise awareness and provide information to the public.	This comment has been noted and will be forwarded to the DEHLG
DCENR SE_RBMP_042	Noted that new prior authorisation of abstraction and impoundment activities will be introduced and will take form of abstraction licensing system. DCENR are of the understanding that DEHLG will develop this but lag behind in licensing groundwater abstractions. To equally protect fisheries interests in the context of surface water abstractions all licensing systems/prior authorisation systems must be developed in parallel with each other thus keeping Ireland in compliance with Article 11.3(e) of the WFD.	This comment has been noted and forwarded to the DEHLG for consideration under RIA process.
EPA SE_RBMP_043	Develop and Integrate a Drinking Water Safety Plan approach to identification of potential polluting hazards, risks and mitigation measures for critical source risks identified.	Preparation of the Water Safety plans are a basic requirement of the Water Regulations and are as such a basic measure. This is already acknowledged in the plan.
THE HERITAGE COUNCIL SE_RBMP_004	Hopes that RBDPs are sufficiently robust to cope with potential changes in our precipitation patterns and increased demand for human drinking water and potential impact to aquatic ecosystem as a result.	Measures have been assessed for climate change adaptation using European Union recommendations. A Strategic Environmental Assessment has being undertaken to assess the wider environmental impacts of this plan including climate change issues.
IFA SE_RBMP_032 SE_RBMP_027 SE_RBMP_029 SE_RBMP_030 SE_RBMP_018	Propose farm families who use public water supplies should have equivalency with other public water users and current restriction must be abolished.	This comment has been noted and passed to the relevant authority for consideration

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Organisation	Abstractions	Responses
IFF SE_RBMP_026	Urges elected member to reject proposed attempts by EU and DEHLG to scale back in groundwater abstraction when the plan is placed in front of them for decision.	The WFD requires a registration and authorisation system to control impacts of abstractions. Measures and controls to ensure that abstractions conditions are consistent with the achievement of the required ecological status have to be established in response to Article 11(3) of the WFD.
SWAN SE_RBMP_052	A central authority must be established, independent of the local authorities to oversee abstraction licensing, take responsibility for ensuring cumulative impacts of abstraction are not damaging to good water status, and to enforce controls on abstraction. A definition of "significant" abstractions must be provided and justified. Recharge data must be ascertained and available for each abstraction proposed.	The DEHLG will propose new regulations creating a single registration and authorisation system. Authorisations would apply to surface waters and groundwaters, and may be risk-based including registration of all abstractions above a specified abstraction threshold. Previous work on the Initial Characterisation of risk from abstraction impacts prepared in response to Article 5 of the Water Framework Directive used the concept of 'net abstractions' in a water body, accounting for cumulative impacts. The application process will identify any monitoring or assessment requirements.
Shay Murtagh SE_RBMP_015	Rainwater harvesting should be promoted.	This is included as measures for abstractions
EASTERN REGIONAL FISHERIES BOARD SE_RBMP_045	The Board have concerns regarding numerous unregulated abstractions from watercourses throughout the south-eastern region The ERFB have serious concerns relating to abstractions from both ground and surface waters and how climate change may exacerbate the impacts associated with abstractions The Board have concerns that where an abstraction from groundwater is in the immediate vicinity of any watercourse there is a potential to impact upon flows in that watercourse. It is essential that where such abstractions are planned or practiced the impact upon flows in ground and surface waters must be comprehensively assessed in accordance with legislative requirements The Board that the cumulative effects of all potential impacts are taken into account when assessing the impacts of abstractions from watercourses/groundwater and discharges to watercourses/groundwater Abstractions from the Slaney at Rathvilly, the Derry at Tinahely and the River Bann at pallis all represent significant net losses of water to those systems. Given the predictions of lower flows the Board have concerns that abstraction rates at other sites may also need to be curtailed significantly in the near future	The WFD requires a registration and authorisation system to control impacts of abstractions. Measures and controls to ensure that abstractions conditions are consistent with the achievement of the required ecological status have to be established in response to Article 11(3) of the WFD The DEHLG will propose new regulations creating a single registration and authorisation system. Authorisations would apply to surface waters and groundwaters, and may be risk-based including registration of all abstractions above a specified abstraction threshold. Previous work on the Initial Characterisation of risk from abstraction impacts prepared in response to Article 5 of the Water Framework Directive used the concept of 'net abstractions' in a water body, accounting for cumulative impacts. The application process will identify any monitoring or assessment requirements.

Organisation	Abstractions	Responses
	We note the similarity climatically between Ireland and Scotland and believe that a similar precautionary approach incorporating a hands-off flow for abstractions should be adopted in Ireland to protect salmonid and lamprey recruitment	This comment has been noted and will be forwarded to the DEHLG for consideration

3.2.9 Climate Change

Organisation	Climate Change	Responses
AN TAISCE SE_RBMP_041	The flood risks associated with resulting rises in sea levels are being dealt with in the Flood Management Plan currently being drawn up. This issue is noted, but not adequately addressed in the Draft Plan. Closer integration of the two Plans, using approaches that deliver objectives under both, is necessary.	An update on climate change has been included in the plan
	Climate change dealt with in a reactive manner instead of proposing proactive strategies to increase resilience of ecosystems, for example wetlands, and societies. There is a failure to identify and promote the functions of wetlands, for example in controlling pollution and flooding.	Wetlands are included as a measure under the morphology issue.
CENTRAL FISHERIES BOARD SE_RBMP_036	Rational management and wise use of resources needs to be implemented. The plan should be proofed against climate change with more emphasis given to impacts and adaptation.	An update on climate change has been included in the plan
	It is proposed that an SEA be undertaken to assess the wider environmental impacts of the European Union recommendations including climate change issues. There should be specific fisheries related assessments.	An SEA has been ongoing in parallel with the draft and final plans
EPA SE_RBMP_043	Provide specific measure on how RBD will incorporate adaptation measures against climate change.	An update on climate change has been included in the plan
FAILTE IRELAND SE_RBMP_047	Consideration within the plan to the issue of climate change	An update on climate change has been included in the plan
THE HERITAGE COUNCIL SE_RBMP_004	Recently completed a review of the potential impacts of climate change on the heritage and tourism of Ireland's inland waterways and coasts. This may be of assistance in the climate proofing of the plan. It is available from www.heritagecouncil.ie	These comments have been noted. The recommendations will be considered when developing the various information and awareness campaigns recommended as part of the suite of mitigation measures which are also included in the SEA environmental report.

Organisation	Climate Change	Responses
	Urge that action be taken to educate the general public about the value of water generally, and that specific audiences are targeted on specific issues such as the location of septic tanks, the sinking of wells, discharges into water, the importance of wetland sites for water Hopes that sufficient human and financial resources are allocated to additional measures to ensure active involvement of the public in the plan implementation in the long term.	
SWAN SE_RBMP_052	The plan should give a more detailed treatment of climate change similar to that in the NI draft Plans, including an outline of the implications of climate change for the aquatic environment and a summary of measures for each SWMI, to address these implications.	An update on climate change has been included in the plan
IRISH WILDLIFE TRUST SE_RBMP_020	Climate change and sea level rise need to be addressed by the plans. Reduction in rainfall and higher temperatures leading to eutrophication also need to be considered. Local Authority Development Plans must include actions or proposals for climate change.	These comments have been noted. An update on climate change has been included in the plan
IRISH WILDLIFE TRUST WATERFORD BRANCH SE_RBMP_024	There is a requirement that "actions and measures" in the RBMP will need to be refined to meet the significant temporal and spatial changes in precipitation receipts and other climate-related impacts in Ireland	An update on climate change has been included in the plan

3.2.10 Aquaculture

Organisation	Aquaculture	Responses
AN TAISCE SE_RBMP_041	Aquaculture still not adequately addressed within the Draft Plan. The significant water quality and ecological pressures that can arise from aquaculture operations are still not recognised or adequately addressed in the Draft Plan.	Aquaculture was given due consideration in the production of the River Basin Management Plan as a significant water management issue following comments received during SWMI consultations. Also a Strategic Environmental Assessment has been undertaken to assess the wider environmental impacts of this plan including aquaculture issues. The plan states the licensing controls in place and contains links to the Shellfish Waters pollution reduction programmes.
DAFF SE_RBMP_013	It should be pointed out that the shellfish waters pollution reduction plans are not aimed at reducing pollution from shellfish aquaculture but are in fact plans aimed at reducing pollution levels	This clarification has been noted.

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Organisation	Aquaculture	Responses
	<p>All finfish farm applications are required to submit an environmental Impact statement as part of their application. All licences contain relevant terms and conditions for monitoring the benthic impact of finfish farms and of water quality and sea-lice control is managed through a monthly regime of sampling and treatment where appropriate. DAFF is currently in discussion with NPWS and the EU Commission to develop processes to ensure that aquaculture licensing conforms to the requirements for conservation and protection of Natura 2000 sites.</p>	<p>This comment has been noted</p>
	<p>Should be noted that initiatives are being discussed at EU level in relation to halting the loss of biodiversity and addressing the threats from invasive alien species. These discussions are likely to lead to a revised EU commitment on halting the loss of biodiversity and the preparation by the European Commission of a Thematic Strategy on Invasive Alien Species.</p>	<p>This comment has been noted</p>
<p>IFA SE_RBMP_032 SE_RBMP_027 SE_RBMP_029 SE_RBMP_030 SE_RBMP_018</p>	<p>Ireland must set clear targets for water quality in bays and Shellfish designated areas to ensure no bay falls below criteria for water quality as explained in Code of practice for Microbiological Monitoring of Bivalve Mollusc Production areas.</p>	<p>The EU Shellfish Waters Directive 'as transposed by S.I. 268 of 2006 and as amended by S.I. 55 of 2009' contains these targets. Pollution reduction plans for each of the 63 designated shellfish waters in Ireland are currently in available at Click Here.</p>
<p>SWAN SE_RBMP_052</p>	<p>The impact of aquaculture installations on surrounding habitats is not addressed in the draft Plan.</p>	<p>Aquaculture was given due consideration in the production of the River Basin Management Plan as a significant water management issue following comments received during SWMI consultations. Also a Strategic Environmental Assessment has been undertaken to assess the wider environmental impacts of this plan including aquaculture issues.</p>
	<p>Aquaculture is a Significant Water Management Issue and must be dealt with robustly in the Action Plan, with specific measures, for marine based aquaculture - as part of an Integrated Coastal Zone Management Approach and for land based aquaculture - as part of Fisheries, Planning & Development Regulations, Wastewater & Industrial Licences.</p>	<p>Aquaculture activities are licensed or will fall under future licensing controls. The Department of Agriculture, Fisheries and Food intends to implement regulations to control the discharge of certain substances used in the operation of finfish farms located in marine waters. The regulations will establish water quality standards for receiving waters for specific substances; impose discharge limits for certain substances as a condition of an aquaculture licence; establish a programme of measures relevant to aquaculture to protect water quality. These regulatory controls together with the recently introduced surface water quality regulations provide for management of aquacultural activities.</p>
<p>IRISH WILDLIFE TRUST SE_RBMP_020</p>	<p>Local pressures or adequate measures to address aquaculture are not recognised or adequately addressed in the draft Plans</p>	<p>Measures for aquacultural activities entail licensing as described above</p>

Organisation	Aquaculture	Responses
IRISH WILDLIFE TRUST WATERFORD BRANCH SE_RBMP_024	There is a need to take account of the negative impacts of large-scale shellfish harvesting methods	Aquaculture was given due consideration in the production of the River Basin Management Plan as a significant water management issue following comments received during SWMI consultations. A Strategic Environmental Assessment has been undertaken to assess the wider environmental impacts of this plan including aquaculture issues. The plan states the licensing controls in place and contains links to the Shellfish Waters pollution reduction programmes.

3.2.11 Invasive Alien Species

Organisation	Invasive Alien Species	Responses
AN TAISCE SE_RBMP_041	The issue of invasive species has not been adequately addressed; this is an area of increasing concern. The Draft Plan has not developed an adequate scheme to tackle the issue, nor has it highlighted the magnitude of the threat that invasive species pose.	Invasive alien species are addressed under locally focused and future issues. Possible measures generally necessitate focused management and enforcement actions that will be coordinated at District level. They include supporting measures being developed by the national alien species study and local investigations at District level.
CENTRAL FISHERIES BOARD SE_RBMP_036	Imperative that authorities implement extra measures to stop the importation and further spread of non-native/exotic species in Ireland, particularly in the northwest and west where many waterbodies are in reference state in terms of fish species and free from non-native introductions.	The DEHLG are considering under the Wildlife Act 1976 section 52(7) the introduction of regulations to prohibit the possession or introduction of any non-native species that may be detrimental to native species.
EPA SE_RBMP_043	Invasive alien species of particular concern in each RBD and should be identified specifically (Recommended)	The NPWS are involved in developing supporting measures through the national alien species study and local investigations at District level. Once available the list should be incorporated into the Plan upon review in 2011.
THE HERITAGE COUNCIL SE_RBMP_004	Hopes that the emphasis of the RBD will result in sufficient funding to be made available to restrict the spread of invasive species in our water bodies.	The significant potential impacts from the spread of invasive species, has been recognised at the National and European level. As such both National and European funding is being made available to address the issue through research and the development of action plans to both control and eradicate invasive species in Ireland.

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Organisation	Invasive Alien Species	Responses
SWAN SE_RBMP_052	Lists of known invasive alien species must be included in Plans.	The National Parks and Wildlife Service are involved in developing supporting measures through the national alien species study and local investigations at District level. Once available the list should be incorporated into the Plan upon review in 2011.
	RBD Management Plans must make clear which agency/ies has responsibility for tackling invasive alien species, the resources available to do this, and their ability to command compliance from others in delivering this task.	The National Parks and Wildlife Service and the Northern Ireland Environment Agency jointly commissioned the 'Invasive Species in Ireland Project ' in 2006. There are number of other stakeholders and State agencies such as the Central Fisheries Board and Regional Fisheries Boards involved. The purpose of this study is to develop alien species actions plans for their control and eradication. As study is currently on-going and not yet complete, the requested information can not be included at this time.
	RBD Management Plans must make clear who is responsible for handling situations where alien species were licensed for introduction to water bodies, but which have subsequently become invasive.	This comment has been noted. However this issue would be better addressed by the NPWS during preparation of the national invasive species study.
	The sale of all known invasive alien species, especially priority species already known to be causing serious problems should be banned immediately with emergency legislation	The DEHLG are considering under the Wildlife Act 1976 section 52(7) the introduction of regulations to prohibit the possession or introduction of any non-native species that may be detrimental to native species.
IRISH WILDLIFE TRUST SE_RBMP_020	Clear guidance on who is responsible for what tasks, and how agencies and actors work together, as well as adequate resources are necessary if the Draft Plan is to be genuine in attempting to deal with such issues. Waiting for results of studies will simply let the problem worsen and ultimately cost more.	This comment has been noted and will be considered in the development of measures and controls in relation to the control and eradication of invasive alien species
EASTERN REGIONAL FISHERIES BOARD SE_RBMP_045	Best practice management plans should be implemented in full at the river basin district level	This comment has been noted and will be considered in the development of measures and controls in relation to the control and eradication of invasive alien species

3.2.12 Protecting High Quality Areas

Organisation	Protected High Quality Areas (FWPM)	Responses
BIRDWATCH IRELAND	Concerned of the lack of consideration of national and local priority species,	The location and protection of these sites will be integrated into Local

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Organisation	Protected High Quality Areas (FWPM)	Responses
SE_RBMP_035	habitats and sites including previously proposed NHAs, wetlands beyond the boundaries of designated sites etc.	Authority Plans and Programmes. Since all sites have not yet been identified and mapped by NPWS a recommendation is being made that NPWS develop an online database of these sites, regularly update it and provide such updates to Public Authorities and other statutory bodies. The implementation of Local Biodiversity Action Plans would give particular cognisance to the importance of conserving wetland areas at the local level and through development control and control of illegal dumping on such sites.
CENTRAL FISHERIES BOARD SE_RBMP_036	<p>The adoption of program of measures that are focused on a single species and that fail to take into account the complexity and interaction with other species are more likely to fail. In this respect, pearl mussel management plans in the absence of salmon management plans fall into this category.</p> <p>Until scientific research indicates otherwise, equal weighting, in terms of sensitivity should be afforded to early life stages of salmonids and early life stages of the pearl mussel.</p>	These comments have been noted and forwarded to the NPWS
EPA SE_RBMP_043	Reference to RBD specific FWPM plans must be used. (Strongly Recommended)	Specific reference to the FPM is used though out the plan under the Birds and Habitats Directives.
THE HERITAGE COUNCIL SE_RBMP_004	Hopes that local authorities will endeavour to increase their ecological expertise and capacity in order to deliver such a commitment, to ensure their compliance with the Birds and Habitats Directives, and to ensure water quality standards are reached. Contributing resources to the implementation of Local Biodiversity Action Plans (where developed) should also help to deliver on this commitment, as would giving particular cognisance to the importance of conserving wetland areas at the local level and through development control and control of illegal dumping on such sites, to maintain their contribution to water quality management.	In recent years many local authorities have broadened the range of professional staff employed by them, in particular in the environmental and natural heritage area, such as ecologists, biologists, agricultural scientists, heritage and biodiversity officers. However, this is not the case in all local authorities.
IFA SE_RBMP_032 SE_RBMP_027 SE_RBMP_029 SE_RBMP_030 SE_RBMP_018	IFA proposes that additional measures must not be imposed on the farming community until the reasons for FPM failing to reproduce are identified. IFA proposes that detailed research is conducted to evaluate the social, economic and environmental cost of implementing the land sterilisation measures proposed, in advance of their implementation.	This comment has been forwarded to NPWS for consideration during FPM Sub basin plan preparation

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Organisation	Protected High Quality Areas (FWPM)	Responses
IRISH WILDLIFE TRUST SE_RBMP_020	Positive Role of FPM is not recognized or highlighted. Clear felling continues in FPM catchments despite moratorium issued by DOE. Lack of enforcement by competent authorities is questioned in future in order to achieve WFD objectives.	This comment has been forwarded to NPWS for consideration during FPM Sub basin plan preparation
Laois County Council SE_RBMP_025	Laois Co Co is concerned about the additional measures that may be imposed on it by the provisions of the Draft Freshwater Pearl Mussel - Nore Sub-Basin Management Plan	This comment has been forwarded to NPWS for consideration during FPM Sub basin plan preparation
Cllr Declan MacPartlin SE_RBMP_050	It is imperative if there is to be respect for the regulations deemed necessary to secure the objectives of the WFD that factors such as the 'pearl mussel' are not given excessive status or that contrived precautionary principle arguments are given a weighting they do not deserve.	Factors such as the 'pearl mussel' are prescribed the status afforded to them under the Habitats Directive. The precautionary principle is utilised in instances when it can not be conclusively ascertained that there will be no significant impacts
IRISH WILDLIFE TRUST WATERFORD BRANCH SE_RBMP_024	Birds and Habitats Directives - emphasis should be on restoring or maintaining the pristine nature of designated sites and keeping them free from development Issue enforcement orders where operations are having a damaging effect on protected species	These form part of the Basic Measures

3.2.13 Cruising, Boating & Recreation

Organisation	Cruising, Boating and Recreation.....	Responses
DCENR SE_RBMP_042	An equivalent supplementary measure to 'enforcing pump out controls and speed restriction at district level' may need to apply to coastal/Ports/Bay water bodies and lead authorities should be a combination of Local Authorities/Port Authority/Dept of Transport	This comment has been noted
FAILTE IRELAND SE_RBMP_047	Prioritisation of water quality improvements to waters of high recreational and amenity value	Such designated waters are included in the register of protected areas and objectives assigned accordingly.
SWAN SE_RBMP_052	The role of boat users in the transference of alien species must be addressed.	The NPWS and the Environment and Heritage Service in Northern Ireland jointly commissioned the 'Invasive Species in Ireland Project' in 2006. Management and contingency plans have been produced for the most high risk species. Awareness raising campaigns to all users of water bodies forms a major component of these management and contingency plans which are required to prevent the spread of non-native invasives. Suggestion forwarded to the NPWS who are involved in developing

Organisation	Cruising, Boating and Recreation.....	Responses
		supporting measures through the national alien species study.

3.2.14 Shared Water Issues

Organisation	Shared Water Issues	Responses
AN TAISCE SE_RBMP_041	Experience of the existing operation of Local Authorities and other government agencies does not provide evidence that joined-up thinking (and action) is deliverable within these organisations.	This has been addressed as an issue; the DEHLG has established a high level WFD implementation group with representatives from relevant authorities.
Animal and Plant Health Association SE_RBMP_005	Where Ireland has cross border river basin catchments areas, it would be appropriate to have the same substances listed and the same threshold values agreed to avoid differing scenarios in different catchments across the same island.	The WFD promotes common approaches, standards and measures for water management. Further harmonisation of measures will be achieved through implementation of the river basin management plans and the ongoing coordination via the North South Technical Advisory Group.
IRISH WILDLIFE TRUST SE_RBMP_020	Unacceptable that a single plan has not been produced for the IRBDs instead of the working together document.	The Working Together document sets out the high degree of coordination achieved in all aspects of plan preparation; it, together with the detailed plan summaries for the Northern Ireland and Ireland portions of the district, constitutes a single plan. The detailed summaries allow for the current differences in legislative controls and adoption process requirements. Further harmonisation of measures will be achieved through implementation of the river basin management plans and the ongoing coordination via the North South Technical Advisory Group.
Laois County Council SE_RBMP_025	This Council is concerned that the actions or inactions of other local authorities may lead to a failure of the effected River Body from meeting the objectives of the plan by 2015	This has been addressed as an issue, the DEHLG has established a high level WFD implementation group with representatives from relevant authorities.

3.2.15 Public Participation

Organisation	Public Participation	Responses
CENTRAL FISHERIES BOARD SE_RBMP_036	There is a need for all public authorities within each RBD to fully engage with the public and to increase public awareness of the directive, the river basin management plan and the program of measures. Emphasis must be on the promotion of sustainable uses of our waters. There is a need to review the existing consultation framework as the river basin plans go from adoption to implementation phase.	An awareness programme is included as a measure.

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Organisation	Public Participation	Responses
SWAN SE_RBMP_052	A programme for actively encouraging public participation in the implementation of the first planning cycle of the Plan from 2009 to 2015 must be set out in the Plan	An awareness programme is included as a measure.
	Include as a measure to be implemented immediately, a national public awareness campaign on water.	
	The RBD must provide access to information on the Plan (and its supporting/background documentation) to those without broadband Internet connections	Access to Information on foot of requests will be facilitated through the River Basin District office or relevant Local Authorities; however broadband access is also available via libraries.
	The Advisory Councils must be reconstituted in an open and transparent manner.	This comment has been noted
	Set up scheme for local initiatives engaging all relevant stakeholders in water body protection.	This comment has been noted. The appropriate level and means of engagement will be considered in the implementation process
	Engage in ongoing dialogue with SWAN regarding our submission and provide us with a further revised copy of the draft Plan indicating where our concerns have been taken on board	This comment has been noted
Animal and Plant Health Association SE_RBMP_005	As farmers are by far the majority users of Plant Protection Products we would be of the opinion that in order to communicate with the widest user audience then we would recommend that all future publications should aid the final user in their awareness campaign and not make particular issues difficult to find by including them in areas that the stakeholder is unlikely to read.	An awareness programme is included as a measure.
IRISH WILDLIFE TRUST SE_RBMP_020	Education is important to provide all citizens with a greater focus on preventing problems and actively protecting waters. A wider engagement with the public is needed through schools and other community groups and marketing. Training in Local Authorities also needs to take place.	An awareness programme is included as a measure.
	A Scheme to identify water bodies meeting 'good' or 'high' status should be established.	The WFD monitoring programme includes for such investigative programmes.
	All stakeholders should have access to comprehensive geographical information on locations of threats, pressures and monitoring results.	Access to spatial information relevant to the WFD and plans is facilitated through the WaterMaps web based tool available at www.wfdireland.ie . Further development and improvement of this tool is ongoing during finalisation of plans. Information requests will also be facilitated through the River Basin District office and relevant Local Authorities, however access is available via libraries
	No sufficient solution to lack of broadband internet access for the public for Water maps tool.	
PORT OF WATERFORD COMPANY	As further issues arise which are likely to require input from different stakeholders, it may be useful if a liaison panel was formed	This comment has been noted and forwarded to the EPA for consideration

Organisation	Public Participation	Responses
SE_RBMP_051		
Kildare County Council SE_RBMP_039	Where the information is not set out clearly, it does not facilitate full stakeholder participation.	This comment has been noted and forwarded to the EPA for consideration
IRISH WILDLIFE TRUST WATERFORD BRANCH SE_RBMP_024	The RBMP must include recommendations, advice, education to households on the potential impacts from household cleaning products on water quality	An awareness programme is included as a measure.

3.2.16 Economics

Organisation	Economics	Responses
AN TAISCE SE_RBMP_041	Information regarding proposed budgets is deficient.	Costing of wastewater and on-site system measures has been undertaken for all water management units. The plan clarifies the recent proposals on water pricing policy and also confirms that economic analysis has not been used to extend deadlines for the final plan. The resourcing of plan implementation is being considered by the relevant authorities who will produce implementation programmes.
	The Draft Plan appears to have been drafted in the absence of any economic analysis. Any economic information has only been made available in the background documents. The Plan must include informative and comprehensive economic analysis.	
	The Draft Plan needs to carry out an ecological cost benefit analysis as required by Article 5 of the WFD and include it within the Plan, not the background documents.	
	Even within the background information there is a lack of clear justification with regard to economic analysis, for example many measures are not properly quantified, nor are the HMWB designations properly detailed.	
	Water pricing is mentioned in the Draft Plan as 'Member States needing to adopt a cost recovery system to ensure that water pricing policies act as incentives towards efficient water usage'. There is no further description as to what the water pricing policies would entail	
	The Draft Plan has not addressed the issue as to where the resources, such as funding and personnel, will come from to ensure the Plan is delivered and implemented.	
EPA SE_RBMP_043	Clarification of Disproportionate cost test and status of various economic tests on supplementary measures. (Strongly Recommended)	Costing of wastewater and on-site system measures has been undertaken for all water management units. The plan that economic analysis has not been used to extend deadlines for the final plan.

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Organisation	Economics	Responses
IFF SE_RBMP_026	Request for local elected representatives to give particular attention to the scale of costs for the provision of water services to farms and small rural businesses.	This comment has been noted
SWAN SE_RBMP_052	The RBD Management Plans must provide a summary of the economic analysis that has informed the Plans. This is mandatory under Article 13 of the Directive	Costing of wastewater and on-site system measures has been undertaken for all water management units.
	The Plan must specifically require transparent decision-making, with regard to DCA, lead by fully qualified personnel and in consultation with the public and must include a specific directive that alternative objectives cannot be applied based on affordability criteria alone.	
	The Plans must clearly outline the legal situation regarding domestic water charges and propose water charging as the best mechanism for promoting sustainable water use. It should propose an independent review of the issue and the possible charging options, taking into account social justice issues, with full public participation, water charging	This has been included as a measure
IBEC SE_RBMP_048	The River Basin Management framework must bring the transparency and accountability required by the non-domestic sector. Businesses need reassurances that they are only paying the amounts required by law and that charges to the non-domestic sector are not countervailing shortfalls in local authority revenue or cross subsidising the cost of water provision to the domestic sector.	These comments have been noted and will be forwarded to the DEHLG for consideration
	The government decision to abstain from universal water charging has led to some controversy and is perceived as compromising water conservation measures. IBEC wants local authorities and the government to revisit this issue.	
	The economic cost of measures is a significant concern for business and it is regrettable at this stage that transparent cost options are not available.	Costing of wastewater and on-site system measures has been undertaken for all water management units.
	IBEC considers it vital that thorough and transparent cost effectiveness studies are completed with real options to choose between to ensure value for money when the final measures are agreed upon.	
	Due consideration must be given to the balance between the objectives of economic and environmental sustainability	
IRISH WILDLIFE TRUST SE_RBMP_020	The absence of adequate economic analysis in the plan means it is impossible to cost and prioritise necessary actions in the Plan. Cost effective analysis for supplementary measures is recommended.	Costing of wastewater and on-site system measures has been undertaken for all water management units.
	Financial implications of the following need to be considered as cut backs are imminent due to current economic climate: Monitoring, Infrastructure,	

Organisation	Economics	Responses
	Enforcement, Presently provided basic measures.	
Kilkenny County Council SE_RBMP_007	Kilkenny County Council requests that the Plan provides for the necessary economic guidance so that local authorities may fulfil their obligations under the Plan	This comment has been noted and will be forwarded to the DEHLG for consideration

3.2.17 Implementation

Organisation	Implementation	Responses
AN TAISCE SE_RBMP_041	Water body classification is inadequate. The objectives set for each water body and the measures proposed to reach this are all based on the current status of the water body.	These comments have been noted and forwarded to the EPA. Investigative measures to confirm status and pressures are recommended in the plan. Pilot studies on chemical pollution undertook analysis of sediment and biota to detect substances that may not have been present in the water column. There was a consultation on the monitoring programme (which forms a background document to the plan) in 2006. The monitoring programme explains all the surveys for status elements including those targeted to detect dangerous substance discharges. The updated Watermaps tool will contain more explanation of status. The final assessment of status will be determined by the EPA by 2011 in accordance with the Environmental Objectives Surface Water Regulations.
	A large portion of the waters within the Draft Plan have not had each of the different statuses established yet. 26.6% of coastal waters and 23.5% of estuaries still need their surface ecological status to be determined; while 97.5% of rivers and canals, 98.6% of lakes and reservoirs and 100% of estuaries and coastal waters all need to have their chemical status determined.	
	Within the Plan an account of which parameters are measured should be given. This allows for an understanding on how each ecological and chemical status of a specific water body is labelled.	
	There is a wider need to highlight the link between good ecological status and morphological status, to illustrate the need to consider issues in a broader sense of ecosystems and habitats.	
	Due to the nature of how the Draft Plan has been drawn up, it is difficult to ascertain whether the cumulative effects on water bodies have been adequately addressed.	
	No analysis has been carried out on the substrate of riverbeds, mudflats and coastal zone substrate. This is an important area to analysis, as were intermittent pollution may be missed in regular monitoring, accumulation within the sediment would be indicative of such events.	
	The locations of waste water outflows should be made publicly available and accessible for those whom may be of relevance and interest to. Monitoring point information is also needed to assess the validity of these, and the implications of this for interpretation of data generated, relevant for example to waste water treatment discharges.	
	There was no consultation as to the location of the monitoring sites, yet these should be justified	
	Sampling methodology needs to be transparent so that its validity can be assessed.	

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Organisation	Implementation	Responses
	A monitoring scheme should be set-up to ensure that implemented measures do not create adverse impacts that go undetected.	
	There is a vast amount of data not given, which needs to be presented and interrogated, in order to allow concerned parties to assess the quality of the Draft Plan.	
	Much of the modelling that is represented to the reader in the Plan requires an acceptance that all the data used is valid and correct, without any real ability to interrogate it.	
	The secondary effects of failure to implement measures are not addressed within the Draft Plan.	
	No explanation of the data is available on the watermaps website, or anything regarding assumptions of assimilative capacity of coastal waters, which remain unclassified but are unlikely to be maintained or restored to good status if relied upon to absorb polluted water.	
BIRDWATCH IRELAND SE_RBMP_035	Concerned of the lack of data to inform the biological value and condition of water bodies and associated habitats (wetlands in particular) and species, and the lack of mapping of such habitats outside the boundaries of designated sites.	This comment has been noted and forwarded to the EPA and NPWS for consideration
	Concerned about the lack of defined appropriate timescales and targets for actions	Objectives have been established in the plan for all waters. Implementation programmes are to be developed by the relevant authorities
	Concerned for the lack of actions to buffer water bodies and wetlands in planning decision-making processes	The planning process is addressed under the links to plans and programmes section
CENTRAL FISHERIES BOARD SE_RBMP_036	Necessary to continue to undertake the necessary surveys in order to assign a typology classification to all lakes within the RBD.	This comment has been noted and forwarded to the EPA for consideration
DAFF SE_RBMP_013	It should be noted also that the control carried out by DAFF in relation to Statutory Management Requirement 3 (protection of the environment and soil when sewage sludge is used in agriculture) is limited to Cross-compliance checks under the Single Payment Scheme. The implementing authorities for the purposes of the national legislation on use of sewage sludge are the local authorities.	This comment has been noted
EPA SE_RBMP_043	Biology Classification Systems. Should state that classification tools have not yet been developed for a number of biological elements and that once available they will be integrated into the biological classification system.	This has been included in the plan
	Overview Diagram indicating elements contributing to Ecological and	This has been included in the plan

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Organisation	Implementation	Responses
	Chemical Status.	
SWAN SE_RBMP_052	For all waterbodies in the RBD classified as less than good (or otherwise failing objectives) the quality elements that: a) were measured (as listed in Annex V of the WFD) b) were not measured and the reason why and c) were responsible for the failure, must be shown in table form	Classification information has been included in the plans supporting documentation
	The EPA must make data on all sampling sites and frequencies, available in GIS form and be open to dialogue on queries regarding the monitoring sites. The EPA must investigate and establish the most appropriate system of trained volunteer testing for water bodies where monitoring is not presently conducted. The EPA must seek to access other existing robust data sources on water bodies where they hold no data at present, and that are not included in the present monitoring programme	This comment has been noted and will be forwarded to the EPA for consideration
	The RBD Management Plans (and www.wfdireland.ie website) must provide accurate mapped data on known discharges to water, including all licensed discharges and other known pollution sources and related information.	Additional information and explanatory text has been included in the updated Watermaps tool
	Detailed legends explaining all terms, the presence or absence of all categories (or risk, measure, etc.), the meaning of classifications (“good” and “poor”, etc.) must be included in the http://watermaps.wfdireland.ie website.	
	The plans must explain how the performance of authorities responsible for these other Directives will be held accountable, and how improved performance will be secured.	Compliance assessments are carried out by the EPA and other agencies
TEAGASC SE_RBMP_055	Concern regarding approach and methodology used to define standards for nutrient concentrations in receiving waterbodies and about the calibration of these standards against ecological water quality classes (Q-values).	These comments have been noted and will be forwarded to the EPA for consideration
	Concern that by continuing with the current, national river monitoring programmes for nutrient status in rivers and using these as standards for Programmes of Measures (PoMs), this will not be sufficient for ensuring that the consequences of agricultural mitigation of diffuse nutrient transfer has been captured.	
	Proposed low molybdate-reactive P (MRP) standard of 30 µg L ⁻¹ for rivers in Ireland conflicts with the standards set in Scotland, a country with similar hydrology and hydrogeology to Ireland. In Scotland, the proposed standards for riverine Soluble Reactive P (SRP) for good status is set at 50 µg L ⁻¹ for lowland rivers, 40 µg L ⁻¹ for highland rivers and 120 µg L ⁻¹ for rivers with high alkalinity (>50 mg L ⁻¹ CaCO ₃)	

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	Concerned at reviews of PoMs based on current ecological assessments and chemical monitoring that indicate a low ecological status or poor recovery in agricultural catchments without regard for the links between ambient (not episodic) riverine nutrient concentrations, their causes and the uncertainty of ecological consequences.	
	Agricultural Catchment programme commenced in 2008 will feed into the 2 nd review of the SI 378 (2006) and SI 101 (2009).	The plan acknowledges that the agricultural catchment programme will determine the requirement for further measures for agriculture however such measures are included in appropriate circumstances in the FPM sub basin plans
	Until publication of results of Agricultural Catchments Programme there will be a lack of scientific evidence to support the view that measures adopted under the SI 378 and 101 (2009) would be insufficient to reach the targets of the WFD.	
IBEC SE_RBMP_048	IBEC wants reassurance that appropriate stakeholder interaction takes place post-consultation to ensure transparency Open and bottom-up consultation should ensure that there is no ambiguity about costs and benefits of supplementary measures and vindicate, or cause the reappraisal of, stated objectives.	These comments have been noted and forwarded to the EPA for consideration
Waterways Ireland SE_RBMP_049	Waterways Ireland would seek to ensure that as the River Basin Management Plans are developed its statutory functions and obligations are fully incorporated through agreed sustainable and reasonable methodologies	This comment has been noted and will be considered in the implementation process.
South Tipperary County Council SE_RBMP_014	It is the opinion of South Tipperary County Council that many of the objectives set out in the draft plan are overly ambitious, unrealistic and unachievable given the current shortage of resources in this local authority. The draft plan does not utilise the facility in the Water Framework Directive to plan and prioritise improvements over successive implementation cycles. It is unclear from the RBMP publications how extensively the measures were appraised to assess 1) how costly they would be to implement 2) whether or not they are cost effective, and 3) if they can be achieved within the required timeframe. The cost of implementing the RBMPs must be justified and staggered over successive planning cycles allowing improvements and investment to be prioritised in water bodies where they will be most cost effective and most beneficial.	Comments noted. Additional details on prioritisation, timing and implementation will be available following compilation of the implementation programmes for the Districts. Local Authorities recognise the challenge and the necessity of obtaining adequate resources to ensure that existing legislation is enforced. Substantial resources are committed going forward to ensure local authorities have the resources to implement the requirements of the Water Framework Directive.
IRISH WILDLIFE TRUST SE_RBMP_020	Sampling methodology needs to be transparent so validity can be assessed.	Comments noted and forwarded to the EPA. Final classification will be assigned by the EPA in 2011 in accordance with the recent surface water

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	Sampling in middle of lakes is inappropriate as most dilution occurs here. Most serious problems of pollution are not addressed or identified as this is where most dilution occurs	regulations
	Lack of info on monitoring sites. Reasons for these locations, nature of monitoring and monitoring results. Concern over possible shortcomings and opposite effect to informing the public and encouraging them to support and assist in achieving the WFD objectives.	
	Provisions for alterations mid plan based on new knowledge of water body classification should be allowed for within the plan.	
	Lack of independent technical expertise to assess documents produced are valid and correct. Third part assistance is required to assess consultants outputs.	All background information has been made available and information/meeting requests will be considered.
	Central authority required with power and resources to enforce controls.	This comment has been noted
	Enforcement is not given adequate attention in the plan	Enforcement is considered as an ongoing issue throughout the SWMI, draft plan and final plans
Laois County Council SE_RBMP_025	If it is felt that a more focussed approach would concentrate efforts on measures that would have very significant benefits and may be more cost effective	Additional details on timing of implementation of measures, including cost effectiveness analysis, will be available following compilation of the implementation programmes for the Districts.
	This council will also seek to implement supplementary measures where they are deemed to be practicable, appropriate, effective and value for money	This comment has been noted
	It is not likely that Laois County Council will be in a position to have carried out all necessary infrastructural works to bring water quality in the river bodies affected up to the required standards by 2015	This comment has been noted and forwarded to the DEHLG for consideration
	Some of the river bodies have no water quality data recorded for them and their status is extrapolated from data in a neighbouring sub-catchment. The quantity and nature of required actions to be carried out by the Council therefore cannot be established at this time	These comments have been noted and forwarded to the EPA for consideration. Final classification will be assigned by the EPA in 2011 in accordance with the recent surface water regulations
Offaly County Council SE_RBMP_033	Offaly County Council propose the deferral of the adoption of the Plan for at least 1 year to allow for realistic planning and implementation timeframes	Implementation plans are to be developed by Local Authorities in accordance with the WFD. Timing is dependent on technical feasibility (for example whether additional information is required) as well as cost effectiveness analysis. Additional details on timing of implementation will be available following compilation of the implementation programmes for the Districts.
	The plan should address the resources, financial and human required for implementation	
	The proposal that all basic measures must be fully implemented in County Offaly in order to achieve good status will be excessively onerous on Local Authority resources	

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Organisation	Implementation	Responses
Kilkenny County Council SE_RBMP_007	It is respectfully submitted that specific, targeted resources are identified in the Plan to meet the programme of measures set out in the Plan	Substantial resources are committed going forward to ensure local authorities have the resources to implement the requirements of the Water Framework Directive. This comment has been noted and forwarded to the DEHLG for consideration
	It is considered by Kilkenny County Council that enforcement/implementation measures as specified in the Draft Plan do not fulfil these resource requirements	This comment has been noted and will be considered in the implementation process.
WATERFORD COUNTY COUNCIL SE_RBMP_046	Clarification of funding source for both basic and supplementary measures is required	These comments have been noted and forwarded to the DEHLG
	Currently, it is beyond the scope of Waterford County Council to implement some or all of the basic and supplementary measures	
SOUTHERN REGIONAL FISHERIES BOARD SE_RBMP_044	The Draft Plan has not identified the priority waterbodies in which action is required so as to attempt to achieve the objectives of the WFD, and the rationale behind such priority should be given	Priority waterbodies for investment together with the rationales will be available following compilation of the implementation programmes for the Districts
Pat Conlan SE_RBMP_037	We respectfully submit that the Draft RBMP should be enhanced through the inclusion of a series of priority projects	Priority waterbodies for investment together with the rationales will be available following compilation of the implementation programmes for the Districts
Kildare County Council SE_RBMP_039	Current restrictions on capital spending will likely have a considerable impact in the delivery of this programme	Substantial resources are committed going forward to ensure local authorities have the resources to implement the requirements of the Water Framework Directive. These comments have been noted and forwarded to the DEHLG for consideration
	In instances where the necessary infrastructure has been out in place, adequate resources must be provided to operate and maintain it to the required standard	
	Kildare County Council wish to seek clarity on the role of an RBD Office in co-ordinating the implementation of the Plan	This comment has been noted and forwarded to the DEHLG
Wexford County Council SE_RBMP_022	The plan as drafted fails to assess the resources which will be required for implementation of basic and supplementary measures	Additional details on prioritisation, timing and implementation will be available following compilation of the implementation programmes for the Districts.
	It would be remiss of Wexford County Council to adopt a Plan which does not clearly identify the resources required for the implementation stage	Substantial resources are committed going forward to ensure local authorities have the resources to implement the requirements of the Water Framework Directive. This comment has been noted and forwarded to the DEHLG for consideration
	It is the view of Wexford County Council that the targets in the plan may be	The comment has been noted and forwarded to the EPA for consideration

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Organisation	Implementation	Responses
	overly ambitious	
	A National High Level Steering Group should be established at the earliest opportunity, to steer the draft Plans through adoption and implementation stages and to tackle issues which are of national relevance	A WFD high level implementation group has been established by the DEHLG
	It is unlikely that a RBMP will be adopted in County Wexford prior to December 2009	This comment has been noted and forwarded to the DEHLG
Carlow County Council SE_RBMP_023	The objectives set out in the draft plan are too ambitious, unrealistic and unachievable given the current shortage of resources. The plan needs to be redrafted and re-examined and the objectives amended to reflect what is achievable given technical and financial constraints	Substantial resources are committed going forward to ensure local authorities have the resources to implement the requirements of the Water Framework Directive. This comment has been noted and forwarded to the DEHLG for consideration
	The Plan sets objectives common to all water bodies rather than adopting a prioritised response based on the sensitivity of the water body, protected area status, technical feasibility and economic cost and benefits of achieving set objectives	Objectives have been established in the plan for all waters. Additional details on prioritisation, timing and implementation will be available following compilation of the implementation programmes for the Districts.
	It is considered that rational and prioritised approach based on the sensitivity of habitats with the waterbodies, technical feasibility and costs is required for the final plan.	Measures will be applied on a waterbody by waterbody basis as required. Timing is dependent on technical feasibility (for example whether additional information is required) as well as cost effectiveness analysis. Additional details on timing of implementation will be available following compilation of the implementation programmes for the Districts.
	We propose that the process of setting the objectives in the Plan be reviewed and that ambitious but realistic environmental objectives are put in place for each waterbody	To be considered in review of objectives for plan. However, substantial resources are committed going forward to ensure local authorities have the resources to implement the requirements of the Water Framework Directive.
	Specifically we propose the objectives would be amended to reflect staged improvements over the 3 cycles of the RBMP, provided the necessary resources are made available to enable Local Authorities implement the POM	
	The direct and indirect costs of implementing the RBMP should be considered	Substantial resources are committed going forward to ensure local authorities have the resources to implement the requirements of the Water Framework Directive.

3.2.18 Additional Issues

Organisation	Additional Issues	Responses
AN TAISCE SE_RBMP_041	Turloughs have not been adequately addressed by the Draft Plan, yet they are an important surface water which need to be accounted for more thoroughly throughout the Plan.	Designated sites are included as protected areas and objectives set accordingly
BIRDWATCH IRELAND	Concerned of the lack of emphasis on protection of wetlands.	Designated sites are included as protected areas and objectives set

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Organisation	Additional Issues	Responses
SE_RBMP_035		accordingly
	The lack of the use of indicators of biological condition - such as wild birds	This comment has been noted and forwarded to the EPA for consideration
CENTRAL FISHERIES BOARD SE_RBMP_036	Concerned of the lack of emphasis on protection of wetlands.	Designated sites are included as protected areas and objectives set accordingly
	Concerned of the lack of actions to buffer water bodies and wetlands in planning decision-making processes	Controls fall under the existing planning and development control process
	CFB propose that Integrated Constructed Wetlands (ICWs) be considered as a supplementary measure in the Draft Plan. Such systems should be designed by engineers and scientists and installed and operated under their supervision. A Guidance document for their siting, construction and installation is currently being compiled by the Integrated Constructed Wetlands Steering Group and Scientific Committee under the auspices of the Department of Environment Heritage and Local Government, as currently there is a lack of agreed design criteria for these systems. These systems should also be subject to the planning process and a strategic environmental survey must be a prerequisite of the planning process. Final discharge quality must comply with an effluent discharge licence. As regards plant species, only native species from native stock should be used.	Integrated constructed wetlands are considered as a possible measure in appropriate locations
GSI SE_RBMP_036	Consideration might be given to the development of response matrices for roads, similar to existing response matrices for landfills developed by the Environmental Protection Agency (EPA) and the GSI. The National Roads Authority (NRA) is currently funding a research project on "Analysis and development of road drainage systems for different geological environments in Ireland.	This comment has been noted and forwarded to the EPA and NRA for consideration
IFA SE_RBMP_032 SE_RBMP_027 SE_RBMP_029 SE_RBMP_030 SE_RBMP_018	IFA propose the establishment of an environmental works programme for each of the rivers in the SERBD to increase river capacity by tree cutting and vegetation growth control and to remove silt in critical areas.	These comments have been noted and forwarded to OPW for consideration under Floods Directive Management Plans
	IFA propose the establishment of a national river maintenance budget to protect wildlife such as the corncrake, the regeneration of the freshwater pearl mussel and the livelihoods of the thousands of farm families who loose crops annually due to flooding.	
SWAN SE_RBMP_052	The negative impacts and risks posed by so-called "land reclamation", i.e. infilling of low-lying ground/wetlands is not addressed. The Land Drainage Act must be revoked to remove the incentive for such drainage	Such initiatives are included as measures in the plan

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Organisation	Additional Issues	Responses
	Floodplain restoration should be proposed as a measure.	
	The complimentary use of reedbeds for wastewater 'polishing' should be proposed and their wider use researched	
	The Plan must include a measure to reduce trends to creation of increased impermeable surfaces in developments. It must also address the inadequate use of swales (under SUDS), as a requirement in new road development.	SUDS are included in the plan as a measure
	Windfarms are not addressed in the Draft Plan.	Wind farms fall under the existing planning and development control process and these will be informed and supported by the risk based approach being taken in developing the plans
BORD NA MONA SE_RBMP_012	It is Bord na Mona's intention to continue to treat surface water runoff from active peat production peatlands under IPPC Licence by the EPA.	These comments have been noted and forwarded to the EPA
	It is not Bord na Mona's intention to retain silt ponds on cutaway peatlands after bog rehabilitation has been completed.	
	Bord na Mona confirms that it intends to continue to comply with the ELV's of their licence	
	Bord na Mona do not believe that the introduction of Emission Limit Values on the IPPC Licence for peat extraction for nutrient emissions is appropriate	
	In relation to private peat producers operation on bogs >50 hectares, Bord na Mona agree that these producers should be licensed under the IPPC Licensing system	
	In relation to small private peat enterprises (which include small commercial producers of domestic fuel peat and horticultural peat). It is Bord na Mona's view that these should be subject to an effluent discharge licence under the Local Government (Water Pollution) Acts 1977 and 1990	
South Tipperary County Council SE_RBMP_014	There are 163 no. water bodies in South Tipperary County Council, 60 no. of these water bodies are less than 10km ² (the smallest is 0.31km ²). These should be aggregated as per Chapter 5 of WFD CIS Document No. 2 Identification of Water Bodies.	This comment has been noted and forwarded to the EPA for consideration
IRISH WILDLIFE TRUST SE_RBMP_020	The benefits of wetland functions are not recognised in the draft Plan and proposed measures to protect them are either missing or inadequate.	The designated sites are included as protected areas and objectives set accordingly
	Waste water treatment plants should be set back from water bodies to allow for additional use of reedbeds that can polish water and to act as a safety valve to handle variable waste flows. A positive attitude to reed bed systems is needed amongst local authorities, planners and environment staff.	This is considered as a measure in appropriate locations

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Organisation	Additional Issues	Responses
	No elaboration in draft plans of how the Plans will be integrated with the Floods Directive	This is addressed under the links to plans and programme section of the plan
	There is insufficient licensing and enforcement of peat extraction and peat extraction is not adequately addressed in the draft plan.	Peat extraction has not been identified as a significant water management issue to date however the plan includes existing controls to address this pressure
	Construction of windfarms is a problem for siltation of waterbodies. This issue is not adequately addressed in the draft plan.	Wind farms fall under the existing planning and development control process and these will be informed and supported by the risk based approach being taken in developing the plans
Laois County Council SE_RBMP_025	The OPW has a greater role in morphology. The Council are concerned that other bodies may not be able to carry out necessary works	This comment has been noted and forwarded to OPW for consideration under Floods Directive Management Plans
Offaly County Council SE_RBMP_033	We propose that a single I.T. platform should be used across all RBD's to manage all data and progress reports. This should be linked to both MCEI and EDEN	This comment has been noted and forwarded to the EPA for consideration
John Rowe SE_RBMP_009	Ireland has always had great environmental laws and has always fallen short of enforcing them	Proper enforcement of existing legislation is essential to the success of implementing the Water Framework Directive and achieving good water status. The Minister of the Environment recently launched a report on the enforcement of environmental law in Ireland and announced that an increase in funding of over 40% has been secured for the EPA. Extra resources will also be made available to the National Parks and Wildlife Service.
	Will the enforcing authorities keep ahead of those who exploit loopholes to frustrate the spirit of any enactment	The Office of Environmental Enforcement within the EPA is dedicated to the implementation and enforcement of environmental legislation in Ireland.
	Minor points are that the data on which much of the decisions are based are already out of date and incomplete	Final classification will be assigned by the EPA in 2011 in accordance with the recent surface water regulations. Additional data will be gathered and shall continue to be gathered as part of the monitoring process
Athy WWTP SE_RBMP_010	In current site developments anywhere there is a car parks going over streams, they are being piped and covered. Do they need permission to do this?	Planning authorities ensure that best practice is adhered to and all relevant risks are assessed when analysing planning applications for developments. The Planning and Development Regulations 2006 require that planning authorities notify and take advice from Regional Fisheries Boards of developments that would involve the carrying out of works in, over, along or adjacent to water bodies and wetlands, and to ensure that existing rights of way and access are maintained.
IFA LAOIS SE_RBMP_017	IFA propose a maintained drainage programme on all rivers in the South Eastern District to alleviate flooding in farm land	This comment has been noted and forwarded to OPW for consideration under Floods Directive Management Plans

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Organisation	Additional Issues	Responses
PORT OF WATERFORD COMPANY SE_RBMP_051	The Port requests that any changes of relevance to any port related activities which may be proposed, be notified to the Port	This comment has been noted
EASTERN REGIONAL FISHERIES BOARD SE_RBMP_045	The ERFB believes that open access to the real-time data monitoring system (EDEN etc.) should be available to the Board	This comment has been noted and forwarded to the EPA for consideration
	The Board is anxious that the proposed legislation i.e. Draft European Communities Environmental Objectives (Surface Waters) Regulations 2008 would be signed in as soon as possible	These comments have been noted and forwarded to the DEHLG. The regulations have been signed since the submission was received
	The earliest possible notification to the ERFB of further proposals for exemptions or derogations is requested	
SOUTHERN REGIONAL FISHERIES BOARD SE_RBMP_044	It is recommended that the various maps showing ecological and chemical status be updated to present the most currently available factual information	This comment has been noted
	No reference has been made to use of the relevant provisions of the Fisheries Acts in the context of the control by Fisheries Boards of pollution	These comments have been noted and forwarded to the EPA for consideration
	It is submitted that the powers and functions of the Fisheries Boards be recognised and the Fisheries Boards included as a joint lead authority	
	Notification of local authorities of accidental spillages and discharges of polluting material should be extended to also include notification of the Fisheries Boards	
Kildare County Council SE_RBMP_039	There could be more clarity on where waterbodies are located e.g. simple table showing each water body code, name, status, objective, administrative area, etc.	Watermaps has been updated
	It is not considered that the classifications accurately reflect the status of waters in the SERBD. The data used in some cases is not up to date, unclear as to its origin and the reasons for test failures	This comment has been noted and forwarded to the EPA for consideration
Rita Canney SE_RBMP_028	Levels of referral to the OPW for bridge developments, in general - I would recommend liaison with the OPW in this regard	This comment has been noted
Wexford County Council	It is quite difficult for Local Authorities and very difficult for the public to access the underlying data and to clearly link cause and effect	Additional explanatory information is available in the background documents

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Organisation	Additional Issues	Responses
SE_RBMP_022	The Plan should clearly identify and quantify the reason or reasons for problematic water quality in each sub-catchment. This information should be brought to a readily accessible level in the Plan, preferably by linking the sub-catchment maps by GIS to databases	These comments have been noted and forwarded to the EPA for consideration
	Monitoring and investigation of water quality, which will involve considerable expense, should be concentrated on bad, poor and moderate quality waters, and that good and high quality waters might be subject to somewhat less intensive monitoring and investigation unless deterioration is noted	
IRISH WILDLIFE TRUST WATERFORD BRANCH SE_RBMP_024	Waterbodies are impaired for reasons other than hydrology and the wider ecological issues such as habitat restoration must have a place in the SERBMP	Wider ecological issues are addressed through out the entire plan through improving/restoring the ecological status of all water dependent ecosystems, which includes habitat restoration
	Catchment areas within the SERBD should be restored as close to their "pre-degradation state" as is possible	These comments have been noted
	Implement best management practices that restore natural hydrological processes while supporting human needs	
	Develop hydrologic models to restore natural catchment water balance and natural hydrologic dynamics	
	Create adequate buffer zones around wells, lakes, streams and rivers	These are included in the measures
	Introduce run-off reduction programmes to reduce volume of peak flow to waterbodies	This comment has been noted
	Prohibit developments on floodplains	This will be addressed under the Floods Directive and guidance
	Enhance the few remaining wetland areas within the SERBD	Designated sites are included as protected areas and objectives set accordingly
	Identify and re-hydrate drained wetlands	
	Promote the re-colonization of native wetland plants	
	Provide methods for containment, interception and cleansing of road wash in urban and urban fringe locations	SUDS are included in the plan as a measure
	Cease direct piping of contaminated surface run-off and road wash into waterbodies	
	Very little focus has been placed on the remediation of illegal dump sites that are dispersed throughout the SERBD	These is addressed under Point and diffuse sources: landfills, quarries, mines & contaminated lands
	We would suggest that all developments likely to have water quality implications, or those in or adjacent to wetlands, estuarine, coastal areas be subject to an EIA	Planning authorities ensure that best practice is adhered to and all relevant risks are assessed when analysing planning applications for developments. The Planning and Development Regulations 2006 require that planning authorities notify and take advice from Regional Fisheries Boards of developments that would involve the carrying out of works in, over, along or adjacent to water bodies and wetlands, and to ensure that existing rights of way and access are maintained.

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Organisation	Additional Issues	Responses
	Assessment of progress against the RBMP and reporting should be defined. An annual report to the public by an independent body is necessary to create transparency	This comment has been noted and forwarded to the EPA for consideration
	There is evidence that integrated constructed wetlands have limitations and may not be the panacea to over development in rural areas	This comment has been noted.
Organisation	Coastal Zone / Marine and Estuarine Waters	Responses
SWAN SE_RBMP_052	The monitoring programme for coastal waterbodies must be implemented immediately if Ireland is to be in compliance with Article 8 of the Directive. The Plan must then be amended, mid cycle if necessary to take account of the resulting classification.	Implementation of monitoring is ongoing, the final classification of status will be completed in 2012 in accordance with the recently introduced surface water regulations
	The National Integrated Coastal Zone Management strategy in draft form for years, must be reviewed with public consultation and implemented	This comment has been noted
IRISH WILDLIFE TRUST SE_RBMP_020	No mention of coastal zone management in the draft Plan which will be required to address the challenges for good ecological status.	This comment has been noted
	No modifications along the coasts are identified in the Draft Plans. This information is held by the OPW.	These were considered in the morphology assessment
	Shipping issues are not addressed like oil spills, tanker groundings etc.	Existing control measures are included in the plan
EASTERN REGIONAL FISHERIES BOARD SE_RBMP_045	We request that the SERBMP address water quality in these coastal/estuarine areas as we believe that the proportion/scale of pollution in such waters may be significantly elevated	This comment has been noted and forwarded to the EPA for consideration
	The Board would also like to highlight our concerns regarding the fact that much of the coastline of the SERBD has not been classified yet	These comments have been noted and forwarded to the EPA for consideration. Final classification will be assigned by the EPA in 2011 in accordance with the recent surface water regulations
IRISH WILDLIFE TRUST WATERFORD BRANCH SE_RBMP_024	How does the RBMP integrate with CLAMS and the ICZMP	Included in links to plans and programmes section of the RBMP
Organisation	Groundwater	Responses
SWAN SE_RBMP_052	Detailed information on the nature and location of ground waters, recharge rates, specific point source discharge licenses to them and other known information must be made available.	These have been considered in the risk assessment process.

Organisation	Additional Issues	Responses
TEAGASC SE_RBMP_055	Groundwater waterbodies should be considered under the heading of extended deadlines also	Extended deadlines have been considered for some groundwaters (mainly related to mine impacts)
GSI SE_RBMP_036	There is less awareness of groundwater as a pathway for contamination and of groundwater supporting surface water flows, than groundwater as a body of water that can be at risk of contamination or over-abstraction.	This comment has been noted
	Groundwater is a receptor in its own right, and is also a pathway for contamination to travel to surface water ecosystems. As such, a greater consideration of discharge to groundwater is needed than exists at present. Several suggestions are made	Transfers between groundwater and SW has been taken into consideration
	Geothermal energy exploitation is not addressed in the Draft RBMP.	This has not been identified as a significant issue to date.
IRISH WILDLIFE TRUST SE_RBMP_020	Attention to ground water is significantly less than give to surface waters.	All groundwater requirements have been addressed in the plan (status objectives and measures)
	Need to be considered and addressed as one of most unique habitats and rare on a European Level.	Turloughs are considered amongst the groundwater dependant habitats
IRISH WILDLIFE TRUST WATERFORD BRANCH SE_RBMP_024	Protecting springs and seeps from ground-disturbing activities such as land reclamation and development	These have been considered in the risk assessment process.
	Protect the local hydrology from inappropriate development in areas with high quality groundwater-dependent communities	Planning authorities ensure that best practice is adhered to and all relevant risks are assessed when analysing planning applications for developments.

3.2.19 Basic and Supplementary Measures

Organisation	Basic and Supplementary Measures	Responses
AN TAISCE SE_RBMP_041	Many of objectives are unclear and not specific enough. Has the Draft Plan avoided setting objectives for waters it has not classified yet or is it indicating that by 2027 not all the waters will meet the WFD objectives?	Objectives have been established for every waterbody in the plan
	The Plan needs to be clearer about what is required to achieve good status for each water body and the cost involved.	Objectives have been established for every waterbody in the plan
	The Draft Plan has not addressed each Supplementary measure as to how it will be carried out, nor has the Draft Plan indicated which individual water body needs which particular supplementary or basic measure.	Measures have been identified for each waterbody and the implementation plans are to be prepared
	The extent of risk posed by different problems varies by water body, therefore the action taken needs to be tailored to each.	

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Organisation	Basic and Supplementary Measures	Responses
	For how long will the Basic measures be applied before it is determined that they are insufficient to meet good quality water status and Supplementary measures must be used, has not been indicated within the Draft Plan. This must be considered and discussed in the actual management plan.	The programme of measures, basic and where appropriate, must be implemented by 2012
	If no use of supplementary measures is anticipated until 2015, then the Draft Plan is plainly misleading and it is disingenuous at best to invite the public to consider these options without making clear that they will not be carried out before 2015.	
	The Draft Plan also states in Step 6 that several alternative Supplementary measures may be used for any one issue, yet no analysis has been done within the Draft Plan which weighs up the costs and benefits of the different options, both economic and ecological.	Costing of wastewater and on-site system measures has been undertaken for all water management units. The plan clarifies the recent proposals on water pricing policy and also confirms that economic analysis has not been used to extend deadlines for the final plan.
	Whilst 'strengthened enforcement' is cited as a measure, there is no real indication of how this is going to be achieved. There does not appear to be any monitoring of trends or changes in enforcement, so how will it be determined that 'improved enforcement' is being achieved?	A WFD high level implementation group has been established by the DEHLG
	In relation to agriculture, one of the most significant pressures, no additional measures are proposed, (only possible measures are proposed) until the review of the Good Agricultural Practices (Nitrates) Regulations.	The agricultural catchment programme will determine the requirement for measures, however, further measures for agriculture are included in the FPM sub basin plans
	Draft Plan does not demonstrate that these measures have been assessed for possible knock-on effects.	The SEA process has addressed this issue
	Water conservation measures are not adequately dealt with and Water Harvesting needs to be addressed within the Draft Plan	These are included as measures for abstractions
	The Draft Plan signifies the Supplementary measures will need to be both technically feasible and ecologically sustainable, but it does not indicate that the measures will be piloted when introduced.	Measures will be piloted if appropriate
	Grey water use/ re-use/ recycling is also not addressed.	These are included as measures for abstractions
	The basic measures listed in relation to the birds and Habitats Directives needs to include the DAFF as a lead agency in the listed Actions.	This comment has been noted
CENTRAL FISHERIES BOARD SE_RBMP_036	It is not apparent that the use of basic measures on their own will be sufficient.	It is acknowledged that in some cases implementation of the Basic Measures will not be sufficient to guarantee good status in all waterbodies. A suite of Measures is included in the Plan to aid in achieving good status where necessary.
	Baseline surveys should be carried out prior to development which would include fish population monitoring and post development fish monitoring. There should be a systematic review of impacts caused by small hydropower schemes which allow an assessment of the mitigation measures.	This suggestion has been forwarded to the LA and DCENR for consideration during development of these projects

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Organisation	Basic and Supplementary Measures	Responses
	The OPW should continue to be encouraged to undertake drainage operations sensitively and where practicable to restore the fish habitat in co-operation with the fisheries service and the lead local authority.	This suggestion has been forwarded to the OPW.
	While it is noted that hydromorphology and hydrology are classed under supplementary measures, this should not preclude small scale initiatives in relation to flow manipulation, substrate manipulation and riparian zone management, particularly where such initiatives are underpinned by fisheries research.	The regulatory process will consider the scale of schemes and appropriate controls
	There is a need for a comprehensive survey of barriers in the RBD similar to the assessment of the Risk of Barriers to Fish Migration in the Nore Catchment.	Physical Modifications Measure includes for impassable barriers investigation
	The maintenance of the hydrometric network and the fisheries service is supportive of plans to upgrade the network, use of continuous flow monitoring devices and most importantly, accurately recording of low flows. The optimum ecological flow should be established for key fisheries and flows should be sufficient to sustain fish populations, maintain water quality and meet the requirements of migratory fish.	This comment has been noted and forwarded to the EPA for consideration
DAFF SE_RBMP_013	Supplementary measures relating to agriculture should not be included in final river basin management plan. Supp measures for agri should only take place on basis of finding of EPA review of EC Good Agri Practice for Protection of Waters and DAFF mini catchment programme findings.	The agricultural catchment programme will determine the requirement for measures, however, further measures for agriculture are included in the FPM sub basin plans
	Measures for High Status and Protected Areas - review controls on use and disposal of pesticides including sheep-dip	Basic measures include for controls of dangerous substances in all waters
	All RBDs - National forestry supplementary measure - reduce pesticide usage	These are included as measures for forestry
	National forestry supplementary measure - maintain registers of pesticide use	
	National forestry supplementary measure - develop biological control methods	
	Table 10 – Remediation Measures: It will be vital to identify to the Forest Service, forest owners and the forestry sector generally, the "number of waters" to which remediation measures apply. Likewise it will be important to identify those that the relevant remediation measures are to apply. This echoes the reference above to the need to share data.	The proposed measures were identified by a Working Group comprising experts from Forest Service, Coillte Teoranta, COFORD, NPWS, EP, Fisheries, Local Authorities, RBD Consultants and International Experts and Academics. The measures identified were supported by research undertaken by UCD and UCC as part of the measures development and establishment of cause and effect. The Working Group recognised that some of the proposed measures would require to be trialled out at a catchment scale to determine their effectiveness. Some further research is being undertaken under the HYDROFOR Project.
	S2. The area unit should be "water body" as distinct from catchment of stream order. Water body is used for risk categorisation and for reporting. Therefore calculating critical loads would seem more relevant if based on Water Body since water bodies are land units that, unlike catchments, consist of more or less homogenous characteristics such as geology,	

Organisation	Basic and Supplementary Measures	Responses
	topography and soils etc.	
	S3. It is extremely difficult to ensure that samples are taken under "high flow conditions". The existing practices (i.e. the Protocol for the Determination of the Acid Sensitivity of Surface Waters in the Context of Afforestation - the acid sensitive protocol) attempts to do that by spreading and specifying the sampling season in 4 months in the period February to May.	
	S4. A definition of peat soil type (or peaty soil) is required. The document does not define peat - peat is not a homogenous entity– some are mineralised through agricultural usage, some are cutover, some are unenclosed and not used for intensive agriculture, some support intensive agriculture, some adjoin water stretches at risk. The soils definition of an Irish peat bog is a peat layer >30cm on drained peats and > 45cm on undrained peats (Hammond, 1979) See Teagasc data set.	
	S5. The assumption here seems to be that broadleaves are good and conifers are bad. The type of crop is not the source of potential risk - it is the type of practice.	
	S7. This cell should contain the following text in order to make it more meaningful. <i>"This can be achieved through planned felling. Reforestation should entail riparian zones, mixtures of species where possible, appropriate drainage layouts and more open spaces."</i>	
	S8. Greater clarity would be achieved by stating the objective of the "auditing". Suggested text to illustrate an objective may be "Such auditing to identify for example preferred flow paths, opportunities for increasing the retention time of water on site".	
	S9. The focus should be on ensuring there are no impacts rather than reducing use – there is not a clear correlation between the volume of usage and impact. Water sampling carried out by the Forest and Water studies do not establish any chemicals from forests in the receiving waters.	
	S.11 Please note: End-users of plant protection products for professional use are already legally required to maintain records of use in accordance with the requirements of S.I. No. 381 of 2006 [European Communities (Authorization, Placing on the Market, Use and Control of Plant Protection Products) (Amendment) (No. 4) Regulations, 2006]. Details must be kept for each product of the brand name, the PCS number, the date(s) of application, the crop and area treated, and the quantity applied.	
	S13. Application of basic material to counteract the acidification processes is not practical due to access difficulties. It poses the risk that if carried it out could generate large volumes of mobile sediment due to soil disturbance, not to mention pulses of basic inputs that could impact negatively on downstream fauna	

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Organisation	Basic and Supplementary Measures	Responses
	Supplementary Measures Point And Diffuse Sources: Forestry. Pages 101 and 102. Mention is made of "Prioritised Sites" in this Section. These need to be defined or clarified in the Plan - it is assumed that these are the areas (e.g. "Water Bodies") that may impact on the "number of waters" mentioned in relation to Table 10. This should be clarified in the Plan.	
EPA SE_RBMP_043	Integration of SEA and HDA recommendations: Indicate in final report how mitigation measures, which were identified in ER and HDA, were integrated into the POM.	A summary table has been provided in the Plan linking the measures to the likely significant environmental effects and identified mitigation measures from the SEA and HDA.
	Clarification on whether supplementary measures for physical modifications are required only for river waterbodies.	The morphology measures include marine and freshwater measures, however some are only applicable to rivers
	Unique coding system for supplementary measures.	This has been included in the plan
SWAN SE_RBMP_052	Clarify the timing for the introduction of all Supplementary Measures and the reason(s) for this.	Measures will be applied on a waterbody by waterbody basis as required. Timing is dependent on technical feasibility (for example whether additional information is required) as well as cost effectiveness analysis. Additional details on timing of implementation will be available following compilation of the implementation programmes for the Districts.
	Concerned to read that, in relation to Protected Areas, even after the implementation of the current Water Services Investment Programme, 173 water bodies containing protected areas will still be at risk from point source discharges. This is inconsistent with the statement that basic measures will secure good status for all Protected Areas by 2015.	The current WSIP focuses on UWWTD requirements, further basic and requirements are considered under the WFD for protected waters and other waters
	All measures listed are to be supported and are urgently required in many sites, but where and when are they going to be applied? How can the Plan provide an assessment of what supplementary measures will achieve when the measures themselves have not been selected?	Measures will be applied on a waterbody by waterbody basis as required. Timing is dependent on technical feasibility (for example whether additional information is required) as well as cost effectiveness analysis. Additional details on timing of implementation will be available following compilation of the implementation programmes for the Districts.
	A list of waterbodies for which alternative objectives are being applied must be provided with justifications according to strict WFD criteria.	This information is included in the plan
IBEC SE_RBMP_048	IBEC supports the implementation of the most cost effective measures	These comments have been noted and will be considered in the implementation process.
	The financing deficit that government is currently experiencing should not brand certain measures, which until recently were affordable, as disproportionately expensive	
	To ensure maximum value for money any contracts which arise as a result of this cost analysis should be variable to exploit the opportunities arising from falling prices in the economy	
	Business is concerned that proposals for charging may be considered as a	

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Organisation	Basic and Supplementary Measures	Responses
	revenue raising exercise for local authorities	
	Business customers require high quality water supply as a pre-requisite component and aid to operations	
	A more integrated approach to the planning and implementation of capital investment projects is required given the range of planning and investment bodies across sectors	
Animal and Plant Health Association SE_RBMP_005	It would be appropriate that any measures contemplated within the River Basin Catchment Plans be fully discussed and agreed with the relevant competent authority (Pesticide Control Service of the Dept of Agriculture).	All proposed measures will be discussed in detail with all relevant competent authority.
IRISH WILDLIFE TRUST SE_RBMP_020	Very few concrete actions/measures are directly proposed in the plan. Few measures beyond legislation already in place are proposed. Enforcement improvements are difficult to identify. Not clear if Supplementary Measures will only be introduced if Basic measures don't deliver good status	Measures are included where appropriate - this includes investigation of the need and effectiveness of measures.
Kilkenny County Council SE_RBMP_007	It is the view of Kilkenny County Council that the Programme of Measures (including Basic Measures and Supplementary Measures) lack specificity	Measures will be applied on a waterbody by waterbody basis as required. Additional details on prioritisation, timing and implementation will be available following compilation of the implementation programmes for the Districts.
IFA_LAOIS SE_RBMP_017	IFA wish to reject completely the following proposals: Increased inspections by local authorities & the EPA; Creating increased buffer strips; Setting aside land; Reducing stocking density; Reducing levels of land reclamation; Requiring nutrient management planning; Stricter storage or closed periods; Relocation by using digesters in areas of nutrient surplus or tankering in areas of nutrient surplus; New abstraction regulations	A number of agricultural catchment projects are being carried out by Teagasc to consider the efficacy of the implementation of the Nitrate and GAP regulations. The results of these studies will be used to the issues raised.
PORT OF WATERFORD COMPANY SE_RBMP_051	Capital and maintenance dredging is of major importance. To this end the Port requests that the final SERBMP will not impose restrictions to our dredging requirements.	The process of identifying heavily modified waterbodies acknowledges critical uses but also requires mitigation to ensure achievement of good ecological potential taking account of the use
WATERFORD COUNTY COUNCIL SE_RBMP_046	The basic and supplementary measures included in the Draft RBMP should not be as prescriptive as they currently are. They should allow Local Authorities discretion within a waterbody to prioritise resources where the most benefit will result	Measures will be applied on a waterbody by waterbody basis as required. Additional details on prioritisation, timing and implementation will be available following compilation of the implementation programmes for the Districts.

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Organisation	Basic and Supplementary Measures	Responses
	The supplementary measures should be checked more thoroughly to ensure that they are technically feasible within the required timeframe and are not disproportionately expensive before they are included in the RBMP	
Pat Conlan SE_RBMP_037	<p>A new supplementary measure be added to the RBMP that would require Local Authorities to prioritise the construction of approved and funded projects in areas of existing wastewater infrastructural shortfalls in advance of providing for forecast future demand</p> <p>A timeframe of 6 months from the date of funding approval be imposed for the commencement of construction of approved and funded scheme</p>	These comments have been noted and forwarded to the DEHLG for consideration
Kildare County Council SE_RBMP_039	The Plans associated PoMs must therefore be adaptable to take into consideration any changed status, including the possible additional requirements for extended deadlines as more information becomes available	Measures will be applied on a waterbody by waterbody basis as required. Additional details on prioritisation, timing and implementation will be available following compilation of the implementation programmes for the District.
Rita Canney SE_RBMP_028	Trolly dumping in rivers: would it be possible to include an objective in the Plan to investigate and encourage the use of a practical, pollution-prevention measure by all supermarkets operating in this country	This comment has been noted and forwarded to the EPA for consideration
Wexford County Council SE_RBMP_022	The draft plan fails to prioritise the PoMs required to maintain or improve water quality in each sub-catchment	Additional details on prioritisation, timing and implementation will be available following compilation of the implementation programmes for the Districts.
IRISH WILDLIFE TRUST WATERFORD BRANCH SE_RBMP_024	<p>Very few concrete actions/measures are directly proposed in the plan. Few measures beyond legislation already in place are proposed. Enforcement improvements are difficult to identify. The supplementary measures cannot be effective if they are perceived as a "last resort" option</p> <p>Under such a combination of negative pressures, the limited procedures outlined in the Basic Measures will not meet the WFD objectives</p>	<p>Additional measures are included where appropriate - this includes investigation of the need and effectiveness of measures.</p> <p>Where appropriate measures have been identified to support the basic measures</p>

3.2.20 Extended Deadlines

Organisation	Extended Deadlines	Responses
AN TAI SCE SE_RBMP_041	Where derogations from the default WFD objective of Good Ecological Status are applied e.g. the extended deadline until 2027 for rivers and canals waters in the Draft Plan, insufficient information is provided on the justifications for such derogations. Again there is no economic information	The decision making rationale is included in the background documents. Costing of wastewater and on-site system measures has been undertaken for all water management units. The plan confirms that economic analysis has not been used to extend deadlines for the final plan.

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Organisation	Extended Deadlines	Responses
	presented with regard to decisions made on the basis of disproportionate cost.	
EPA SE_RBMP_043	Provide Scientific Reasons for seeking derogations in time scale. (STATUTORY)	The decision making rationale is included in the background documents
Offaly County Council SE_RBMP_033	Extended deadlines should be proposed in the Plan where allowed by the Directive	The decision making rationale is included in the background documents
EASTERN REGIONAL FISHERIES BOARD SE_RBMP_045	The board are concerned that a revised objective deadline has been set for a significant number of WMUs within the area covered by the Board. The Board ask that the reason for these revised deadlines be fully explained	The decision making rationale is included in the background documents
Kildare County Council SE_RBMP_039	A derogation should be requested in respect of the 2015 timeframe An extended timeframe should be sought to allow for the recovery of the waterbodies following the implementation of measures Kildare County Council wish to highlight that an extended timeframe should be sought for waterbodies in the intensive tillage areas e.g. Figile, Athy Stream, Greese, Lerr River Catchments	The decision making rationale is included in the background documents
Carlow County Council SE_RBMP_023	The draft plan does not utilise the facility in the WFD to plan and prioritise improvements over successive implementation cycles	The decision making rationale is included in the background documents

3.2.21 Integration with other Plans and Programmes

Organisation	Integration with Other Plans and Programmes	Responses
AN TAISCE SE_RBMP_041	Other than a brief mention on page 109 of the Draft Plan, there is no elaboration on how the Plan will be integrated with the Floods Directive. Serious consideration should be given to how effective catchment management/ catchment based flood attenuation fostered through the RBD Management Plan could deliver much of the requirements for the Floods Management Plan.	This comment has been noted. Legislation regarding the floods directive will be introduced in 2010 clarifying the requirements and organisational roles. The DEHLG and OPW will progress these mutual implementation issues

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Organisation	Integration with Other Plans and Programmes	Responses
CENTRAL FISHERIES BOARD SE_RBMP_036	The Plan should acknowledge that there is a clear need to develop strategies such as salmon restoration plans that take a holistic approach to issues	These comments have been noted
	There is also a need for the river basin management plan to take into account the existence of the eel management plan for each RBD.	
	The Lough Mask Biosecurity Plan is now being implemented in the WRBD; the plan should encourage the adoption of similar plans for lakes and waterbodies in the RBD. Coarse fish biosecurity planning should also be encouraged.	
EPA SE_RBMP_043	Integration of Plan with other Plans and Programmes including County/City Dev Plans s/b mentioned.	Included in links to plans and programmes section of the RBMP
OPW SE_RBMP_053	It is desirable to coordinate all plans and programmes between the WFD and Floods Directives as far as practicable. OPW envisage that there will be an expanding requirement for all RBDs to coordinate with the OPW to ensure effective and efficient implementation of both Directives for all stakeholders.	These comments have been noted
	Consult with OPW at early stage in the legislative drafting process of the drainage and flood legislation when it commences.	
	OPW's Environmental River Enhancement Programme 2008-2012 will be the primary tool for implementation of the relevant measures by OPW. There will be a need to form a national Hydromorphology POM working group to progress national implementation of the measures and deal with aspects such as technical feasibility and disproportionate costs.	
	As Ireland has taken a minimalist approach to HMWBs and OPW are embracing the challenge of achieving good ecological status it is prudent for Ireland to take a flexible approach in this agenda and be in a position to designate or un-designate waterbodies as the plan cycles roll out.	
IBEC SE_RBMP_048	All Development Plans must take account of these regional guidelines	Included in links to plans and programmes section in the RBMP
	River basin objectives will only be achieved if plans and programmes are coordinated and integrated.	Included in links to plans and programmes section in the RBMP
Animal and Plant Health Association SE_RBMP_005	Were the authors aware of the proposed National Action Plan for sustainable use of Pesticides.	These are included in the links to plans and programme section

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Organisation	Integration with Other Plans and Programmes	Responses
IRISH WILDLIFE TRUST SE_RBMP_020	Flood Management Plans that are currently being drawn up need to be adequately addressed in the Draft Plan.	These are included in the links to plans and programme section
	S.E.A. should be carried out by an independent group and not carried out by consultants involved in drafting the RBD Plans. I will in effect render SEA useless.	The SEA has been carried out in accordance with statutory requirements
Offaly County Council SE_RBMP_033	The implications of the Draft Surface Water regulations should be expressed in the Plan	These requirements are included in the measures sections
Rita Canney SE_RBMP_031	All Development Plans should contain specific, unambiguous and robust policies, objectives and development management standards concerning the protection of watercourses, riparian and buffer zone areas and other aquatic/semi-aquatic and associated habitats and their buffer zones.	These are included in the links to plans and programme section
	Development Plan objectives should be internally consistent in respect of the approach to be taken to watercourses and their riparian/buffer zone areas in the planning process	These comments have been noted
	There is a need to ensure that a body with a specific overview of the WFD/RBMP can input to the Development Plan and other strategic - plan making processes	
	I would suggest that there is a need to further boost the protection afforded to watercourses, riparian and buffer zones areas and other aquatic/semi-aquatic and associated habitats and their buffer zones through the use of Development Plan objectives and policies, by the use if improved, additional planning tools and protective measures, such as, supporting Planning Guidelines/Supplementary Planning Guidelines, Byelaws, Improved Planning Enforcement, Designations, and Zoning.	
IRISH WILDLIFE TRUST WATERFORD BRANCH SE_RBMP_024	The WFD has to be integrated in to all land use policies, including agriculture, and therefore RBMPs must take into account measures, including future measures, that improve the interface between farming practices and the natural environment - including the aquatic environment	This comment has been noted

3.2.22 Website/Watermaps

Organisation	Website & Water Maps	Responses
AN TAISCE	The use of "n/a" on the water maps is ambiguous.	This comment has been noted. Watermaps has been updated

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Organisation	Website & Water Maps	Responses
SE_RBMP_041	The reporting sheets generated by the interactive water mapping system, WaterMaps[1], for a given water body are difficult to interpret. They are not clear with regard to the environmental objectives for the water body, nor for measures being proposed to reach the objective.	This comment has been noted. Watermaps has been updated
	The references within the Draft Plan, which refer to background documents, are often too vague to be useful.	
	The link to the Background data in the Draft Plan is inadequate and imprecise. Any reference within the Draft Plan should be made back to the exact location of the information.	These comments have been noted. The plan contains more detailed linkages to background documents
	Stakeholder ability to make meaningful input to the Draft Plan is curtailed by lack of access to all the available data. Comprehensive geographical information on locations of threats & pressures and monitoring results are available on the EDEN system, to which public authorities have access. For meaningful public participation to occur, all stakeholders should also have access to this vital information also.	This comment has been noted and forwarded to the EPA who are developing EDEN
CENTRAL FISHERIES BOARD SE_RBMP_036	It is noted that the water maps available on www.wfdireland.ie , though helpful do not show the underlying data upon which they are based. It is important for the fisheries service to know the reasons why a particular water body failed, whether it was due to specific site/sites failure.	These comments have been noted. Watermaps has been updated however the EPA is the source of the classification data. The detail of parameters used in classification is being included in tabular form in water management unit action plans.
	It is important that the underlying tabular data be made available to the Inland Fisheries Service and the general public to foster mutual understanding and interpretation of key issues such as assignment of ecological status of waters.	
	Ideally all reference (national reference sites and references for each biological element) and high status sites within each RBD should be identified on the water maps.	
	The results of SM monitoring for fish in rivers, lakes and transitional waters is published on the website www.wfdfish.ie . It is envisaged that this website will also have a web-based interactive mapping system (in 2009) to show fish status in all RBDs.	
IRISH WILDLIFE TRUST SE_RBMP_020	Background documents are not cited specifically in the plan and are difficult to locate on wfd website: www.wfdireland.ie	This comment has been noted. The plan contains more detailed linkages to background documents

3.2.23 Waterbody Specific Issues

Organisation	Waterbody Specific Issues	Responses
SOUTHERN REGIONAL FISHERIES BOARD SE_RBMP_002	In our opinion Crottys lough should be consider at risk and requires a more thorough assessment	This comment has been considered under reviewed objectives in plan
AN TAI SCE SE_RBMP_041	The draft plan suggests that there are a number of monitoring locations on the tributaries at the headwaters of the Slaney River. The Department of Defence has recent data from independently commissioned monitoring, which does not appear to have been requested by the EPA, which shows that these water bodies are in near pristine condition. However, the draft plan identifies a number as of moderate condition	This comment has been noted and forwarded to the EPA for consideration.
SWAN SE_RBMP_052	Ballyteige Bay should be identified as a Heavily Modified Water Body, but it is not	This comment has noted, further review of such designations require site specific information and will be undertaken periodically during the first planning cycle
NRA SE_RBMP_040	We question the below good status designation of the groundwater dependent ecosystem - Pollardstown Fen	This comment has been noted and forwarded to the EPA for consideration.
Nicholas Grubb SE_RBMP_006	Querying if any aspects of the proposed plan will in any way impinge on their rights to operate a power plant on the River Tar	Restoration measures are being considered as part of the measures and controls required by Article 11(3) of the WFD to ensure that the hydromorphological conditions are consistent with the achievement of the required ecological status. Any alterations to the hydromorphological conditions through the generation of hydro power must therefore be consistent with the achievements of the required ecological status, and will be considered on a case by case basis.
MAXPRO CONSULTANTS SE_RBMP_008	Is it possible to reconcile your classification of good ecological status for the John's River with Aquens Ltd moderately polluted classification on a tributary of the John's River. Is the marsh improving the status?	This comment has been noted and forwarded to the EPA for consideration.
Athy WWTP SE_RBMP_010	Discussions with the SRFB indicate that although the board is not a designated salmonid river the tributaries are important salmon spawning areas. This raises the issue whether the specification (ammonia <5ppm and nitrate <15ppm) should be strictly adhered to	This comment has been noted and forwarded to the Southern Regional Fisheries Board for consideration.

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Organisation	Waterbody Specific Issues	Responses
PORT OF WATERFORD COMPANY SE_RBMP_051	We would like to advise that the Port Company has planning permission for a project of substantial modification from Belview down towards the Barrow Bridge	The comment has been noted
EASTERN REGIONAL FISHERIES BOARD SE_RBMP_045	The Board asks what measures / if any are proposed to protect Margaritifera populations in the Slaney main channel and other tributaries such as the Bann as there was no mention of these populations in the reports relating to these WMU's	Specific sub-basin plans for Freshwater Pearl Mussel's are being developed by NPWS and will be adopted by the Minister
SOUTHERN REGIONAL FISHERIES BOARD SE_RBMP_044	The large proportion of the Nore main channel classified as being of bad ecological status is very surprising The creation of a number of smaller waterbodies within the Nore main channel may present a more positive view in terms of the Nore River system	The EPA has created smaller waterbodies along the Nore
Pat Conlan SE_RBMP_037	If it is understood that the necessary permissions are in place as is the required funding for the Kildare Town WWTP and Sewerage Scheme, yet the whole scheme appears not to be prioritised by the Council Kildare, Waterford and the central axis of Portlaoise / Abbeyleix and Urlingford should be elevated in the Plan from areas of poor water quality to areas which require urgent attention.	This comment has been noted and forwarded to the LA. A methodology for prioritisation of WWTP's has been developed through the RBD's and this will be used to inform the national water services investment program Priority waterbodies for investment together with the rationales will be available following compilation of the implementation programmes for the District
IRISH WILDLIFE TRUST WATERFORD BRANCH SE_RBMP_024	Stradbally Cove is where the Tay River enters the sea - this transitional stretch of water and the Cove are polluted for a number of years by sewerage, yet it does not appear on the report. This is a concern as the Tay is a Margaritifera river The Anne River, flowing through Dunhill, is shown as moderate in status. It is the subject of a recent report by the EPA which found evidence of pollution from the Integrated Constructed Wetland. Also, it is listed as "Dunhill, Tributary of Tramore" - it is not a tributary of any river in Tramore and enters the sea at Annewstown The Garraun Stream in Tramore (listed as "Moonvoy, Trib of Tramore") has not been targeted for channelisation investigation, although the stream has been channelised and could benefit from an investigation as it flows into the Tramore Backstrand SAC Dunmore East stream has serious pollution Tramore Bay - has an assessment of the new sewage treatment plant been included? What is the status of the Couse Stream which flows into Kilbarry Bog NHA?	This comment forwarded to the EPA for consideration This comment forwarded to the EPA for consideration Pilot studies on channelisation of rivers is included in the RBMP This comment has been noted Not at this time but is planned. This stream has not been assessed. This comment/request has been

Organisation	Waterbody Specific Issues	Responses
		forwarded to the LA.

3.2.24 Editorial Issues

Organisation	Editorial Amendments
AN TAISCE SE_RBMP_041	<p>ALL OF THE ORGANISATIONS LISTED ON THIS PAGE SUBMITTED EDITORIAL COMMENTS. FOR FURTHER INFORMATION ON THESE SUBMISSIONS PLEASE CONTACT THE NS2 PROJECT OFFICE.</p>
DAFF SE_RBMP_013	
DCENR SE_RBMP_042	
EPA SE_RBMP_043	
GSI SE_RBMP_036	
IRISH WILDLIFE TRUST SE_RBMP_020	
SOUTHERN REGIONAL FISHERIES BOARD SE_RBMP_044	
Wexford County Council SE_RBMP_022	