



Irish Wildlife Trust
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River Basin Management Plan Consultation,
Water and Marine Advisory Unit Department of Housing,
Planning, Community and Local Government,
Custom House,
Dublin 1

August 31st 2017

Re: Submission to the 2nd River Basin Management Plan (RBMP)

To whom it may concern:

The Irish Wildlife Trust (IWT) wishes to make a submission to the 2nd RBMP.

The persistent decline in the quality of our waterways is now well documented. It is dispiriting that 17 years after Irish politicians agreed to the target of 'good ecological status' for all our waters, this backward slide continues. It can only be concluded that a lack of political prioritisation for protecting our environment is responsible for this – despite the fact the clean water is essential for all life on this island. The continued dumping of raw sewage to water bodies, drainage/destruction of river channels, spread of alien invasive species and plagues (e.g. affecting the White-clawed Crayfish), loss of hills to plantation forestry and unmitigated agricultural expansion continue to exact a heavy toll on our waterways. The pursuit of short-term profit which benefits the few, at the expense of wise land use and the principle of spending public money on public goods, is the root cause of the neglect of our rivers, lakes and coastal waters. This coincides with chronic loss of biodiversity, environmental and landscape degradation and dwindling of rural communities that has accelerated in recent years.

The IWT has lost confidence that the government and state agencies are committed to a healthy environment and the preservation of our natural heritage. The production of yet another plan to placate EU agencies must be as jading for the civil servants who write them as it is for individuals or civil society bodies who are tasked with responding to these so-called 'consultations'. There is no longer even the pretence that these 'public consultations' will actually result in changes to the plans in question, or instil a degree of urgency into the flaccid and disinterested political class. Until politicians are jolted out of their stupor about the state of our environment, even these half-hearted plans, devoid of any ambition or spirit, are doomed. Simon Coveney's words, which introduce the consultation document, that "water is essential for life", have been smothered by his insistence that there are no limits to agricultural intensification, by the continued drainage of rivers like the Bandon in Cork by the

OPW, and by the imminent extinction of the Freshwater Pearl Mussel, Salmon and Eel. A government that can find €50 million for greyhounds and horse racing yet cannot find funds to stop human filth being pumped into the sea at Clifden or Youghal cannot claim to put the public interest first. Beyond the blather that introduces these plans, such as the one in question, senior government ministers are mute when it comes to the pressing need to rescue what's left of our natural environment. It needs hardly be said that the document presented for 'public consultation' is a poor offering – lacking even in the courage to achieve the minimum standard set out by the laws which our government signed up to 17 years ago.

The IWT and our members feel that it is important to point out that the goal of achieving 'good ecological status' is not only achievable and cost effective, but would bring immense value to both people and wildlife across the country. However, to meet this goal will require big changes in attitudes to our landscape and heritage. The solutions we propose are not new and are not even radical – but may seem so given how much destruction has already occurred:

- Agriculture is the biggest source of pollution and the continued expansion of the agri-sector is incompatible with protecting our waterways. Rivers simply cannot cope with the volumes of slurry or the increasing quantities of pesticides that are necessary to sustain this level of intensification. Ireland would be better served with less, more diverse, higher quality production, that lives up to the fantasy advertising campaigns from An Bord Bia (i.e. Origin Green). Away from the lowland dairy pastures, so-called 'high nature value' farming should be applied. Here the goals of protecting landscape, biodiversity and livelihoods perfectly align with protecting water quality.
- The expansion of plantation forestry is an on-going environmental disaster which has obliterated nature on hillsides as well as the communities which once worked the land. The current native woodlands scheme should be massively expanded (by diverting existing funds earmarked for Sitka Spruce) to gradually replace existing stands of conifers in all upland areas. New forests should be planted on artificially open landscapes. The value of our hills for water retention, biodiversity, flood control, carbon storage and recreation far exceeded the mass production of cheap timber which tax payers are currently paying for. In lowlands, the 'Woodlands for Water' is an excellent initiative which should be applied to all major rivers and tributaries.
- The Drainage Acts should be repealed or reformed, and the funds used to keep rivers in drainage schemes in a degraded state should be diverted to restoring flood plains. Habitat creation projects, which aim to slow the flow of water, should be pursued over the failed engineering approach which has reduced so many of our rivers to virtually lifeless ditches.
- The pumping of raw sewage to waterways should stop. This really is a no-brainer.
- Worked-out peatlands should be restored for habitat value and public amenity. All peat extraction activities should be regulated. Industrial scale extraction should cease and the land restored. Subsidies for burning turf should be diverted to retrain workers in sustainable industries.