



**BirdWatchIreland**  
*protecting birds and biodiversity*

**BirdWatch Ireland Submission to the  
Draft River Basin Management Plan**

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## Introduction and Main Points

BirdWatch Ireland is a member of SWAN, the Sustainable Water Network. We fully support all the points and recommendations made within the SWAN submission to the draft RBMP. BirdWatch Ireland is submitting additional points in this submission. We call on the Department of Housing, Community and Local Government to increase its ambition for Ireland's water bodies by defining concrete and measurable additional actions for all sectors in order to achieve good ecological status.

Good water quality is a basic requirement for the health of people and the environment we live in. It is also essential for the effective functioning of a wide variety of habitats and species. Many businesses depend on good water quality for their manufacturing processes. Tourism is highly dependent on a clean, green image with some sectors directly depending on good ecological water quality e.g. angling, water sports etc. Agriculture too needs good water quality to produce safe food.

On this basis, and following on from the review of the draft River Basin Management Plan which shows that one third of Ireland's water bodies are at risk and another third still under review, it is alarming to see the low level of ambition within the draft RBMP and we are concerned that not enough is being done to bring our waterbodies up to good ecological status.

BirdWatch Ireland is concerned that dRBMP may not be in compliance with the requirements of the Water Framework Directive since there is no justification for why 88% of unhealthy waterbodies will not be restored by the **obligatory deadline of 2021**.

## Main Points

1. BirdWatch Ireland is alarmed at the low level of ambition within the draft River Basin Management Plan. The ambition needs to be raised.
2. The Natura Impact Statement cannot come to the conclusion that there will be no significant adverse impact on species and habitats since the mitigation measures are firstly in draft form yet to be discussed and decided and some are based on voluntary initiatives with no defined outcomes. The NIS is flawed and the conclusion cannot be relied upon.
3. The dRBMP fails to link the water-dependent species of SPAs protected by the Habitats Directive and the objectives of the Water Framework Directive. Indeed the draft plan does not give BirdWatch Ireland any confidence that there will be improvements in the conservation status of the habitats of water-dependent birds or on the populations of some species in particular which are declining.
4. Agriculture is the most significant pressure on the majority of river and lake waterbodies and the most significant pressure on protected water-dependent protected habitats and species, however, the measures proposed to address this pressure are insufficient in our view to achieve good ecological status.
5. We are very concerned that there is no reference to cross border cooperation or measures to improve water quality in shared water bodies considering Ireland shares its river basin district border with Northern Ireland. In the context of Brexit, it is essential that this subject receives focus.

## Detail

### Review of dRBMP

BirdWatch Ireland is very concerned at the low level of ambition within the draft River Basin Management Plan (dRBMP) especially since the status of our waterbodies shows that 1,517 (32 %) are *At Risk* of not meeting their environmental objective of good or high status and 1,313 (27%) are currently under *Review*. Plans to restore just 12% of waterbodies is inadequate and not in line with the goals of the Water Framework Directive. The dRBMP is relying on existing measures to be undertaken within sectors to address sectoral pressures with few additional measures to boost ambition and this is very disappointing.

The establishment of the EPA Catchment Science and Management Unit, the establishment of the Local Authority Community & Waters Office (LAWCO) which is focusing on community engagement and the more integrated governance arrangements of the regional committees and a National Coordination & Management Committee are positive steps. However, these new bodies have yet to be tested in terms of delivery of the objectives of (although the effectiveness of these to deliver and implement robust measures has yet to be demonstrated). These do not compensate however for the lack of ambition that is in the plan which is most unfortunate.

- It will be very important that the overall objectives of the Water Framework Directive to achieve good ecological status for Ireland's water bodies must be filtered through the new structures being put in place. It is imperative that the new LAWCO structure, regional committees and the National Coordination committee find ways to communicate the goals and requirements of the WFD in a way appropriate for the general public that has real, tangible impact.
- BirdWatch Ireland is also concerned that in the coastal zone there are several bodies in charge of water quality protection, licensing etc and implementation here at the local level through the local and regional structures may encounter difficulties. As the dRBMP states, 63% of our transitional waters are failing to meet good ecological status which must be addressed.
- In addition, BirdWatch Ireland seeks assurance from the DCHLG that the focus for the LAWCO officers and associated structure is not just on rivers, but also on lakes, fens and wetlands including RAMSAR sites.

### Review of the Natura Impact Statement (NIS).

The goals of the NIS were to determine if there would be significant adverse impacts on protected habitats and species if the dRBMP does not achieve its goals. This would occur if the proposed measures in the dRBMP were not effective or if they are not undertaken correctly and examines potential impacts of proposed development of a measure (i.e. construction impacts of a urban waste water treatment plan). The NIS states "A second, and more significant direct effect of the Draft RBMP relates to whether it will be successful or unsuccessful in achieving its objectives, using the newly adopted catchment based approach and utilising a coordinated approach from stakeholders across the water sector. Failure of the RBMP to achieve its objectives and level of ambition, specifically its prioritised objective for the 2018 – 2021 cycle of meeting specific water related objectives for protected areas, will have a significant direct effect for water dependent habitat and species under the Habitats and Birds Directives and their future prospects."

The NIS then goes on to assess the direct, indirect and incombination impacts and to suggest mitigation measures to reinforce the robustness of the dRBMP measures in order to come to the conclusion that there will be no significant impact on protected habitats and species.

Table 7.1 in the NIS lists a suite of mitigation measures yet none of these have been tested nor are they evidenced based and it is questionable whether there is either a mechanism or a desire to undertake these measures since the NIS states that further consultation is required to agree final measures.

The following is a few examples of where there are issues with mitigation measures. The mitigation measure of the Knowledge Transfer Groups has been proposed to help ensure that there is no significant adverse impacts on relevant EU protected habitats and species yet the DAFM information leaflet in relation to the Knowledge Transfer Groups for the dairy sector does not mention water, nor does it mention Natura sites or even the environment. [See link here to the leaflet](#)<sup>1</sup>. The DAFM programme for KTGs in the dairy sector includes one mention of water and one mention of the environment though neither are part of the main programme for discussion in the KTG. The main items to discuss are: Animal Health & Management, Profitability & Financial Management, Grassland Management Plan, Farm Health & Safety, Farm Progression, CellCheck Farmer Workshop, Carbon Navigator, and Breeding Plans. It is also important to **state that membership of the KTGs are voluntary** though once a farmer is on board there may be an inspection. The farmers who enrol in the KTGs must produce a Farm Improvement Plan but the official DAFM Terms and Conditions for the Dairy KTG does not include water quality actions or nutrient management actions as part of this.

Similarly the Sustainable Dairy Scheme is listed as a mitigation measure yet a farmer does not need to pass the sustainability criteria(which includes measures on water but mainly focusing on conservation) within this scheme in order to pass the Sustainability audit. The Bord Bia information on line states: “The information collected for sustainability purposes does not receive a score and does not affect whether or not the farm passes the audit. There are 170 auditable requirements in the standard. Of these 7 are critical and must be correct. Of the remaining 163 general requirements the auditor can give the following scores. **The 7 critical criteria do not relate to the environment or water quality but rather relate to animal hygiene and food safety and traceability.**”

This shows that the authors of this work perhaps did not look into these schemes in detail as there is nothing substantive in these examples which could give any confidence in preventing further deterioration of Ireland’s waterbodies not to mention achieving good ecological status since participation in the schemes is voluntary and there is no obvious penalty for non-compliance. **It is not possible for the authors of the NIS to conclude that these measures will have a broadly positive impact on water quality when it is based on an inadequate presentation of the detail of the schemes.**

The stand out feature of the NIS is that it states: “To further improve actions contained within the Draft RBMP and to address potential negative effects identified in this NIS, mitigation measures have been proposed...” and that these mitigation measures “are currently under consideration and may require further consultation between DHPCLG and other stakeholders. The outcome of this consultation will be recorded along with the Final RBMP.” Since some of these measures are under consideration and may not have political or financial underpinning the mitigation measures cannot support the NIS conclusion that there will be no significant adverse impacts on relevant EU-protected habitats and species of the dRBMP not meeting its goals. Some of the measures in themselves are voluntary in nature and depend on public participation. Definitive, measurable actions are required. Tenuous and voluntary actions do not provide the strong underpinning that a NIS conclusion requires, i.e. without lacunae and without doubt. The dRBMP NIS conclusion is not reliable and put the dRBMP of being potentially **in breach of Article 6 of the Habitats Directive as it stands**. It is alarming that the NIS, which is supposed to be definitive and is being presented for

<sup>1</sup> Knowledge Transfer Dairy Programme leaflet 2016

<https://www.agriculture.gov.ie/media/migration/farmingschemesandpayments/knowledgetransfer/DairyInformationLeaflet240616.pdf>

public consultation, could be changed sometime in the future. This also undermines BirdWatch Ireland's confidence in this process.

The AA and SEA processes inform the production of dRBMP but it still some of the measures within the NIS are not mentioned within the dRBMP. If they are truly mitigation measures they should have been fully incorporated in to the dRBMP to be able to stand over the NIS conclusion and this should be obvious to the reader. For instance there are several mentions within the NIS and the Environmental Report that a list of water dependent birds be drawn up by BirdWatch Ireland and the EPA but this measure is not reflected as an action of the RBMP. How would such an action be given mandate if it is not specifically targeted for action.

Finally, to aid in transparency and readability a list of the mitigation measures outlined within both the NIS (where they are definitive) and in the Environmental Report of the SEA should be created as and integrated within the dRBMP so that the reader can see those linkages.

### **The WFD and Water-dependent Habitats and Species**

BirdWatch Ireland's submission on the Significant Water Matters document highlighted the important link between the Water Framework Directive and the Birds and Habitats Directives and the requirement.

In the section of the dRBMP which describes the Irish River Basin District, it states:

"Within the RBD there are 134 designated bathing waters, 64 shellfish waters, 42 nutrient sensitive areas, 358 special areas of conservation (SACs) with water dependency and 154 special protection areas (SPAs). The SACs are quite geographically concentrated, in particular along the western seaboard. Related to this the water bodies which are at, or are required to be at, high status are similarly concentrated – with a significant overlap between high status waters and the SACs with water dependency. The SPAs are somewhat more dispersed, but again with particular concentrations along the western seaboard."

After this point there is no reference to SPAs as being associated with water-dependent habitats and species. BirdWatch Ireland is alarmed at this omission. Most of Ireland's SPAs are water based with many associated with transitional waters which have poor status. The species listed as the Conservation Interests of these sites are birds many of whom are migratory depending on these sites for foraging, over wintering and breeding. BirdWatch Ireland is extremely concerned that there is no reference to aligning the Water Framework Directive objectives with those of the conservation objectives of these SPAs. Many of these sites are also Ramsar wetland sites and again there is scant reference to these wetlands in this site. The report alludes to SPAs being congregated on the west coast but this is untrue and also omits to consider the river SPAs designated for Kingfisher. Kingfishers forage on small fish in rivers. It is an Annex 1 species and requires special consideration wherever it is found, even in waterbodies that are not designated for it. The European Court of Justice found Ireland guilty of failing to protect birds in the wider countryside (ie. Outside of SPAs) in ECJ C418-04). The linkages between the protected species of SPAs needs to be made within the dRBMP, otherwise the plan will be incomplete and potentially in breach of the requirements of the Water Framework Directive.

In addition, the NIS states that there is no list of water-dependent birds in Ireland and suggests that BirdWatch Ireland and the EPA should draft such a list. BirdWatch Ireland would be happy to progress such an action but as a starting point the Species of Conservation Interest in the SPAs should have been reviewed. Other species could be incorporated into a list following dedicated review.

Because a water body, or a portion of water body, will be the source for water-dependent habitat or species in a Natura 2000 site, objectives within the Birds and Habitats Directives and the WFD must ensure that there is no deterioration in Favourable Conservation Status (FCS) (EC 2011). In fact, efforts in planning for our water infrastructure should aim to achieve FCS for water-dependent habitats and species. Protected areas can have stricter water quality status standards; they must, without exception, achieve standards relevant to their designation which may be stricter, in some aspects, than good or high status.

Significant efforts should be made to ensure that implementation of the WFD is in line with the requirements of the Habitats Directive as it relates to protected water-dependent habitats and species. Both the Birds and Habitats Directives and the WFD aim to ensure healthy aquatic ecosystems while at the same time ensuring a balance between water/nature protection and the sustainable use of nature's natural resources<sup>2</sup> (EC 2011). Annex-listed habitats and species are vulnerable to both hydrological and water quality pressures, and pose particular challenges in the implementation of the WFD<sup>3</sup>.

The main linkages between the Habitats Directive and WFD:

- The WFD does not change what Member States must achieve for the Habitats Directive, but it provides a joint framework for the implementation of measures needed by both WFD and the Birds and Habitats Directives in water-dependent Natura 2000 sites (EC 2011)
- **There is a need to identify the water related requirements to achieve FCS of habitats and species dependent on water (EC 2011 p. 9). Article 1 (a) of the WFD clearly mentions the protection and enhancement of the status of aquatic ecosystems and with regard to their water needs, also the protection of terrestrial ecosystems and wetlands directly depending on them.**
- Requirement for identifying and including Natura 2000 sites with water-dependent habitats and species in a Register of Protected Sites which the Environmental Protection Agency in Ireland. Protected areas that have been designated only for national purposes can be included in the register in order to ensure that the water-relevant objectives of the WFD are contributing to the protection of species and habitats.
- The measures serving the Habitats Directive and WFD objectives need to be included in the RBMPs required under Art. 13 of the WFD and should also be included in the management plans of the Natura 2000 sites.

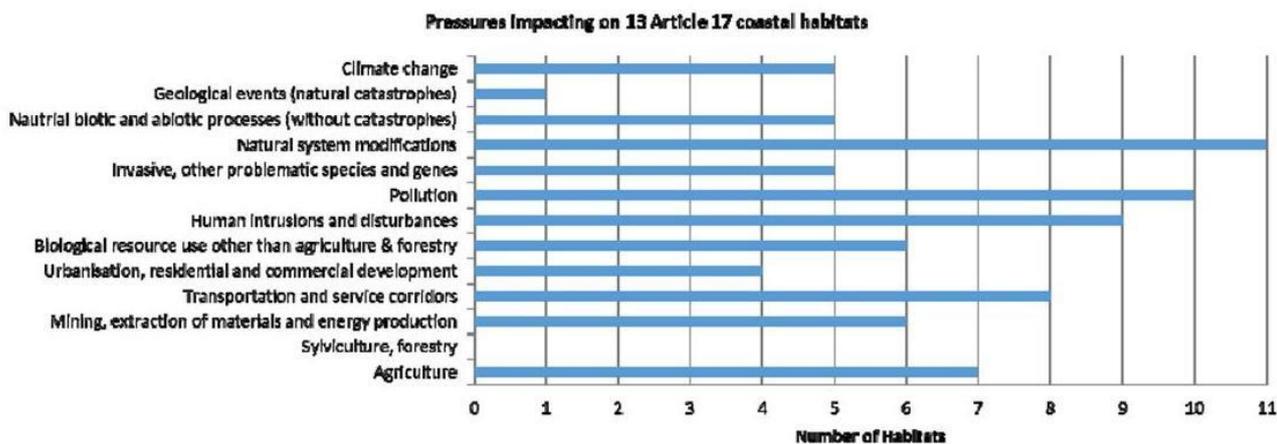
Please see the tables below extracted from the latest Article 17 report published by the NPWS in 2013 and the status of water-related habitats and pressures on those habitats. Considering that only 8% of our habitats are at FCS, it is imperative that actions coming out of implementation of the WFD also ensure that water-dependent habitats and species ensure that FCS is achieved. Please refer to the Article 17 report<sup>4</sup> for a full description of the status and pressures on habitats and species.

### Table 1. Pressures on coastal habitats

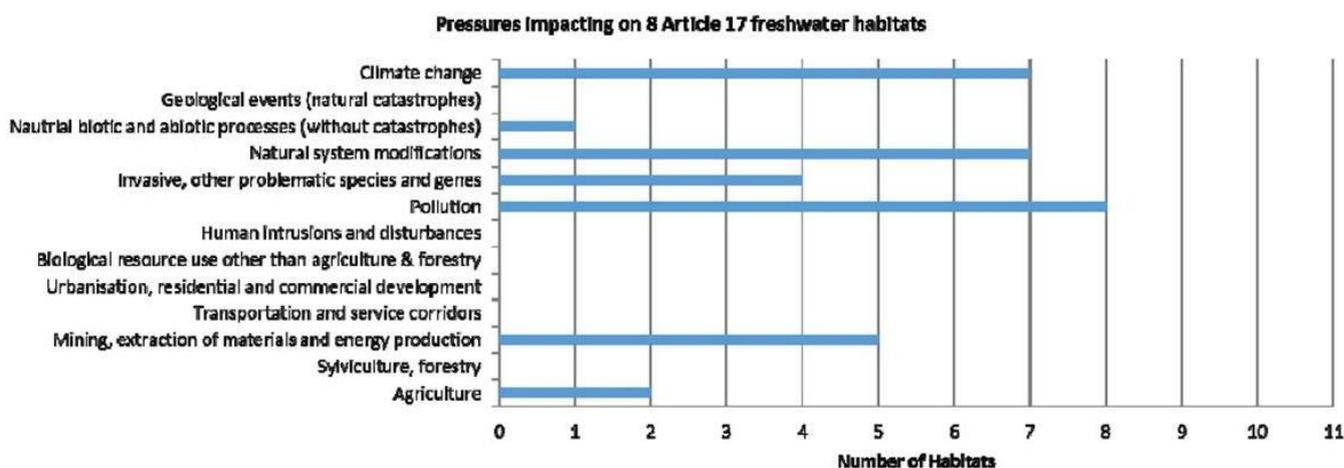
<sup>2</sup> European Commission (2011), Links between the Water Framework Directive (WFD 2000/60/EC) and Nature Directives (Birds Directive 2009/147/EC and Habitats Directive 92/43/EEC) Frequently Asked Questions, European Commission, Brussels.

<sup>3</sup> Mayes, E., & Codling, I., (2009) Water Framework Directive and related monitoring programmes. *Biology and Environment: Proceedings of the Royal Irish Academy* 109B, 321–44.

<sup>4</sup> NPWS (2013). The Status of Protected EU Habitats and Species in Ireland. Overview Volume 1. Unpublished Report, National Parks & Wildlife Services. <http://www.npws.ie/article-17-reports-0/article-17-reports-2013>



**Table 2: Pressures on freshwater habitats**



**Pressures Impacting on 8 Article 17 dune habitats**

**Status of water-dependent birds**

Many of our breeding waders which depend on wetland habitats for breeding are on the brink of extinction in Ireland. Habitat loss is one of the main reasons for this decline.

**Table 3: Status of breeding waders in Ireland (Bird Atlas 2007-2011<sup>5</sup>)**

<sup>5</sup>National Biodiversity Data Centre: Bird Atlas 2007-2011.

## Status and declines

Species	Conservation status	% Change	
		1970-2010	1990-2010
Curlew	IUCN /Irl Red	-78	-73
Dunlin	Annex 1, Irl Red	-69	-71
Golden Plover	Annex 1, Irl Red	-50	-42
Redshank	Irl Red, SPEC 2	-55	-47
Lapwing	Irl Red, SPEC 2	-53	-33
Snipe	Irl Amb, SPEC 3	-34	-8

Most of Ireland's water-dependent habitats, species including birds are in a dire situation. The Curlew, as a breeding bird, is on the brink of extinction in Ireland due to habitat loss. Curlew nests in wet grasslands and in peatlands including raised bogs and upland blanket bog. The other breeding waders in Table 3 above are also faring badly in Ireland due to habitat loss. However, BirdWATCH Ireland sees no reason to be confident that the proposed RBMP will do anything to help the status of these and other species.

The European Commission guidance document on the overlap, complementarity and implementation of the requirements of the two directives includes the following:

- The objectives in the Birds and Habitats Directives are listed for species and habitats whereas in the WFD they are specified for the water bodies. According to WFD Article 4.1.(c) the WFD objective of good status may **need to be complemented by additional objectives in order to ensure that conservation objectives for protected areas are achieved. Art. 4.2. WFD says that "where more than one of the objectives ... relates to a given body of water, the most stringent shall apply"** (EC 2011 p. 10).
  - *This level of detail is not evident within the dRBMP and this is a significant omission.*
- For the purpose of returning water dependent Natura 2000 sites to FCS it is widely acknowledged that environmental quality standards (e.g. physico-chemical or hydro-morphological conditions) should be established. **These standards should be sufficiently stringent to support FCS.** In this way measures can be focussed on achieving the environmental quality standards with the aim of achieving FCS (DEHLG 2008).
  - *This level of detail is not evident within the dRBMP and this is a significant omission.*
- In Ireland where a water dependent Natura 2000 site has more stringent environmental quality standards prescribed separately in National legislation than any surface water body associated with it, shall be classified as being at less than good status if these more stringent objectives are not also met. **To be classified as good status or better the water body must achieve both the relevant standards/objectives for the surface water body in question and the relevant protected area objectives and standards** (DEHLG 2008).
  - *This level of detail is not evident within the dRBMP and this is a significant omission.*
- The programme of measures must include **any measures necessary to achieve compliance with standards and objectives for Natura 2000 sites** listed in the register of protected areas as far as their ecological status is concerned. Measures needed under the Birds and Habitats Directives can be included either directly into the RBMPs or as a reference to the relevant Natura 2000 management plan or other conservation instruments containing Natura 2000 related conservation measures. In any case, the Programme of Measures must take into

account the provisions of Art. 12 of the Habitats Directive on the strict protection of animal and plant species of Community Interest listed in Annex IV HD. It must be kept in mind that such measures may also apply outside a SCI.

- *This level of detail is not evident within the dRBMP and this is a significant omission.*
- Coordination of measures for water-dependent habitats and species under the Birds and Habitats Directives and water bodies in the WFD should be ensured in the RBMP.
  - *There is insufficient coordination of measures in the dRBMP and this is a significant omission.*
- While both the Birds and Habitats Directives and the WFD require surveillance and monitoring respectively, and include different parameters, wherever possible joint monitoring should be arranged
  - *This level of detail is not evident within the dRBMP and this is a significant omission.*
- In terms of public participation, measures for water-dependent habitats and species should be discussed with relevant stakeholders
  - *We are unaware of any level of direct discussion on this topic.*

### **Natural Systems Modifications**

In Tables 1 and 2 above, natural systems modifications is the highest pressure on coastal water bodies and the joint second highest pressure on freshwater according to the Article 17 report of 2013 yet there is very little effort in the dRBMP to assess or address this issue. This is a significant failing and of very serious concern to BirdWatch Ireland considering that most of Ireland's SPA home to thousands of birds are using these coastal and freshwater sites, especially in winter time. This is a failure to help meet the conservation objective of these sites.

### **Brexit and the dRBMP**

In the previous river basin planning cycle, Ireland co-operated with Northern Ireland on the three shared international river basin districts. The shared water bodies have not disappeared in the reality though there is no mention of the potential for transboundary pollution, transboundary efforts for improving water quality or community cooperation. This is a serious cause for concern. Water does not know what borders are. The Joint Submission by the Northern Ireland Environment Link and the Environmental Pillar to the Joint Committee on the Implementation of the Good Friday Agreement (June 2017) on the subject of Brexit states: "Improved implementation and on-going co-operation with the Republic of Ireland in the management of river basins will be vital post Brexit to protect and improve individual water bodies for the next three river basin planning cycles to 2015, 2021 and 2027." In addition, no co-operation is mentioned on addressing issues relating to the crossborder transitional and marine sites shared with Northern Ireland. It is extraordinary that there is no mention of cross-border cooperation in the dRBMP. While there is discussion of the cooperation required between the Republic and Northern Ireland in the SEA it is lacking in detail in terms of operation (for instance what is the relationship with the LAWCO officers and cooperation on shared water bodies with Northern Ireland), there should be a section on this cooperation and measures to address common issues within the dRBMP. This needs to be revisited.

### **Agriculture**

BirdWatch Ireland is very concerned that agriculture as the largest pressure on Ireland's water bodies does not receive a stand alone chapter to deal with the seriousness of this issue. In addition, we are concerned with low inspection farm inspection rates and is of the view that a coordinated

catchment based approach with targeted measures is essential to reduce the impact of agriculture. We see no assurance within the draft RBMP that this pressure will be reduced.

In relation to additional measures to help with reduce the impact of agriculture on water quality, the proposal to assign the National Sustainable Dairy Forum as a body to help solve the water quality issues with agriculture is a cause for concern. The state should be responsible for regulating water quality and achieving compliance and not private industry. If agriculture wishes to go above and beyond basic compliance then that is to be celebrated but that is not clear if it is basic compliance that is being supported with this measure or increased ambition since there is no clear plan on what the goals of the Forum are for water quality, or how it is going to achieve its goals.

It is proposed that measures developed by the Forum will be incorporated into Origin Green. Origin Green relies solely on voluntary action of farmers. For example, none of the current Origin Green measures such as the Carbon Navigator are obligatory. Suggested actions resulting from greenhouse gas emissions assessment are just suggestions. It is worrying that these additional measures purported to reduce the significant pressure from agriculture could operate on a voluntary basis only.

### **Upland Burning and Impacts on Water Quality**

An emerging issue which needs a measure to address it in the final Plan is the impact of upland burning on water resources. Illegal and prescribed burning in the mountainous and hilly areas of the uplands has been increasing over the last 15 years, with severe fires in 2017. There is no register of the number of fires that occur each year, their location or the amount and type of habitat burnt or the intensity of the burn. The EPA (2015)<sup>89</sup> has stated that *'the burning of biomass is a threat to (air) and water quality through the generation of pollutants including Polycyclic Aromatic Hydrocarbons (PAHs)'*.

Other impacts on water and hydrology have been documented in a UK research report from the University of Leeds <sup>40</sup> looking at the effects of moorland burning on the ecohydrology of river basins, which has shown that burning on peatlands has *'clear effects on peat hydrology, peat chemistry and physical properties, river water chemistry and river biota.'* It also found:

- Rivers draining burned catchments were characterised by lower calcium concentrations and lower pH relative to rivers draining unburned catchments. Rivers draining burned sites had higher concentrations of silica, manganese, iron and aluminium compared to unburned catchments.
- Burning vegetation alters the natural peat hydrology in the upper layers of the peat affecting the balance of where water flow occurs.
- Macroinvertebrate population diversity was reduced in burned sites where populations were dominated by groups that are commonly found in higher abundance in disturbed river systems, such as (Chironomidae and Nemouridae).
- Particulate organic matter (predominantly peat) deposits were increased up to four-fold in the bed sediments of burned rivers compared to unburned rivers. Whilst this research is from the UK, the findings are cause for some concern in Ireland given the prevalence in some areas of widespread upland burning.

To respond to this threat of water quality impacts from upland burning, the draft Plan should highlight the fact that there is a water quality consequence to burning and collaborate with DAFM and other relevant agencies to challenge the prevalence of upland burning in order to develop coordinated actions to tackle this growing problem, as part of the new integrated approach to WFD implementation. Research into the impacts of burning on water quality would also be beneficial, although should not delay taking urgent action on this issue.

### **Review of SEA Environmental Report:**

- Section 4.3.8 is incomplete and needs to be rewritten to include the variety of Species Action Plans developed by the NPWS, BirdWatch Ireland's Group Species Action Plans for Birds and more
- Section 5: There is no mention, or assessment, of Special Protection Areas for birds within the Biodiversity, Flora and Fauna section and this is a serious omission. SPAs are listed in the map provided of designated sites and in the glossary but there is no other mention. Most of Ireland's SPAs are on the coast and 70% of transitional waters have poor ecological status. Several other SPAs are associated with wetlands and again, this water-dependent sites are not mentioned. This section needs to be rewritten.
- There is also no mention of the status of birds in Ireland to be found in Ireland's Article 12 report to the European Commission and in the Birds of Conservation Concern in Ireland report produced by BirdWatch Ireland. This errors need to be fixed.
- Section 5: There is no mention of Annex 1 bird species (Kingfisher, White-fronted Goose, Bewick's Swan, Whooper Swan, Little Egret and several more) which may be reliant on waterbodies outside of SPAs. This is a serious omission.
- Page 65 *BirdWatch Ireland is the BirdLife partner, and is responsible for promoting and updating the status of Ireland's birds and their key sites.* This is not true. It is the job of the National Parks and Wildlife Service to update the status of Ireland's birds especially under EU reporting mechanisms. BirdWatch Ireland has been in the past involved with the related survey work. BirdWatch Ireland takes on the role to promote Ireland's birds and key sites but it is not exactly our responsibility. It is the responsibility of the Department of Culture, Heritage and the Gaeltacht to promote Ireland's natural heritage.

In conclusion, there are significant additional work to be undertaken for the dRBMP to do what is needed for our waterbodies at risk in Ireland and to help water-dependent habitats and species and to meet the requirements of both the Water Framework Directive and the Habitats Directive.

ENDS

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