

# Response to Public Consultation River Basin Management Plan

## Submission to DHPLG by Celebrate Water

31st August 2017

### Contact Details:

Celebrate Water, Ballybrack, Merville, Co. Donegal. Mobile: 087 647 8183

Please find below comments in relation to the call for public submissions on the draft RBMP for Ireland (2018 - 2021).

Celebrate Water welcomes the opportunity to respond to the RBMP for 2018-2021. In particular we commend the excellent work by the EPA Catchment Science and Management Unit in developing clear monitoring techniques and establishing baseline data on our river basins. In addition we also commend the establishment of the National Water Forum and the Waters & Communities Office (LAWCO) with the provision of Community Water Office working at grassroots level. Empowering communities to actively engage in water resource management requires a significant change in our relationships with water itself and between all the stakeholders.

However we have serious concerns about the level of ambition of the overall plan and feel there is a high risk of this plan failing to meet WFD objectives effectively. In particular we have concerns over the low number of water bodies that are earmarked for restoration (~12-14%) and the lack of proposed measures to address the changing pressures on our environment e.g. climate change.

In summary we would like to comment on the following items raised in the RBMP:

### **Agricultural pressures**

It is clear that an urgent review of the agricultural measures proposed is needed. In particular the continued use of the current Nitrates Regulations is insufficient as it has not resulted in any improvement over the last cycle and with the impending new agricultural programmes rolling out, this is likely to worsen. Enforcement in this regard is weak as well as programmes to increase public awareness. Caring for our soil is imperative moving forward. Supporting the farming community to develop practices that are in balance with a changing environment is critical. A clear and consistent approach to long term farm management advice is currently lacking, with farmers frustrated by changes in regulations imposed on a frequent basis.

## **Coastal Pressures**

Coastal and transitional measures are very poorly covered under the plan and it is clear collaborative stakeholder engagement is insufficient in this regard. We have a particular concern with regard to aquaculture in Inishowen and the lack of regulation. An additional section on this water body type is needed.

## **Waste Water Discharge**

Measures to improve discharge facilities are welcomed and must be achieved as quickly as possible by providing additional resources to effected areas.

## **Uplands management**

Concerns for the management of upland areas in terms of peat extraction methods, dumping, removal of hedgerows, overgrazing and how this impacts on our rivers and lakes with increased sediment, leachate, erosion and loss of ability to absorb water and CO<sub>2</sub>. This ties in with flood management and a clear programme of collaboration with the OPW and LA planners is imperative.

## **Invasive Species**

A programme to increase awareness and control is welcomed. The engagement of local community groups is essential in this regard and should be supported financially and with expert guidance at community level.

## **Forestry Management**

Highlighted as a source of significant sedimentation and nutrient run-off, measures to improve forestry practices must be implemented immediately. Use of natural woodland should be encouraged.

In recent weeks Inishowen has been hit by a significant flooding event which has caused havoc for our local environment and will have long term impacts. It is apparent from the flood damage that inappropriate management of our rivers and floodplains has facilitated more severe impacts and left a trail of destruction across counties Donegal and Derry. Water has had it's say and we really need to sit up and listen.

---

### ***About Celebrate Water - Connecting People, Place and Nature***

*Celebrate Water is a community group that aims to raise awareness of environmental issues in an educational, creative and fun way. Since 2011 Celebrate Water have provided a wide range of activities to*

*Inishowen communities that are family friendly and free of charge. These events have ranged from education and training, art, music and creativity, biodiversity and heritage and waste awareness solutions. All the events have the common themes of increasing our awareness of our environment and how we can protect it - particularly in relation to marine and freshwater - and providing opportunities for more collaborative and creative community engagement. Celebrate Water is a member of SWAN and fully supports SWAN's response to the RBMP.*