



The Heritage Council

Seeking your views on Water Quality

Report on Feedback
March 2004

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THE
HERITAGE
COUNCIL



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Seeking your views on Water Quality

REPORT ON FEEDBACK MARCH 2004

compiled by

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FOREWORD

Background

The Heritage Council is a statutory body with responsibility for proposing policies to protect, preserve, promote and enhance the nation's heritage, whether built, cultural or natural.

In its strategic plan 2001-06, the Council identified water quality as one of its main areas of policy formation. As part of the process of drafting this policy, the Heritage Council identified the implementation of the EU Water Framework Directive as a major work area with particular emphasis on the public participation aspects. To assist in developing policy, the Heritage Council agreed to canvass opinion on current water quality and current and future water management proposals.

A two stage process of consultation was agreed on, seeking views on these issues. This took the form of written consultation and a discussion seminar, which was held in Athlone on October 18 2003. The outcomes of both these elements of the public consultation are set out in this document.

A written consultation process was started in March 2003 with the distribution of a consultative document, *Seeking Your Views on Water Quality*. The responses were collated and analysed by Dr Harriet Emerson, who also co-ordinated the workshop sessions at the seminar.

Content of the document

This document is a record of the feedback to the consultation document and the seminar of 18 October 2003 and represents the views of the respondents expressed in writing or during the workshop and plenary sessions.

Chapters 3 and 4 cover the respondent rate, and data analysis. Chapter 5 contains an over-view on a question by question basis. Chapter 6 examines the response to the principles contained in the Water Framework Directive. Chapter 7 looks at proposals made by respondents under a series of headings: administrative arrangements, enforcement and compliance, public participation, and recovery of costs. Chapter 8 gives a detailed summary of responses by respondent type, of which there are 12.

A report on the Athlone seminar is contained in chapter 9. The programme for the day is outlined; short presentations were made but the bulk of the day was made up from workshops and a plenary session. This chapter is devoted to the workshop discussions and plenary, both of which were informed by the written consultation process.

Chapter 10 identifies a number of challenges arising out of the written and discussion stages.

Future Actions

Based on the deliberations of the issues arising from both parts of the consultation process, the Heritage Council will draw up its own recommendations for government and other statutory bodies on the implementation of the Water Framework Directive, and water management in Ireland, and will pursue these policy issues with these bodies.

The record of this consultation process will be distributed to all those who took part in the process, and any other interested parties. The document will be a resource to any individuals, communities or organisations which are interested in this work.

INTRODUCTION

1.1 The EU Water Framework Directive

The Water Framework Directive of the European Union (Directive 2000/60/EC) aims to introduce innovative measures to conserve and protect water resources. It is intended to provide a mechanism for dealing with both water quality and quantity. Its principal innovation is the requirement that water be managed in an integrated way.

The Directive aims to contribute to:

- the provision of the sufficient supply of good quality surface water and ground water i.e. underground water) as needed for sustainable, balanced and equitable water use;
- a significant reduction in pollution of ground water;
- the protection of territorial and marine waters, and;
- achieving the objectives of relevant international agreements. [Article 1]

It supports three significant principles.

The principle of precautionary action, where there are threats of serious or irreversible damage, lack of full scientific certainty should not be used as a reason for postponing cost-effective measures to prevent degradation of the environment.

The polluter pays principle, where those who cause pollution should pay for its effects, both by finding ways to avoid further pollution and by covering the costs of restoration.

The principle of the recovery of costs of water services, which requires member states to use water-pricing policies that "provide adequate incentives for users to use water resources efficiently".

The implementation of the Directive is based on the idea of catchment management. A catchment is the area of land from which water flows into rivers and lakes (or directly into the sea). Within the catchment, all of the waters (including ground water and artificial water bodies like reservoirs and canals) have to be managed in a balanced way. The key is getting all water users and interested parties – the stakeholders – involved. Several recent projects have already been run on this basis, for example on Lough Leane, Lough Derg and Lough Ree and the Rivers Erne, Suir, Liffey and Boyne.

Catchments are to be identified throughout the island and several catchments will be grouped together in River Basin Districts (RBDs). A River Basin Management Plan is to be produced for each River Basin District. Some RBDs will span the border with Northern Ireland: the aim will be to produce a single, agreed plan for each of these International River Basin Districts (IRBDs).

The Water Framework Directive sets out a clear timetable through which the aims of the Directive are to be achieved in all EU countries (see Table 2).

Step 1	By end of 2003	Transpose into national law Identify River Basin Districts and competent authorities
Step 2	By end of 2004	Characterise river basins Identify locations and boundaries of water bodies. Identify pressures and impacts; conduct economic analysis of water use Define reference conditions for good water status Assess the likelihood that surface water bodies will fail to meet the environment quality objectives Register protected areas
Step 3	By end of 2006	Water monitoring programmes become operational Work programmes and timetables of River Basin Management Plans (RBMPs) to be made public; six months for consultation
Step 4	2007	Public consultation on significant water management issues
Step 5	2008	Draft RBMP to be made public; six months for consultation
Step 6	2009	Programme of measures for achieving the environmental objectives to be identified. RBMPs to be agreed and sent to the EU Commission
Step 7	2012	Programmes of measures implemented
Step 8	2015	Good water status to be achieved for all surface waters, artificial and heavily modified waters and ground water Review and update
Step 9	2027	Final deadline for achieving objectives, following two 6-year prolongations

Table 2. WFD Implementation Timetable

1.2 Implementation of the Water Framework Directive in Ireland

It is proposed to have four districts in the Republic, and three IRBDs. The boundaries of all the districts will be finalised by the end of 2003. A district may include one or more river mouths, estuaries or deltas; it also includes coastal waters at least one mile from shore, recognising that land-based activities have a significant impact at sea..

Local Authorities will have the primary role in promoting, establishing and implementing these new arrangements.

1.3 Public participation in implementation of the Water Framework Directive

The Water Framework Directive encourages the active involvement of all interested parties in implementation, and especially in the production, review and updating of the River Basin Management Plans.

There may be three levels of public participation:

- information: the authorities are required to keep the public informed
- consultation: they are also required to seek comments on plans and proposals
- involvement: they are encouraged (not required) to involve stakeholders in decision-making

The details of the public participation proposed in the Water Framework Directive are presented in Article 14 of the Directive. The full text of the Water Framework Directive is available on the website www.wfdireland.ie

2.0 BACKGROUND TO THE HERITAGE COUNCIL CONSULTATION

The Heritage Council is a statutory body with responsibility for proposing policies that will protect, preserve and enhance the nation's heritage, whether built, cultural or natural. In addition to the present generation's own use and enjoyment of these resources, the Council's work aims to ensure that future generations will be able to inherit these resources in good condition. Water is one of the most important of these resources and it is an integral part of the nation's natural and cultural heritage.

In its strategic plan 2001-06, the Council identified water quality as one of its main areas of policy formation. As part of the process of drafting this policy, the Heritage Council resolved to make recommendations to the government about the implementation of the Water Framework Directive, and about other measures that it believes are necessary to improve and conserve water supplies and to manage human activities that affect the nation's water resources.

To assist in developing policy, the Heritage Council agreed to canvass opinion on current water quality and current and future water management proposals.

2.1 Establishment of Working Group on the Water Framework Directive

The Heritage Council established a Working Group on the Water Framework Directive under the aegis of its Standing Committee on Inland Waterways, with the purpose of aiding the Council in its formation of policy on water quality. The Working Group decided to focus in particular on the public participation rather than on the technical aspects of the Directive.

2.2 Consultation Exercise

In drawing up its recommendations, the Working Group wished to consider both expert opinion and to gather views from around the country on a number of matters:

- the current state of our waters;
- the principles underlying the Water Framework Directive;
- its practical implementation;
- what else needs to be done.

The Working Group agreed a consultation exercise to gather opinion from around the country, through a two-stage process:

1. Written Consultation

The written consultation stage was initiated using a consultative document (see Appendix X), which explained the aim of the Heritage Council, presented an

overview of current pressures on water resources, described the Water Framework Directive and listed some of the critical challenges. The document then presented nine broad questions through which readers' views were sought on:

- the current state of Ireland's waters;
- the principles underlying the Water Framework Directive;
- its practical implementation, and;
- what else needs to be done.

The document clearly explained that the feedback received would be used by the Heritage Council to help it draw up policy advice to the Minister for the Environment, Heritage and Local Government, and to draft guidance on public participation in implementing the Directive.

2. Discussion Seminar

In the consultative document, it was made clear that all those who responded would be invited to participate in a discussion seminar. This event was intended as an opportunity to present the feedback from the written consultation, and to further explore this and the issues raised by the Water Framework Directive.

The outcomes of both these elements of the public consultation are set out in this document.

3.0 QUESTIONNAIRE RESPONSES

Responses were received by the Heritage Council in the period to the 1st September, 2003, both by post, fax and electronically.

3.1 Response Rate

A total of 1131 copies of the consultative document were posted out to a very wide range of groups and individuals identified as having a potential interest in water quality and the implementation of the WFD (see Appendix A for list of recipient organisations). The document was also available via the Heritage Council website.

Recipients were initially asked to submit responses by the beginning of June. This date was extended to the 1st of September, to allow further questionnaires to be returned.

By the end of October 2003, a total of 147 replies had been received, of which 127 included completed questionnaires or letters of response to the consultative document. This amounted to a 11.2% response rate. (The remaining 20 replies were acknowledgements, notifications that the document had been forwarded to another party for response, or that the individual concerned would not be responding.)

Since the recipients were not chosen as a sample to be representative of any groups or the population as a whole, the response rate is in itself not significant. This is particularly the case given the qualitative analysis performed.

3.2 Respondents

Responses were assigned to the following categories:

	% recipients of document	Responses	% of responses
Agriculture	12.5	2	1.6
Angling	18.0	18	14.1
Business & related	4.0	6	4.7
Clergy	7.0	9	7.0
Community NGOs	4.0	3	2.3
Education	0.5	5	3.9
Environmental NGOs	3.5	15	11.7
Individuals	4.0	12	9.4
Local authorities	22.0	18	14.1
Other statutory agencies	15.0	23	18.0
Professional bodies	0.5	1	0.8
Recreational NGOs (excl. angling)	9.0	16	12.5
Total:	100.0	128	100.0

(Three responses in the *Other statutory agencies* and *Recreational NGOs* categories came from Northern Ireland or UK-based organisations.)

Table 1. Responses by area of interest

The distinction between Angling and other Recreational NGOs was made because of the significant numbers of angling responses and the need to be able to assess whether responses from angling groups are significantly different from other recreational interests. Similarly, while submitting their responses in a personal capacity, members of the clergy were considered separately from other individuals, primarily because of the potential significance of the organisations to which they belong, and again the need to distinguish whether their responses were distinctly different.

Many of those responding from local authorities did so in a personal capacity, but other than where they expressly requested that their input be considered as that of an individual member of the public (1 case), these responses have been taken as one category.

Where the proportion of responses in a category is markedly different than the proportion of consultation documents sent out (see Table 1), one may assume that those concerned were either relatively highly motivated to respond (as in the case of Education, Environmental NGOs, Individuals, Other Statutory Agencies, and Recreational NGOs), or alternatively were disinterested or unaware of the relevance of the issue to themselves (as with Agriculture, Community NGOs, and Local Authorities). There may be a number of reasons to explain these varied response rates, but without further investigation these must remain the subject of conjecture.

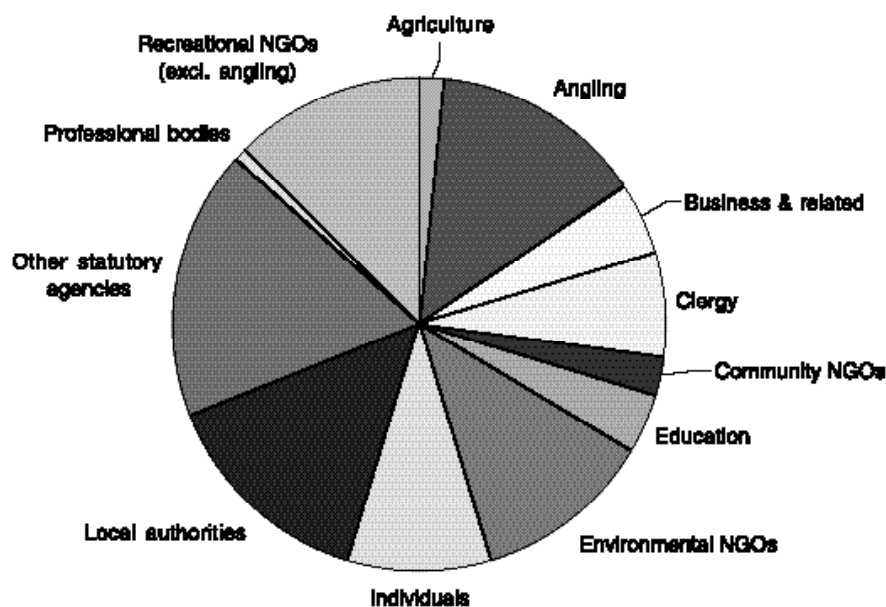


Fig. 1. Percentage of responses by area of interest

3.3 Conclusions

The response rate of 11.3% may be considered low. However, it should be noted that the consultative documents were sent out without prior introduction, and in the absence of any national initiative to heighten awareness of the Directive itself or water management issues. In such a case of 'cold calling' a relatively low response rate to a postal questionnaire would be anticipated.

The low overall number of responses may be seen to indicate a number of phenomena:

- It suggests a failure on the part of recipients and the public at large to perceive the relevance or potential impact of the Water Framework Directive to themselves and their interests.
- There is a general lack of familiarity amongst the public and many of the recipient groups at being consulted on matters of national policy (as opposed to more localised issues).
- It is possible that many community groups and NGOs would have difficulty establishing agreement on responses to be given to such consultative documents.

The sources of the responses received suggest a high level of awareness and motivation in relation to the Water Framework Directive among specific non-governmental groups, notably anglers and other recreational water users and environmental NGOs. A reasonably high response rate might have been anticipated from statutory authorities, especially those likely to be involved in implementation of the Directive. As a proportion of total responses, this was found to be the case. However, the response rate from this

sector was surprisingly low, and the reasons for this would be interesting to discover. One comment implied that the questionnaire appeared to be directed towards the individual (i.e. question 6 regarding the acceptability of increased costs for implementation). This may have confused statutory agencies about the capacity in which responses were to be made. This in turn may have resulted in lower response rates and the variable nature of response, on behalf of the agency or from staff as individuals.

4.0 DATA COMPILATION AND ANALYSIS

The information gathered via the open-ended questionnaire design required qualitative analysis. A limited amount of statistical data could be established in relation to the information received, but since the recipients of the consultation document were not chosen in a systematic manner, results cannot be considered representative of wider populations, or any grouping other than of those who responded.

4.1 Data compilation

Questionnaire responses were entered into an Excel Spreadsheet and The Ethnograph programme, which is designed to assist with coding and retrieval of qualitative information. Both only represent tools for assisting with the examination of the data, but helped to make it possible to establish the extent of themes which emerged and their relative significance.

4.2 Data Analysis and reporting

The returned questionnaires were classified as belonging to particular groups, which were not pre-determined, but correspond to the nature of the various respondents. This made it possible to examine the responses of distinct interest groups, in order to determine similarities and differences within and between them.

Responses were considered to each of the questions asked in turn, but note was taken of where a single issue emerged in response to different questions both from an individual respondent and across respondents within groups.

The information in all the questionnaires was also considered as a whole in relation to the 8 questions asked (see Section 5). A table of the main issues raised was produced in relation to these.

Responses in relation to the three principles supported in the Water Framework Directive (the 'polluter pays', 'precautionary action', and 'recovery of costs of water services') were then evaluated (see Section 6).

Finally, proposals made by respondents were identified and grouped according to the issues they addressed (see Section 7).

Wherever possible, use of respondents' own words have been employed to convey meanings. This is particularly the case in Section 8 that deals with response from the different categories of respondent in turn. In Section 5 (overview of responses) this technique has been employed less, as an attempt is made to condense information.

4.3 Strengths and weaknesses of the data gathered and conclusions

There are a number of strengths and weaknesses to the information that was obtained from the completed questionnaires.

The open-ended nature of the questions allowed respondents opportunity to put across their perspectives on the issues raised, and on additional points. This allowed them to communicate their perception of the Water Framework Directive, issues of water quality and what they perceived as related matters.

The nature of responses varied widely. In some cases one word answers were open to different interpretations. For example, the answer "resources" to question 3 (about the perceived risks associated with the proposed administrative arrangements for implementation) is not clear. What aspect of resources represents the risk: excessive, inadequate and/or inappropriate resources?

Alternatively, in a few cases lengthy responses were given that were not always relevant to the immediate question or any of the issues raised in the questionnaire. Note was taken of these, and the information helps to illustrate those matters of significance to respondents in relation to water quality that are perhaps not considered by those involved with policy and implementation in this area.

In some cases where extensive additional material and discussions were presented, there is a risk that these lengthy responses assume disproportionate weight in the analysis. Caution was taken not to allow this to happen, and in most cases this material contributed positively by powerfully illustrating the point(s) made by multiple respondents.

Given the questionnaire-response basis of the information, it was not possible to explore meanings in any greater depth with respondents, and care has been taken not to make assumptions in interpreting individual answers. To some extent this limits the strength of the qualitative analysis that could be undertaken since it is not possible to "paint the fuller picture" of individuals' contexts, experiences and perspectives that would be the case if a more in-depth technique, such as interviews, had been used. However, it is intended to build on the understanding developed from the questionnaire feedback in the proposed seminar on this subject involving the respondents, allowing a third order interpretation of the findings to date.

The information collected in the survey is immensely valuable in illuminating meanings surrounding issues relating to water quality and the Water Framework Directive as they are understood within various sectors of the community.

It also provides the opportunity for respondents to examine the collected and analysed data to raise consciousness and focus attention on important issues.

Since the invitation to respond to the consultative document was made widely (both in terms of the recipients of the document and its availability on the World Wide Web), the opportunity existed for a great range of interest groups and sectors to volunteer their contribution. The absence of voices from particular sectors and interest groups amongst the respondents is of considerable significance. In the case of those who received the consultative document and did not respond, it can be considered that they selected themselves out of the consultation exercise. This raises the question 'why?' The points raised under 3.3 above may be of relevance here, but it is not possible to answer the question on the basis of the responses that were received.

Finally, it is important to stress that statistical data relating to the questionnaire responses should not be interpreted as representing a wider population.

4.4 A note on interpretation

It is perhaps worth noting that respondents to the consultative document vary widely in terms of their expertise in relation to water management issues. Some (apparently a small minority) are scientific or professional experts with extensive in-depth knowledge. The majority can be considered lay people, without particular specialist knowledge. The purpose of the consultative document was to establish an overview of the perspectives of a range of such people.

It is important to value the responses received appropriately, and not be dismissive in instances where the level of detail or understanding might be frustrating to a specialist working in this area.

Given the stress on widespread participation in implementation within the Directive itself, understanding "where everyone is at" is a vital step in moving towards a successful mechanism for working together to deliver the Directive's aims.

5.0 OVERVIEW OF CONSULTATION FEEDBACK

In this section a broad overview of all the responses received is initially presented (Section 5.1). Then each of the questions asked in the consultative document are considered in turns, considering all the responses received (Sections 5.2 – 5.9). This gives somewhat more detail and is intended to give an understanding of the main themes and issues arising from across all the responses. A brief conclusion is then presented, including a table summarising the main concerns raised by respondents.

5.1 Overall Summary of Responses

A wide range of water-related concerns was identified by respondents reflecting their working and personal interests. The dominant concern was in relation to water quality (over 62% of respondents), with a majority of respondents referring particularly to quality of water for consumption, but also for commercial and recreational activities and for wildlife and nature conservation reasons. In many cases these concerns were linked to other issues such as particular sources of contamination, or activities, etc. The next most significant concern related to pollution (as distinct from waste disposal), which was raised by over a quarter of respondents, followed by habitat loss/ damage (17%), waste disposal issues (13%) and eutrophication /nutrient enrichment and agriculture (both 12%). A considerable number of other areas of concern were reflected by around 10% of all respondents.

A significant majority of all respondents expressed clear support for the WFD (71.7%), with less than 10% opposed to the Directive. The remaining 19% of responses were unclear. In most cases where the Directive was supported, the support was strongly expressed.

In terms of the risks that respondents perceived with the proposed administrative arrangements for implementation, there were two themes that emerged strongly. Just over a third of all respondents raised issues relating to management structures and procedures for implementation, and just less than one third raised fears of inadequate

resources. A third slightly less widespread concern related to the credibility of local authorities in the process of implementation (raised by over 21%), and a fourth to the challenge of public involvement (over 18%).

Many suggestions were made as to how the public could be involved in the implementation of the Directive, and a full list of these is included in Appendix B. However, several themes emerged as significant from the answers given. The dominant theme concerned the perceived need for a much greater level of awareness, which requires greater availability of easily accessible and comprehensible information, and is clearly linked to necessary education programmes. The second clear theme concerned the need for active, rather than passive, involvement of the public at all stages from development of the River Basin Management Plans through their implementation to their revision, and associated with this the concern that there must be a genuine acceptance by the authorities responsible for the Directive that this public involvement is necessary. A third distinct, but less widespread theme concerned the need to provide support for the public (individuals, organisations and community groups) to participate in implementation. This included both provision of varied resources, from financial to expertise. The final significant theme that emerged amongst a significant minority of respondents was the need to established formal mechanisms or structures for representation of the public with the processes of implementation for the Directive. A number of suggestions were made as to how this might be done.

Five groups feature strongly amongst respondents views as to who should be involved in the long term management of the RBDs. The dominant group consists of 'stakeholders' (those with an interest), which were identified by over 60%. Just under 50% felt that local authorities and/or the 'relevant statutory agencies' should be involved. Three other groups were identified by a lesser percentage of respondents, but are clearly significant. These include regional fisheries boards (20%), and the Environmental Protection Agency and agricultural interests (both named by 17%). No other group or sector was identified by over 9% of respondents.

Over 60% of all respondents indicated that they were prepared to accept increased costs for implementation of the Directive. Just over 13% were not willing to pay additional costs, while 25% either did not respond to this question or indicated that it was not relevant/appropriate for them to answer.

Just under 30% of all respondents mentioned the 'polluter pays' principle, all expressing support for this (usually strongly). However, it is important to note that often the responses made clear that the 'polluter pays' principle was not taken to apply to all users, i.e. domestic water consumption. Only two respondents referred directly to the 'precautionary principle', both supporting its application, and only one respondent explicitly supported the principle of 'recovery of costs of water supply'. Two further respondents raised perceived difficulties with this principle.

A significant minority of respondents did not identify likely impacts of implementation of the Directive. Of those that were mentioned, two dominant themes emerge each in a third of responses. These are impacts on the work of respondents (especially amongst

environmental NGOs, local authorities and other statutory agencies) and general environmental and commercial benefits to be experienced as a result of implementation. A lesser theme was picked up amongst 12.5% of respondents who saw positive recreational benefits from implementation.

Amongst the very wide range of activities identified by respondents as needing control or restrictions in order to achieve the aims of the WFD, there are four main themes. Sewage treatment and disposal, including municipal treatment systems, domestic septic tanks, boat wastes and others, was cited by over 35% of respondents. Just over 30% of respondents listed agricultural activities. Waste disposal, including dumping, hazardous wastes, and packaging amongst others, was identified by over 23%, and planning and development activities and controls was also cited by over 22%. Other less commonly cited issues included industry (13.5%), water abstraction and use (9.2%) and domestic waste products such as detergents (8.3%).

Over 10% of respondents stressed the need for the establishment of a new, independent, national agency to take responsibility for overseeing implementation. It was made clear that this was for reasons of the scale and complexity of the task, the need for consistency, and to deal with matters transcend the boundaries of local authorities.

5.2 Question 1: What water-related issues are of most concern to you?

Three general themes emerge as dominating the concerns of respondents in relation to water. The most frequently cited concern is that of overall water quality. Precise definition of the issues included in this area was difficult to establish in all cases, and certainly varied between the responses of different sectors. There was a strong pre-occupation with drinking water supplies, perhaps not surprisingly this was particularly the case amongst the local authorities, other statutory agencies, clergy and individuals. However, water quality for a wider range of uses, and by more than just humans, was clearly of concern. This was the case amongst anglers, environmental NGOs, business and education respondents, who identified recreational requirements, commercial production, and other aquatic life forms (such as the Freshwater Pearl Mussel) as having specific water quality needs.

The closely related issue of pollution was also of serious concern to a majority of respondents, featuring as a distinct theme in seven of the 12 respondent categories. Pollution affects water quality, and there was evidence of overlap between these two themes, especially in relation to eutrophication, which was cited in discussions on water quality, pollution and habitat. However, it was distinguished from water quality in the answers given. In almost all cases pollution was considered as synonymous with waste disposal issues. These involved the activities of domestic individuals (for example in relation to use of phosphate-based household detergents), households (for example those relying on septic tanks), business and industry discharges, infrastructural developments in construction and operation (such as roads), recreational activities (for example the disposal of bilge waters and boat toilet wastes), and the activities of statutory authorities. The one activity of concern cited by all groups of respondents where pollution was specifically mentioned was agriculture. This was closely followed by issues relating to sewage treatment whether private or public facilities.

The third major theme emerging from the questionnaires related to habitat protection. Once again the concern was very broad, including aquatic habitats, wetlands and areas of peat bog, as well as other landscape features whose relationship with water resources (supply, quality and regulation of cycling) is not well understood. This concern was especially strong amongst anglers, educational interests and environmental NGOs.

In relation to each of these three themes, a significant number of respondents made clear that the issues of concern encompassed all activities that might detrimentally affect water resources. Agriculture was the most often cited commercial activity of concern, mentioned by just over 11% of respondents.

Specific areas of concern reflecting the definition of respondent categories are unsurprising, such as the theme of navigation-related issues that emerged amongst recreational NGO respondents.

5.3 Question 2: What do you think of the Water Framework Directive's new, and potentially tough, approach to protection and management of our water resources?

A large majority of respondents were supportive of the Directive, its aims and the characteristics of its approach. Majority support for the Directive is clear in all respondent categories except for agriculture and individuals.

The Directive is felt to be an important and, in a significant number of answers, an overdue initiative. Widespread support was apparent for a catchment or river basin based, ecosystem focused and integrated (cross-sectoral and multi-agency) means for implementation. While there was some question for many respondents about how 'tough' the implementation of the Directive would eventually turn out to be, a rigorous and robust approach was felt to be necessary. Scepticism was evident amongst a third of responses from the environmental NGOs and individuals, with one business respondent querying the need for the Directive and its timing.

Whilst welcoming the Directive, a significant undercurrent of cynicism was detected amongst respondents. This was detectable in a majority of responses. In part it is explained by reference to experience of poor policy implementation in the past. However, there were a number of issues raised that came up also under question 3. These included the challenge of co-ordination between government agencies, the resource requirements of the process and concerns over the need for sufficient political will to fully implement the Directive. There were also criticisms of aspects of public involvement; stakeholder identification and representation.

5.4 Question 3: What risks do you see with the proposed administrative arrangements for the implementation of the Water Framework Directive?

Four main themes were apparent in the risks identified by respondents in the proposed administrative arrangements for implementation of the Directive.

The strongest theme emerging in the responses to this question concerned the management structures proposed for administration of the WFD. Concerns in relation to

these were distinct themes in ten of the 12 respondent categories (in all but agriculture and business), and indeed was a dominant or principle theme in 7 categories). The all-encompassing nature of the task, carried out at such a large RBD scale was viewed as a risk. The fact that the boundaries of RBDs and local authorities are not coincident, the large size of the RBDs and the consequent requirements for co-ordination between competent authorities (and other pivotal agencies) were all seen as posing potential problems for implementation. The risks associated with excessive bureaucracy were noted by a number of respondents. There were clear fears of unacceptable inconsistencies between implementation in different RBDs, and even across different counties within RBDs.

Lack of resources to enable local authorities, other key agencies and indeed any actors (including the public / NGOs, etc.) to carry out their implementation role was seen as a problem, as was a lack of skills and dedicated staffing within these structures. This was seen as a major stumbling block to effective implementation, and also to delivering the public participation element of the Directive. This theme was evident in 8 out of the 12 respondent categories, and a key theme in 4 cases, including local authority respondents. The role of the local authorities within the proposed administrative arrangements was a focus of considerable concern. In 5 of the respondent categories this emerges as a significant theme. Most types of respondent, including local authorities (although not amongst responses from other statutory agencies), raised the potential problem of local authorities experiencing conflicting goals as a result of implementation of the Directive being added to their existing roles. There was significant evidence of a lack of confidence in local authorities to be able to deliver effective implementation of the policy. Several proposals were made that a new authority be established, or an independent executive to oversee implementation.

Involvement of the public was also seen as presenting difficulties within the administrative arrangements, as was enforcement, both of which were clear themes arising in 4 respondent categories. Interestingly, neither feature as major issues in responses from local authorities or other statutory agencies, but amongst those categories representing organised groupings of the public with a clear interest in participating (environmental NGOs, anglers, recreational NGOs, individuals and the clergy) this concern is very real. The enormous challenge of involving the public without delaying progress on implementation was noted. However, the majority of concerns related to poor articulation as to how they will be motivated and equipped to take part in the process, the mechanisms for the public to participate, and the problem of an the absence of skills within existing statutory authorities to facilitate them in taking part. The need for facilitation and conflict resolution training was specifically identified in the response from one local authority respondent

5.5 Question 4: How do you think that individuals, organisations and community groups can get involved in the preparation and implementation of the River Basin Management Plans?

There was considerable variation in answers to this question. Many respondents identified various techniques and media through which communication of information and

consultation could be facilitated. A significant number elaborated on proposals for the public to engage with the administrative structures responsible for implementation.

The dominant theme to emerge in answers to this question concerned the need for provision of adequate, accessible and comprehensible information, efforts to raise general awareness, and provide education in relation to water management issues, threats and the challenges of the WFD. This theme was present in 7 of the 12 respondent categories, including that of local authorities although not amongst other statutory agencies. It is a strong feature amongst the largest respondent groups, in terms of numbers of responses received – anglers, recreational NGOs, environmental NGOs, clergy, and individuals, which suggests that the majority of the ‘public’ represented in the responses overall sees this as an important issue.

There was widespread feeling that the public should not simply be recipients of information and able to respond in consultation exercises, but should be able to participate more actively both in the process of designing how implementation would take place and in the implementation itself. The relevant statutory authorities with responsibility for implementation also need to recognise the vital importance of public involvement. Angling groups, environmental NGOs and education respondents tended to stress the need to make full use of the knowledge and expertise held by NGOs, individuals and experts in the implementation process, and it was generally felt that there is an onus on the responsible authorities to motivate the public to become involved. The need for resources and support to enable the public to participate was also noted.

A significant minority of respondents suggested formal mechanisms for representation should be established for the interest groups and public who wished to be involved. It was suggested that various fora might be established. In turn, small steering committees might be set-up, or representatives be selected, and that these would engage directly with the management bodies. In some cases this was envisaged as an advisory role or relationship, and in others as direct representation in the decision-making process. These proposals came from respondents in local authorities, other statutory agencies, angling groups and from individuals.

Interestingly there was some feeling amongst the local authorities and other statutory agencies responses that the onus is on the public to engage in the process of implementation, identifying what interests or affects them and making their position known to the relevant authorities.

A number of specific proposals made in response to this question are set out in sections 7.0 below.

5.6 Question 5: Who should be involved in the long-term management of River Basin Districts?

The majority of respondents (over 60%) identified public stakeholders and interest groups as important participants in the long-term management of RBDs. In 9 of the 12 respondent categories stakeholders were the most (or jointly the most) frequently cited group to be involved in long-term management, and they were the second most

significant group mentioned amongst responses from other statutory agencies. In only two groups of respondents were public stakeholder interest groups not identified most often in answer to this question; amongst other statutory agencies where local authorities were more commonly cited, and the professional representative body mentioned only local authorities overseen by regional authorities and the Environmental Protection Agency. Interestingly, the local authority category expressed the highest support for involvement of all stakeholders in long-term management (75% of responses).

Local authorities, or relevant statutory authorities, were identified by over half the respondents as important to the long-term management of RBDs, featuring as a significant group in 9 of the 12 respondent categories.

Specific agencies (beyond local authorities) that were most frequently cited included the Regional Fisheries Boards (20% of all respondents, and particularly significant amongst angling, agriculture, local authorities and other statutory agencies), Environmental Protection Agency (17% of all respondents, and particularly significant amongst local authority and other statutory agency responses), and agricultural interests (17% of all respondents, and significant amongst angling and local authority response categories).

5.7 Question 6+7: Would you be willing to accept an increased personal cost for implementation of the Directive? If not, how should its costs be met?

A majority of respondents clearly stated that they were willing to accept increased personal costs for implementation. In most of these cases this position was qualified by requirements that finances be efficiently and effectively managed, with benefits apparent and value for money evident. The respondent groups where there was not a clear majority in favour of additional charges were the environmental NGO, other statutory agency, professional and agricultural respondents. Strongest support was apparent amongst business, clergy, recreational NGO, individual, angling and local authority respondents.

A small minority specifically stated that they would not be prepared to pay additional charges. However, in many of these cases this answer was qualified in ways that suggested that charges might be acceptable under certain conditions.

In the remaining answers the respondents' position was not clear or the question was not answered, but further comments again suggested that a significant proportion recognised the need for additional charges.

Where charges were considered acceptable, respondents were clear that these should be on a sliding scale reflecting the level of water use/risk of pollution. In one case it was anticipated that the early introduction of charges for water consumption would create the imperative for local authorities to deliver quality water services.

Specific support was expressed for the 'polluter pays' principle, by a sizeable minority of respondents from across the different interest sectors. However, it appears from the way in which the concept is referred to, that many respondents do not associate this with individual or domestic water use. There is an implication that this concept applies to significant polluters, which many who indicate their support for the principle do not consider themselves to be. It seems likely that this interpretation of the principle and how it relates to water use may need to be clarified at an early stage in the process of implementation in order to avoid the potential for conflicts developing later.

5.8 Question 8: How might implementation of the Directive affect your own activities?

The main areas of impact anticipated by respondents were in relation to work (33%), which was specifically cited by the local authority, other statutory agencies, and environmental NGO categories, and general environmental and commercial benefits (33%). Positive impacts on recreational activities was also anticipated by 12.5% of respondents.

There were significant differences between the responses of different interest groups to this question.

Environmental NGOs and local authority respondents identified primarily an increase in their workload and resource requirements as a result of implementation of the Directive. Local authority respondents also noted that it should make aspects of their work easier, but only in one case was mention made of directly of environmental improvements and enhanced enjoyment of these. A significant number of environmental NGOs did anticipate environmental benefits with positive knock-on effects for certain types of recreation.

The majority of other respondents anticipated improvements in water quality. In many cases they listed the effect of this improvement on their most immediate concerns first (angling and other recreational activities, drinking water supplies and so forth), but these were clearly linked to overall improvements in aquatic habitats and the wider natural environment. In some cases they were also associated with enhanced amenities and social and economic benefits for the population at large.

The business respondents identified very specific impacts on their activities, expecting to be subject to tougher controls, requiring related training and possible threats to their viability if high charges are imposed.

5.9 Question 9: What other human activities should be controlled or restricted in the interests of achieving the aims of the Directive?

Over 35% of respondents cited sewage treatment and disposal issues as needing control or restrictions in order that the aims of the Directive could be achieved. This included issues relating to septic tanks, absent, inadequate or overburdened municipal sewage treatment systems, and sewage disposal for boats. The issue emerged as particularly important amongst responses from anglers, individuals, local authorities and other statutory agencies.

Just under 30% of respondents identified agriculture as an activity that should be controlled. It featured as a significant theme amongst six respondent categories, angling, business, individuals, local authorities, recreational NGOs, and other statutory authority respondents..

Just over 23% of respondents listed waste disposal activities as requiring restrictions. These included dumping, hazardous substances, and landfill, but not industrial activities. The issue was noted most strongly amongst environmental NGOs, local authorities, recreational NGOs, business and agricultural respondents.

Planning and development of housing, commercial activities and infrastructure was also

mentioned in a significant minority of responses (22%). It featured as a significant activity requiring control amongst education, individual, and angling respondents, as well as amongst local authority and other statutory agency replies.

Amongst the local authority, environmental NGO and some individual respondents particularly it was also felt that water supply and demand also needed to be controlled more closely.

5.10 Conclusions and issues raised

The issues of concern to respondents shared three dominant common themes (illustrated in table 2 below). A more detailed examination of the responses from each interest group is presented in section 8.0 below. Other more minor themes are apparent, some of which are shared between groups and others, which are related to specific interests, such as navigation.

Water Quality	
for drinking water, recreational and commercial uses, and aquatic life forms	
Pollution	
Waste disposal issues	
<ul style="list-style-type: none"> • individuals (i.e. use cleaning agents) • households (ie. use of septic tanks & bio-flow units) • business & industry discharges (i.e. licensed discharges & incidental run-off, etc.) • infrastructure & development (i.e. road drainage & construction) • recreational activities (i.e. boat toilets and bilge pumps) • local authorities (i.e. waste disposal & municipal sewage treatment) 	
agriculture	
eutrophication	
Habitat	
aquatic habitats	peat bog
wetlands	landscape features

Table 2. Issues of Concern Raised by Respondents

There was strong general support expressed for the Directive and some of the main characteristics of its approach, most notably the focus on catchments and co-ordinating water management functions. It was clear that there was a significant amount of cynicism about whether the potential of the Directive will be realised and this was reflected in the range of risks identified in the proposed administrative arrangements. Four main areas of risk emerge in the responses. The management structures proposed were questioned, and

serious doubts were raised about whether adequate resources would be made available for implementation (whether to local or other competent authorities), thirdly, problems associated with local authorities were identified, and problems of achieving successful public involvement were cited.

Securing public involvement was seen as requiring increased provision of information, heightened awareness and education. This was a pre-requisite for achieving active participation in decision-making at River Basin District level. Several specific proposals were made as to how the public could become actively involved in implementing the Directive. These are identified in section 7.0.

Stakeholders/ interested parties dominated suggestions as to who should be involved in the long-term management of the River Basin Districts. Local authorities (or relevant statutory agencies) came a close second.

A majority of respondents indicated they were prepared to accept increased costs for implementation, providing that these were not excessive and they obtained value for money. A limited number were unwilling to pay additional charges, but in many cases these answers were qualified. Any charges made should be on a pro rata basis. Significant support was expressed for the 'polluter pays' principle, although the interpretation of this concept does not appear to have been consistent across all respondents.

While workloads were expected to increase as a result of the implementation of the Directive, it was widely anticipated that most people would experience positive benefits.

Sewage treatment and disposal, agriculture, waste disposal and planning and development activities were most frequently identified as requiring control or restriction in order to realise the objective of the Directive.

There was a remarkable consistency in the responses of respondents from different interest groups in relation to most questions. The differences that do emerge can clearly be seen to relate to the specific focus or concern of the respondent concerned. This remained the case in instances where administrative arrangements were discussed and in relation to public participation, where differences between the local authority respondents and others might have been expected.

6.0 RESPONSES TO WATER FRAMEWORK DIRECTIVE PRINCIPLES

The Directive explicitly adopts three fundamental principles, which inform much of its design and will have a major impact on how it will be implemented. The questions asked in the consultative document did not specifically address these principles, and explicit reference to them is limited, except in the case of the 'polluter pays' principle.

This section briefly examines how the responses in the questionnaires relate to the three principles and issues that arise from this.

6.1 Precautionary principle

This principle was only explicitly mentioned twice in the returned questionnaires, and nowhere was it clearly supported implicitly in the comments made.

6.2 Polluter pays principle

This principle was widely referred to (by just under 30% of respondents), most often in answer to the question about the acceptability of increased costs for implementation (6). However, as mentioned under 5.6 above, it is not clear except in 2 cases whether most respondents consider that it applies universally, particularly that it would include domestic use of water, especially for drinking. It is possible that there may be a distinction made between water for human consumption (possibly viewed as a right) and water for commercial purposes. This is clearly an issue for water supply (see 6.3 below), but it may also be an issue for domestic waste disposal.

It is not possible to ascertain this from the responses received, but it is suggested that this should be explored. If competent authorities working in implementation have a different understanding of the principle from the wider public, this may produce difficulties, particularly with proposed measures in RBD Management Plans. It will certainly affect both how charging might be implemented and also clearly the area of domestic water consumption.

6.3 Principle of recovery of the costs of water services

This principle appeared to be widely accepted, although only explicitly in 2 cases. Some respondents were very clear about the reasons why it is necessary: "to truly value a resource we have to feel we are paying for it. At present we believe there is no cost to the management and supply of our water. It must be made clear that there is an economic cost to the provision of water and the maintenance of catchment areas". A complementary idea was expressed by another respondent: "The goods and service arising out of water usage should not be free. The consequent environmental damage is a non-market value cost that is being borne by future generations and is currently not adequately considered in decision-making mechanisms. The clear association of additional costs for the implementation of the Directive should be communicated in a manner that clearly articulates why such costs are necessary. Policy options that explore the area of choice in terms of the cost burden are outdated and inappropriate." Other respondents pointed to the clear causal relationship between financial costs and behaviour, illustrated by the recent tax on plastic bags. They suggest that charges for water use would be the most effective way of reducing water use, promoting recycling and re-use, and so forth.

The majority of respondents accepted this principle, but the same issue can be seen to apply to this as was mentioned above in relation to the 'polluter pays' principle (6.2). Not only are respondents clearly happy that polluters pay for damage that they cause, but also that they have responsibilities and should be regulated not to abstract unacceptable quantities of water. However, there are only a very few occasions where respondents clearly accept the need to charge for domestic water supply. The understanding of this

concept and how it might work is worthy of further attention. Similarly, the interpretation that will be applied by the State in implementing the Directive needs also to be clarified.

In two cases respondents expressed serious concerns about how this principle might be applied, stressing that it should not be to the detriment of those on low incomes.

6.4 Conclusions

The questionnaire responses can arguably be seen to raise more questions about how the three principles espoused in the Directive are understood and interpreted, than they provide answers. Possible differences in the interpretation between the State and the wider public of these principles may create difficulties both in their working together in designing the process for implementation and in the implementation itself.

It is possible that the majority of respondents are not sufficiently familiar with these principles, or confident of their potential impact, to feel comfortable using or referring to them. In this respect, they may form part of the expressed need for more information/awareness.

It would be profitable to investigate the understanding of these concepts amongst the wider population. It is likely that the translation of these principles into specific policy tools and action by the State is not yet articulated. It may be useful to identify any discrepancies in the understanding of the concepts in order to address these, or alternately to inform policy development.

7.0 RESPONDENTS' PROPOSALS

A number of specific proposals were made in the questionnaire responses. It was anticipated that this would be the case in relation to ways in which individuals, organisations and community groups could get involved in the preparation and implementation of the River Basin Management Plans (question 6). However, many of the most fully articulated proposals were made in response to other questions or in relation to other aspects of implementation of the Directive.

This section sets out briefly the substantive proposals made by respondents.

7.1 Administrative arrangements:

Aspects of the proposed administrative arrangements for implementation of the Water Framework Directive were addressed in several proposals:

1. "changes are needed to improve integration of environmental issues into planning and policy and improved co-ordination of existing relevant work areas at local and national level is essential - Currently the four main work areas that relate to water quality - namely 'Water Quality, Sustainable Development, Water Supply and Conservation, and Participation/Community involvement are dealt with under different sections and directors in Local Authorities. Co-ordination of relevant work areas, not only on a local authority basis but also on a RBD basis will be a challenge".

2. "amalgamate the agencies involved/these functions"
3. "local authorities ought to endow themselves with water policy committees a number of whose members should be by law associated with the [River Basin Management] plans".
4. "Structures are in place at local level in four key areas and if enhanced these could be co-ordinated at RBD and Department Level to ensure successful implementation of the Water Framework Directive.

The four KEY WORK AREAS of Local Authorities dealing with KEY ISSUES relating to the WFD to some extent and with or without KEY DESIGNATED PERSON are as follows:
Development Control and Planning - Key Issue Sustainable development;

Community and Enterprise - Key Issue **Participation of community, agencies, etc.;**

Environmental Protection - Key Issue **Water Quality and Biodiversity;**

Water Services - Key Issue **Water supply, water conservation.**

To improve performance and co-ordination there needs to be a KEY DESIGNATED PERSON (with formal training and experience in WFD issues in each work area).

The issues of relevant training and experience is very important, currently many persons qualified to degree and higher level in the area of Environmental Science and related disciplines are effectively excluded from professional posts and management posts in Local Authorities, A weakness in the local authority system, , as identified in the document – Better Local Government, was the need for expertise to deal with complex environmental issues.

Environmental Protection work needs trained and experienced staff.

The Local Authorities differ from the Environment and Heritage Service in Northern Ireland in this way. The DoELG must ensure that Environment Sections are completely opened up to All Persons with Relevant Qualifications. The current practice of many local authority retaining all or most professional posts in Environment Sections for Engineering graduates (mostly Civil engineers) should end.

Local Authority Environment Sections should remodel themselves on the EHS system, EPA or similar and introduce trained Heritage Officers to Planning Sections."

5. "national and international expertise in the area of freshwater ecosystem ecology [should be used], thus the process could lack credibility and inappropriate plans could be developed. Involving only or largely NGOs and a couple of scientist will not suffice to ensure that the full objective scientific information is brought to bear in the overall implementation process".
6. "RBD Management Committees should be established which encompass the regulators, the users and the appropriate academic scientists and researchers. This is the experience from the USA and elsewhere. Reliance on the regulators and community groups/NGOs is not sufficient, as the objective scientific knowledge must be incorporated into any management plans."

7.2 Enforcement and compliance

Two proposals relate to enforcement and compliance with the Directive.

- "...the EPA, wildlife wardens and say community wardens should have greater powers and on the spot fines should be non-negotiable – 'polluter pays now and is named and shamed' must be the policy".
- "...codified regulations could be developed to deal with many small scale and/or low risk polluting activities with the view that compliance with such codified regulations would be deemed as complying with xyz legislation. The clear advantage of such an approach is simplicity, which in turn facilitates effective compliance monitoring at reduced administration costs. Prosecutions following from a breach of such regulations would presumably be simpler and more effective which in turn would lead to a higher level of compliance. One could argue that such an approach would undoubtedly lead to inappropriate measures in certain instances - however, I believe the aggregate result would be acceptable and this scenario would be a vast improvement on current practice where due to the complexity of the law and cost of implementation/ monitoring/ enforcement and prosecution all but the largest polluters go unchecked. As an example of the above consider the approach taken for Nutrient Management Plans. Currently farmers required to produce a NMP must monitor phosphorous and nitrate levels allowing the calculation of appropriate levels of nutrient application depending on the crop etc. and taking into account other factors such as soil type, slope, and aquifer vulnerability. A considerable amount of subjectivity can be brought to bear on these parameters not least the choice of location for soil sampling. I suggest that an approach could be taken where the appropriate authority would set prescriptive nutrient application rates. An individual farmer in adhering to such rates of application would be deemed to comply with the law and in the event he wishes to make a case for higher spread rates, may elect to develop a NMP. This would allow a simplistic approach for a large number of small farmers where the cost of operating a bespoke NMP may be excessive."

7.3 Public participation:

A range of suggestions were made about how the public could get involved in the preparation and implementation of the River Basin Management Plans. The following lists some of these, and variations on them.

- "enhancing the role of the Community and Enterprise Section of local authorities to include, as a priority development of participation aspects of the WFD and helping the coordination of the WFD key work areas of local authorities would be a useful starting place. The Community and Enterprise Sections in local authorities are doing good work in involvement of community groups, state agencies, etc. - perhaps their role could be examined/expanded and a designated WFD person appointed. Training in aspects of participation and the use of trained facilitators would also be useful to ensure real participation." Requirements under Article 14 "might be complemented by co-opting representatives of NGOs to the RBD Management Committees"

- Form "local groups of interested parties to identify issues they want addressed in the RBD Management Plans. Consult regularly with managers of RBMPlans."
- "Local CLAMS (Co-ordinated Local Aquaculture Management Systems) groups and Inshore Fisheries boards [should] discuss issues and make suggestions regarding River Basin Management Plans"
- "Cross cutting fora should be established co-ordinated by a higher level representative steering group or committee." A similar suggestions referred to an example "when the Lough Derg Scheme was being prepared ... a group was formed from the Lough Derg Working Group and this is comprised of officials from Local Authorities, Fisheries Board, Tourism & Development Agencies, Anglers, etc. This can be done through a) the County Development Boards and b) working through to regional level where you will have regional co-ordinated and inter-regional management plans."
- "Given the logistics of operating an IRBD committee, it would seem appropriate that there is a membership number cap. This will not prohibit the establishment of more localised 'feed-in' groups or individual river watch groups that could be facilitated by local community networks."
- It was proposed that "water users should be involved to advise Management Bodies. i.e. fishing associations, Boat Hire assoc. Sailing clubs, farm bodies, etc. Inland waterways assoc."
- "Tidy Towns type competition to raise awareness and involvement."

7.4 Recovery of costs:

Specific proposals were also made as to how costs of water services might be recovered.

- "costs ... should ...be.... met by charges levied for use of water (surface and ground) in proportion to the amount used (i.e. increased water rates)"
- "free water allowance to each household, with excess usage paid for, all commercial usage paid for"

7.5 Conclusions

It is interesting that respondents articulated relatively few distinct proposals for public participation (although many variations on similar ideas were apparent). There were a surprising number of proposals in relation to administrative structures and other aspects of implementation of the Directive.

It may be understood or assumed by respondents that existing statutory structures are likely to be involved in the implementation of the Directive. These agencies are relatively familiar to the population at large and it may be simpler in many cases to identify problems with these and make corresponding recommendations, than to try to consider wholly new structures and mechanisms to engage the public in the process. This may explain the focus of many of the proposals on existing issues and structures, rather than on new proposals for the future.

8.0 RESPONSES BY RESPONDENT TYPE

In each of the following sections the responses within individual categories are examined. After an initial introduction, an overall summary is presented. This sets out the main themes emerging from responses, drawing together points that may have been brought up in response to different questions by different individuals. As a result, occasionally themes may emerge more strongly in the overall summary than in relation to the most relevant question.

Within each category, each question is considered in turn, establishing trends, themes and priorities within the group.

8.1 Agriculture

Only two responses were received from agriculture-related respondents. However, one was from the Irish Farmers' Association and the other from Macra na Feirme, both of which represent a very significant portion of farming interests. For this reason and because of the distinct nature of the sector in relation to the issue of water management, and its potential significance in the implementation of the Directive, these responses have been considered in a separate category.

Overall Summary of Responses:

The answers indicate that the respondents see the WFD as a potential threat to commercial agriculture. The respondents did not make clear whether or not they supported the WFD, although the IFA was clear that the River Basin District and Management Plan approach to water quality management is sensible. The need for adequate institutional resources to carry out implementation was recognised.

Both respondents were clearly concerned that an equitable system of securing the objectives of the WFD be developed, fully addressing the role of all sectors of society.

Question 1. What water-related issues are of most concern to you?

It is clear that both respondents were concerned at the "contribution being sought from the farming community towards water quality protection and improvement, and the increasing costs to individual farmers of water supplies, and the expenditure required of farmers in protecting the water environment".

Concern was expressed that "Farming is a scapegoat for water quality" with other sources of problems such as phosphates in domestic detergents, inadequate sewage treatment, and other commercial activities not attracting adequate attention.

Recognising that as a major land use activity, farming must have a commitment to protecting and securing improved water quality, the respondents were concerned that a balanced and fair response from all sectors of society was required.

Question 2. What do you think of the Water Framework Directive's new and potentially tough approach to protection and management of our water resources? Why?

It was pointed out that the impacts of the WFD approach for farmers was not yet clear, but that farmers are already subject to extensive domestic controls (listed).

Concern was expressed "at the requirement to protect and bring surface waters to good ecological status which will be set by reference to a biological quality which would be expected to exist in conditions of minimal anthropogenic impact. This standard may prove very difficult, [and] costly, if not impossible to meet."

The Macra respondent felt that "The consultation process has been poor. Decisions are being made without relevant research being carried out, which are going to have a catastrophic effect on all land based activities mainly farming, forestry and horticulture. No compensation is being offered to landowners or to the many people who will ultimately be out of pocket. In some cases jobs are going to be lost."

Support was expressed for precautionary action if implemented fairly, and it was felt that the polluter should pay but that inequities in services provided between rural and urban dwellers' must be addressed in the charges made for recovery of water costs.

Question 3. What risks do you see with the proposed administrative arrangements for the implementation of the Water Framework Directive?

In the absence of any additional bodies to monitor and ensure the implementation of the WFD, both respondents felt that existing agencies do not have adequate resources to deliver the necessary action, including policing agreed measures. It was noted that there seems to be conflict between the existing organisations at present.

"The time table is too long, local authorities will look for others to blame for pollution and avoid itself, the biggest polluter. There needs to be a clear water agency."

Question 4. How do you think that individuals, organisations and community groups can get involved in the preparation and implementation of the River Basin Management Plans?

Both respondents were clear that adequate consultation with stakeholders is vital, with the IFA stressing that "all key economic stakeholder groups must be represented through River Basin District Management Steering Groups".

Extensive distribution of information through the media and local meetings were advocated, with necessary experts on hand to answer queries.

Question 5. Who should be involved in the long-term management of the River Basin Districts?

Both respondents expressed inclusive approaches to long-term management of RBDs, suggesting that all key stakeholders most affected by the implementation of the WFD, should be involved. The following organisations were named: Regional Fishery Boards, farming organisations, land based organisations such as Teagasc, Coillte, Dúchas, local authorities and community groups, housing groups and industry.

Question 6+7. Would you be willing to accept an increased personal cost for implementation of the Directive? If not, how should its costs be met?

The Macra respondent expressed the view that "those in our society that are deemed to have caused the problem should pay for the problem". However, attention was drawn to the increased costs already paid by farmers to maintain water quality, under various legislation and incentive schemes, which are not reflected by similar expenses for non-business or residential use. It was recognised that there is a need to secure a balanced contribution from all sectors of society

Question 8. How might implementation of the Directive affect your own activities?

The IFA respondent was clear that "the implementation of the Directive with the objective of attaining water standards equivalent to a biological quality reflecting minimal anthropogenic impact will prove to be very difficult for a major economic sector such as farming." In order to assess the impact of the WFD implementation, it will be necessary first to establish clearly the standards sought.

The Macra respondent anticipated reduced fertiliser use, curtailed slurry application, reduced stock numbers, and the imposition of pollution control measures beyond financial feasibility in too short a period of time as a result of the implementation. Forestry activities were also seen as likely to be seriously affected due to areas being classed as SACs, NHAs and acid sensitive.

Question 9. What other human activities should be controlled or restricted in the interests of achieving the aims of the Directive?

Domestic water use, constituents of domestic detergents, incineration and landfill were all cited in response to this question. It was felt that quantities of water used and treatment of waste water requires further attention.

8.2 Angling respondents

There were a total of 18 responses from angling groups. The potential significance of this number of responses within the total returned questionnaires was the reason that they were considered separately from other water-based recreational interests. The level of responses suggests a relatively high degree of awareness of the Directive and its potential significant impacts amongst anglers. Of the 12 who indicated their water-related interests, all but one referred to angling/ recreational fishing. One questionnaire listed concern for the environment, and another respondent made clear that they were both a member of a Regional Fishery Board and an employee of a Regional Fishery Board.

Overall Summary of Responses:

- 18 responses (15% of total responses)
- Water quality, habitat and pollution concerns were each cited by over 50% of respondents.
- 15 respondents indicated clear, but qualified, support for the Water Framework Directive
- 3 main risks were perceived in relation to the administrative arrangements:
 - difficulties associated with the credibility of local authorities as the competent authorities (50%);

- problems of inadequate resources (>30%) and;
- anticipation of poor enforcement (>30%).
- 3 lesser dangers were identified in over 20% of answers:
 - fears that the process would become bogged down in paperwork/bureaucracy, and;
 - that conflicts amongst vested interests would lead to a lack of co-operation to deliver the necessary measures were also seen as potential problems.
 - that poor public consultation and involvement would occur.
- A wide range of mechanisms were suggested to secure public involvement, with stress placed on the potential role and importance of existing groups, provision of information and the need to ensure that meaningful use is made of participation inputs from individuals, organisations and community groups.
- Over 50% felt that local authorities, fishery boards, angling clubs and 'all interest parties' should be involved in long term management of RBDs, and over 25% felt that agricultural and industrial interests should also be represented.
- Over 60% declared that they were prepared to accept increased personal cost for implementation, while 30% indicated that they were not willing to pay more.
- In total, over 25% expressed support for the principle of the 'polluter pays', but in only one case was it clear that this related to all individuals use of water.
- No mention was made of the other principles referred to in the Directive.
- Over 50% saw benefits to angling (through benefits to aquatic habitat and fish stocks) as a result of successful implementation of the WFD, over 33% identified benefits to associated tourism and related revenues. Only three respondents anticipated (and accepted) likely restrictions on angling activities.
- Over 20 types of activity were identified as requiring controls/restrictions in order to fulfil the aims of the Directive. Over 70% identified farming related activities, and over 45% listed sewage treatment (domestic, municipal and boat-related), with planning (particularly in riparian zones) cited by over 33%.
- Nearly 20% cited the need for a new, independent agency or watchdog to oversee the implementation of the Directive.

Question 1. What water-related issues are of most concern to you?

There were three clear dominant issues of concern cited by 50% of the angling respondents. These were water quality, aquatic or salmonid habitat, and pollution (including eutrophication specifically named in 33% of answers). Over 20% of answers raised concerns associated with agriculture including slurry spreading and the use of pesticides. A number of other issues were raised by up to two respondents. These were

• water drainage	• coniferous forestry development
• neglect of waterways	• fish life
• agricultural activities 4	• integrated approach to water management by all stakeholders

• industrial developments	• full implementation of polluter-pays principle
• end to fluoridation	• full implementation of the WFD
• development impacts	• biodiversity (re: aquatic habitat)
• water abstraction	• clean water for consumption
• dumping	• gravel removal from river beds
• turf cutting	• flooding

In addition two fishing-related concerns were raised whose relationship to water management under the WFD is not immediately apparent from the questionnaires. These were the perceived need to stop draft netting for salmon, and to regulate the dangerous and irresponsible use of boats and jet-skis.

Question 2. What do you think of the Water Framework Directive's new and potentially tough approach to protection and management of our water resources? Why?

Responses to this question included comments on the existing situation regarding protection and management of water resources, and anticipated difficulties in the proposed Water Framework Directive approach. However, over 80% of respondents were clearly supportive of the Directive, with half indicating that it was overdue and that a 'tough' approach is necessary. The integrated approach adopted and the 'ecological' rather than just 'biological' measure of water quality were particularly welcomed. Almost a quarter of respondents stated that the Directive was not tough enough and one indicated that a 'zero tolerance' approach to action damaging water resources should be adopted. A further suggestion for additional measures advocated legislative changes "to ensure that offences are legally deemed to be statutory offences [that] are classified as serious and always dealt with on indictment", reflected the perceived need for active enforcement. Over 25% of respondents expressed their dissatisfaction with the "inadequate present situation" of water management with 2 respondents identifying a potential difficulty with local authorities taking responsibility for delivery of the WFD, being themselves polluters in a number of instances. Related to this, a suggestion was made that a 'watchdog' body is necessary to oversee implementation of the Directive.

Two respondents raised the issue of the need for adequate resources.

Individual respondents also proposed that the agencies involved (or the functions concerned) should be amalgamated, and that it should be made "compulsory for industrial users to recycle and have [water] output greater than intake".

Question 3. What risks do you see with the proposed administrative arrangements for the implementation of the Water Framework Directive?

In direct response to this question, three dominant risks were identified. These included a lack of confidence in local authorities as competent authorities (50% of respondents), the risk of inadequate finance, and ineffective enforcement (each cited by over 33% of respondents).

Respondents felt that local authorities "often contribute to the problems themselves", and had a poor record at self-policing. Others stated that local authorities "have never given water quality the priority it deserves" and that they are "not capable of turning over a new leaf" in this regard. One respondent felt that they were inappropriate as the administrative authorities for dealing with catchment-based issues. Some answers made clear that local authorities ought not to be confirmed as the competent authorities responsible for implementation of the Directive.

A clear area of concern surrounding the complexity and bureaucracy of administering the Water Framework Directive emerged. Half the responses indicated worries that the arrangements would become "overly bureaucratic", involve "too many organisations" that it would be difficult to co-ordinate and that there would be problems with a "failure locally to streamline legislation". "As water sees no boundaries, although RBDs will be set up, there will have to be open communication between neighbouring districts and the Dept. of Marine, etc. - so in effect there will need to be a national strategy rather than a regional one". In addition, a concern was expressed about uncertainties facing administration in Northern Ireland. A risk of delay in achieving 'good status' by the deadlines laid down was associated with these concerns.

Over 20% of respondents also mentioned issues concerning consultation. These included risks of "not getting the message across to the public" and "not getting the public involved", a general "lack of consultation" and a "marginalisation of current users". Three responses proposed that "there is a need for an independent body [or new authority] to oversee the Directive, and where the public can have transparent and realistic input into the workings of the Directive".

Difficulties associated with conflicts of interests between water users with vested interests were seen, by over 25% of respondents, as presenting problems in achieving the necessary co-operation to deliver the objectives of the Directive.

A number of other risks were also identified. These included the lack of information and consultation identified to date, and perceived likely ongoing difficulties in "getting the message across" and getting the public involved; the long time frame for implementation; and the number of organisations involved.

Question 4. How do you think that individuals, organisations and community groups can get involved in the preparation and implementation of the River Basin Management Plans?

Several areas emerged as significant in responses to this question.

Information supply was most frequently the subject of comment, with one respondent noting that "this is the first time we have heard of the WFD", and another that the Heritage Council consultative document is an example of the necessary awareness raising initiatives. Respondents suggested that a "significant public campaign [be run] by EPA/Councils etc. to motivate individuals/organisations to get involved" and that all interested parties should be notified. Several respondents mentioned meetings and discussion groups, and the need to specifically engage with existing groups and organisations. These included angling clubs, environmental NGOs, farmers organisations,

Teagasc, Waterways Ireland, Co. Councils and so forth, who could bring the WFD to the attention of community, involve them, and inform them of their importance within the cycle - i.e. local knowledge of rivers, streams, lakes flood plains, etc. The suggestion to "show it might work!" would also form a part of this information.

In relation to a mechanism for involving individuals and groups in the River Basin Management Plans, a "need [for] a liaison arrangement proposed where representations and responses could be dealt with" was identified by one respondent and developed further by another as "advisory committees with balanced representation of individuals, organisations & community groups in each catchment, consulted by designated authority & views incorporated into plans". Another answer proposed "forming catchment management groups bringing together all users which are affected". This type of approach was reflected amongst a third of responses. A further proposal was for a "WFD 'ombudsman' to operate as an independent interlocutor and ensure parity of representation and adequacy of response".

Two aspects to funding concerns were raised. One respondent indicated that "lack of funding will inhibit voluntary agencies [from getting involved]". Another suggested that "lack of funding [for] agencies [involved] will hamper in-depth analysis of benefits of Directive" that are necessary to keep participants (State and non-State) committed.

It was observed that participants must have a meaningful role in the consultative process with their views taken on board in regular meetings. A hands-on approach was supported, with the use of competitions amongst non-statutory bodies, etc. One respondent stressed that there should be no political appointees.

Question 5. Who should be involved in the long-term management of the River Basin Districts?

Half of respondents referred to involving "all interested parties", "water users", "public", "stakeholders" and "all who benefit". It is not possible to be sure of the extent of overlap of the definitions applied by respondents. However, in most cases lists also identified distinct non-governmental sectors such as agriculture, industry, recreation, and so on. In which case it may be presumed that this general category relates to non-commercial actors and the wider public. Specific groups within these categories that were mentioned included conservation bodies, NGOs, recreation/leisure interests and community groups. In all instances there was clear identification of a partnership-type approach between all those groups involved, statutory and non-statutory.

Perhaps not surprisingly 50% of respondents also felt that the Regional Fisheries Boards should be involved in the long-term management of the RBDs, with slightly fewer also listing angling clubs. Over a third of respondents saw agricultural representative groups and national agencies as important participants, and a similar number identified the business and industry sector, such as the Construction Industry Federation. The Environmental Protection Agency was also cited in over 33% of answers. Other non-state agencies named included Group Water Schemes, tourism representatives, and educational authorities

Over 50% of respondents identified local authorities or "all interested state bodies" should

be involved. (Although over 15% proposed new overseeing structures to handle the long-term management of the River Basin Districts). Other state agencies identified included Office of Public Works, ESB, Bord na Mona, Dúchas, Coillte, Dept. of the Marine, Garda Síochána, and Civil Defence, the Heritage Council and all sanitary authorities.

Question 6+7. Would you be willing to accept an increased personal cost for implementation of the Directive? If not, how should its costs be met?

Eleven of the 18 respondents (over 60%) indicated that they would be prepared to accept an additional cost for implementation of the WFD. However, all of these respondents qualified their willingness to pay depending on the amount involved (which should reflect the nature of the water use concerned), evidence that the measure would work, and the strongly expressed requirement that the monies were to be spent on implementation and not administration and should be accounted for transparently.

Six respondents indicated initially in their answer to this question that increased personal costs would not be acceptable, but in each case they proceeded to qualify their answer implying that some additional costs in certain areas might be acceptable. One answer was not clear.

Over 20% of the answers referred to use of the 'polluter pays' principle, indicating that this should be the basis for funding implementation of the WFD, although one identifies a problem associated with this, namely that "there is lip service to the polluter pays concept. While we have 'dump' levies administered by DOELG there are no meaningful levies (other than discharge licence fees) for the use of waste assimilative capacities in waters or for the maintenance of a pollution eradication /good quality status achievement programme".

Two proposals are made for financing implementation of the WFD:

- a) "costs ... should ...be.... met by charges levied for use of water (surface and ground) in proportion to the amount used (i.e. increased water rates)"
- b) "free water allowance to each household, with excess usage paid for, all commercial usage paid for"

Only in one case is it apparent that the respondent considers the polluter pays principle to relate to domestic water use by individuals.

Question 8. How might implementation of the Directive affect your own activities?

Over half the respondents perceived potential improvements in their angling activities, associated with benefits in terms of aquatic habitat and fish stocks. These improvements were seen as linked to potential social and economic benefits for the wider community, with over 20% referring to improved tourism potential and associated increases in local revenue. Three respondents anticipated possible restrictions on water-based recreation (on the use of fishing flies and outboard engines), while another saw positive results from restrictions on agricultural pollution.

One respondent reported that they would "be more careful of ..[their].. influence on water. ... will report leakages, pollution, illegal dumping, turn off taps, etc.".

One answer made clear that it was not possible to determine the effects of measures that have not yet been drawn up.

Question 9. What other human activities should be controlled or restricted in the interests of achieving the aims of the Directive?

Over 70% of the angling respondents named farming practices as requiring controls or restrictions in order to achieve the aims of the Directive. Specific mention was made of the need to restrict intensive agricultural practices, pesticide use, and fertiliser spreading - in line with the "land's nutrient assimilative capacity and run-off".

Just under half the respondents identified sewerage and waste water treatment issues as important; with the use of septic tanks and bioflow units, absent or overloaded minor sewage treatment/ filtration plants, municipal sewage, and disposal of all boat sewage each mentioned. This category was closely linked to that of all discharging activities, with increased inspection of licensed effluent discharges requested, and testing of all water bodies.

Development control issues were numerically the next most significant activity respondents felt were important; identified as important by a third of respondents. These included increased restriction on industrial developments, 'ribbon' type housing development, and planning controls in riparian zones, river flood plains and sensitive river corridors (especially on heavy clay soils, marshes and wetlands). One respondent stressed the need for Regional Fisheries Boards' objections to planning proposals to be given more weight.

Forestry activities, dumping, and the issue of the use of household detergents were each raised by two respondents..

Four further activities were identified: drainage from maintenance/mechanical yards, businesses and roads; leisure activities; gravel removal from river/stream beds; and turf cutting. Additional points were made concerning the need to enforce other EU Directives (especially Nitrates), for active enforcement against offenders, and to consider the private ownership rights generally pertaining to rivers.

8.3 Business

This group includes only six responses. These included the Irish Boat Rental Association, Taighde Mara Teo, a shellfish hatchery and on-growing facility, and the Construction Industry Federation, the Irish Fishermens' Organisation, and the Electricity Supply Board. This group is small but does reflect different interests and uses related to water, which are demonstrated in the variety of issues raised in response to the questions in the consultation document.

Overall Summary of Responses:

- 6 responses (5% of all responses)
- Water quality concerns were identified by all respondents, with specifics related to their particular activities
- 5 of the 6 respondents expressed clear support for the WFD, 1 questioned the need for it
- 2 respondents mentioned inadequate resources as a risk for implementation, amongst other reasons cited by individuals
- a range of mechanisms for involving the public were proposed, 1 respondent opposed the involvement of the public
- 4 of the 6 respondents identified community/stakeholder interests as important in long term RBD management, amongst other bodies mentioned in individual answers
- 5 of the 6 respondents would accept increased personal costs for implementation, 1 answer was unclear
- 2 respondents supported the principle of the 'polluter pays', no other principle was mentioned
- a variety of likely impacts of implementation were anticipated by the various respondents linked to their specific business interests
- 10 different activities requiring control/ restrictions were mentioned by individuals, dumping and agriculture were each mentioned by two respondents

Question 1. What water-related issues are of most concern to you?

All six respondents referred to water quality issues, particularly mentioned were estuarine and coastal waters, drinking water and aquatic habitats. Pollution issues included micro-biological factors (significant to the aquaculture business), the disposal of sewage waste from cabin cruisers, and agricultural nutrient run-off. There was also a concern expressed about the need to standardise water charges. One respondent was concerned about water availability and flooding-related issues.

Question 2. What do you think of the Water Framework Directive's new and potentially tough approach to protection and management of our water resources?

Why?

Five of the six respondents were positive about the introduction of the WFD, one suggesting that it is "better late than never". One makes clear that the change to a focus on water quality rather than water use is welcome, and points to disappointment over perceived failures to fully implement other EU Directives, notably the 1979 Protection of Shellfish Water Directive. Another endorses the 'polluter pays principle' and incentives to encourage efficient use of water. While one is concerned that the practical application of the Directive may not match the theory.

The sixth respondent queries the need for the WFD itself: "section (9) of the untitled preamble (p1. 327/2) states – 'It is necessary to develop an integrated policy on water'. Nowhere does it state why it is NECESSARY. With 10 new states acceding to the EU, it seems a most inappropriate time to impose a further Directive the need for which is very questionable".

Question 3. What risks do you see with the proposed administrative arrangements for the implementation of the Water Framework Directive?

Two respondents cited availability of resources in terms of finance and staffing as a risk to effective implementation. One also questioned political commitment to the Directive, especially in the long-term or in perceived politically sensitive situations, reflecting public indifference,/ hostility/ ignorance, etc. and cited the risk that policy direction might be unduly influenced by the best organised/most vocal interest groups. Another respondent suggested that "Directive will probably function in the UK, Germany and similar disciplined states - not in France, Ireland and the Accession states". This respondent agreed "that a multi-agency approach is needed but would like to see an executive in place managing each catchment (with ability to draw on resources of existing agencies)". Another respondent proposed the appointment of an ombudsman to oversee implementation, and a further answer reflected this concern: "there is no single organisation or authority with overall responsibility for a particular River Basin District. This has the potential to result in uneven implementation. However, there will be opportunities to include measures to address any such problems in the River Basin Management Plans".

Question 4. How do you think that individuals, organisations and community groups can get involved in the preparation and implementation of the River Basin Management Plans?

Two respondents indicated that they felt it was important to get all parties involved in education, awareness and training, and to make use of consultation meetings. A proposal that "web sites [be established] for each [RBD] with interactive GIS so that public can input info, including pollution incidents in real time" was also made. A third respondent saw difficulties in actively involving individuals, and while they felt that community groups should be involved, they were concerned that "some mechanisms would be required to define such groups and to rationalise representation to avoid risk of unwieldiness". A concern that organisations with most resources would try to dominate and control proceedings was also expressed. The need for transparency was stressed in order for groups and individuals to get involved.

One respondent thought that individuals, organisations and community groups "should not get involved". This was expanded on under question 5 where the respondent indicated that only Waterways Ireland should be involved in the long-term management of the RBDs, although they should be obliged to consult specified bodies, the respondent's organisation being the only such body named.

A further respondent cited the provisions for public consultation required under the WFD in response to this question, but did not add any further comments.

Question 5. Who should be involved in the long-term management of the River Basin Districts?

Four respondents identified community groups/ all users/ stakeholders/ major stakeholders/ sectoral interest groups within the RBD as being important to be included in the long term management of the RBDs. Individuals identified a number of other agencies that should be involved including the Dept. of the Environment, Heritage and Local Government, local authorities, relevant experts on the issues involved, the Environment Protection Agency and the Heritage Council.

One respondent stated that only Waterways Ireland should be involved in the long-term management of the RBDs (see above).

Question 6+7. Would you be willing to accept an increased personal cost for implementation of the Directive? If not, how should its costs be met?

Five of the six respondents expressed a clear willingness to accept increased personal cost for implementation of the Directive. One qualified their willingness "provided the cost was evenly allocated and proportionate to the water use and/or effect on the water condition during use" and another was clear that they were willing to pay for personal water use, but went on to express the concern that "any charge for using rivers and lakes for the hire cruising industry would have to be absolutely minimal because of the fragile state of the industry".

The sixth answer consisted of a series of questions: "what is involved in personal cost? how is it measured? How is it to be applied in an equitable manner? Is it realistic in relation to total costs? At what level of efficiency will the system function, i.e. will funds be spent in the most efficient and effective manner? and what is State involvement in financing?".

Only one respondent expressed explicit support for the 'polluter pays' principle in response to this question.

Question 8. How might implementation of the Directive affect your own activities?

Six distinct impacts on the activities of the respondents were envisaged:

- tougher controls on [aquaculture] discharges;
- re-grading of coastal waters to Class A allowing direct sale of aquaculture produce to the consumer;
- awareness of the new Directive and training within the construction industry;

- over zealous legislation and/or excessive costs, would decimate the hire cruising industry;
- improved spawning and survival rate of salmon;
- increasing monitoring and regulation of water bodies used in power generation / cooling, but no major implications for the ESB.

Question 9. What other human activities should be controlled or restricted in the interests of achieving the aims of the Directive?

In two cases agricultural practices were identified as activities that should be controlled or restricted, particularly restricting grazing of cattle close to streams, fertiliser run-off, and associated activities were mentioned. Dumping (including specifically in inshore waters) was also mentioned by two respondents. Aquaculture activities, including the use of insecticides and chemicals were also cited. Pollution from industry of all types was mentioned, as were stormwater soakaways, sand/gravel extraction, and domestic detergents. It was pointed out that there are "plenty of good practice models available internationally" that might be adapted and applied here. General support was intimated for the categories of activity listed in the consultative document.

One respondent was clear that "all activities which involve abstraction of water or disposal of effluent or use of materials which have the potential to pollute water bodies, from point sources or from run off, need to be controlled and if necessary restricted if they prevent a body of water reaching 'good ecological status' as outlined in the WFD".

8.4 Clergy

Eight completed questionnaires and a letter of response from Bishop Jones (Elphin Diocese) were received from members of the clergy. In addition an acknowledgement was received from Cardinal Connell. In some cases these responses appear to have been made in an individual capacity, and none claim to set out the agreed response of any particular church. However, given that these respondents are members of powerful national institutions, and the significant number of responses, they are considered as a distinct group.

Overall Summary of Responses:

- 9 responses (7.5% of total)
- Over 55% of respondents mentioned water quality concerns, and these were dominated by concerns over quality water supply for domestic consumption. 33% were also concerned about the lack of awareness of water-related problems and education about this.
- Nearly 90% of respondents expressed clear support for the WFD (1 respondents' answers were unclear)
- Several risks were identified for implementation, with multiple respondents mentioning enforcement and consistency.
- A range of methods for involving the public in implementation were suggested, these focused mainly on information provision and awareness raising (44%), and active seeking of public participation.

- 55% of respondents indicated that all stakeholders/ interested parties/ users and consumers should be involved in long term management of the River Basins.
- 66% were prepared to accept increased personal costs for implementation, 22% were not, the remaining respondents either did not answer the question or their answers were unclear.
- One respondent indicated clear support for the 'precautionary principle' and another for the 'polluter pays' principle.
- 33% saw little or no (negative) impacts of the WFD on their own activities, several other potential effects were identified by individuals.
- A number of other activities requiring control/restrictions were listed by respondents.

Question 1. What water-related issues are of most concern to you?

Five of the respondents (55%) were concerned with the supply of good quality water for domestic consumption, three (33%) mentioned a perceived lack of public awareness and education concerning problems of water management, and concerns over pollution, apparent deterioration in water quality across the country, excessive consumption and issues of water safety were also mentioned.

Question 2. What do you think of the Water Framework Directive's new and potentially tough approach to protection and management of our water resources? Why?

Eight of the nine respondents expressed strong support for the WFD, applauding an increased value being placed on our water resources, the application of an integrated approach, and the need for active enforcement. Widespread deterioration in water quality across the country had been perceived by several respondents. It was felt that a greater public awareness of the problems of water management is necessary, and that the relaxed national attitude to this resource needs to be altered. A comment was made that "[T]hose who pollute must pay so that damage may be undone and further damage prevented. All should pay for necessary precautionary measures".

Question 3. What risks do you see with the proposed administrative arrangements for the implementation of the Water Framework Directive?

In response to this question, several difficulties were envisaged by individuals in relation to the proposed administrative arrangements for implementation of the Directive. It was noted that the RBDs are large and likely to be difficult to manage, with uncertainty about "how 'one Local Authority will take the lead' - Will standards be consistent throughout the RBDs?". In addition, one respondent was concerned that "the [river] catchment areas might not coincide with other catchment areas (Co. Councils, Health Boards, etc.) Some might use this to fall between two stools/escape the net [in terms of implementation]". One respondent noted that "present administration bodies will not take this Directive on board without additional staff", and that there was a danger of a "blurring of lines between activity and positive action"

Question 4. How do you think that individuals, organisations and community groups can get involved in the preparation and implementation of the River Basin Management Plans?

Over 44% of respondents referred to the need for greater information dissemination and awareness raising in relation to the issues that the WFD seeks to address and several suggestions are made in relation to this; including public meetings, questionnaires, conferences, PR campaigns. One respondents stressed the need for the public to 'own' the Plans, so that they would support their implementation. Without this support, implementation would be immensely more difficult if not impossible.

One respondent felt "that organisations with a vested interest in clean water have a special right to be heard. Farmers' representatives and industrial management should be strongly encouraged to make a commitment to improving our water. Local Authorities (and possibly churches) should be active in seeking the views of local groups and individuals." With another of the view that "each organisation at national level should have a suitably qualified representative on the board in the preparation and implementation of the River Basin Management Plans".

Question 5. Who should be involved in the long-term management of the River Basin Districts?

Five of the nine responses to this question applied a variety of terms ('stakeholders'/ 'everyone'/ 'users and consumers'/ 'community groups') that appear to imply an all-inclusive approach to long-term management of the RBDs, although one respondent was clear that "it is imperative that very interested parties, such as the major industrial and agricultural polluters whilst being consulted are nonetheless kept out of the long-term management of the RBDs. The risk of corruption is simply too high and the stakes too high".

One respondent proposed a new and independent "Department of Water, with a county inspectorate or perhaps under the Department of Fisheries and the Marine", while another referred to the officers of local authorities.

Question 6+7. Would you be willing to accept an increased personal cost for implementation of the Directive? If not, how should its costs be met?

Two-thirds of respondents were prepared to accept increased personal costs for implementation of the Directive. Several respondents reflected the sentiment that "[S]ince everybody is going to benefit from what is achieved all should be asked to pay a certain amount of the cost of achieving the objectives here" and moreover that "THERE ARE NO FREE LUNCHES IN THIS WORLD. Everything has to be paid for and we all have to shoulder our fair share of the costs. It all comes down to the definitions of fair. But natural justice indicates that you clean up your own mess. This is true whether you are a farmer, a major industry or just a dog owner!". One respondent stressed the need for social considerations to be taken on board in considering mechanisms for recovery of costs; "water itself is a basic necessity of life and to charge all consumers equally, by its very nature penalises the less well off. This is something to be kept in mind when making decisions."

Two of the nine respondents were opposed to increased personal charges, one stating that "householders are already paying more than their fair share for services", and another that costs should be met through "national taxation, especially met by the polluters". One respondent made no clear response to this question.

Question 8. How might implementation of the Directive affect your own activities?

A third of respondents did not envisage any (negative) impact on their own activities as a result of implementation of the Directive.

Other respondents indicated effects on themselves ("I should use less pesticides, less disinfectants. I would welcome proper facilities to take care of all sewage in our waterways. Lack of proper facilities has forced me and other boat-users to discharge sewage into the lakes and rivers."), and on others ("If individual activities are not compatible to the proposed Directive, much capital expenditure may be needed and could lead to individuals going out of business."). One answer envisaged "restore[d] confidence in use of water with improved safety and cleanliness".

One respondent proposed that there was a role for the clergy in relation to awareness-raising on the WFD. "As a clergyman I already encourage my flock not to pollute or waste. That is as valid for water as it is for any other part of creation. You may be aware that 'harvest festival' is a major autumn-tide festival in the Church of Ireland. It would be well worth the effort to make sure all Church of Ireland clergy are made aware of the Water Framework Directive, as it seems a natural subject to include in harvest creation-style sermons."

Question 9. What other human activities should be controlled or restricted in the interests of achieving the aims of the Directive?

Four of the nine respondents either did not answer, or did not feel able to answer this question. One suggested that "[T]o talk of controlling or restricting human activities is approaching the task from the wrong direction. As a nation we do not have the German obedient mindset. We do however respond to effective education. People can be made aware that throwing used engine oil on waste ground may get rid of it, but WILL increase the risk to their grandchildren."

Individuals also mentioned non-intensive agriculture, use of household detergents, and speed and waste management for (speed) boats, as activities needing controls or restrictions. One respondent suggested "the extension of the very successful campaign against use of plastic bags to other kinds of pollution. A list should be compiled of all the things that are known to cause damage to the environment and these things should be considered for some form of taxation to reduce the damage being done by humans through careless and excessive use of such products."

8.5 Community NGO

Only three responses were classified as community NGOs. Two of these were from the National Federation of Group Water Schemes (NFGWS) and one from the Irish Water Safety Association (IWSA).

Overall Summary of Responses:

The three respondents all support the WFD, anticipating administrative difficulties in implementation. Two expressed a willingness to accept increased personal costs for implementing the Directive. Information provision and public meetings were advocated to get the public involved in implementation, and representatives of local and national user groups as well as relevant state agencies were seen as necessary in the long-term management of the River Basins. Changes in personal and community behaviour was envisaged as a result of the WFD implementation.

Question 1. What water-related issues are of most concern to you?

The NFGWS respondents cited the degradation of raw water sources for drinking water, especially by septic tanks and agricultural activities as their primary concern. The IWSA expressed two concerns; firstly that there is reduced recreational activity by the public due to poor perceptions of water quality, and secondly that water quality should be of a standard that "the water be of such a standard that the public can enjoy all aquatic activities safely"

Question 2. What do you think of the Water Framework Directive's new and potentially tough approach to protection and management of our water resources? Why?

All respondents supported the approach of the WFD, identifying the importance of water as a basic requirement for survival for this and future generations. It was felt that "it will lead to an overall improvement in the quality of our water", and that this in turn would encourage more recreational use of water, with positive economic impacts.

Question 3. What risks do you see with the proposed administrative arrangements for the implementation of the Water Framework Directive?

Administrative difficulties were anticipated by all respondents, especially as the various local authorities and other relevant agencies seek to work together. One respondent thought that this would be more problematic without a new administrative structure being established, and another was concerned that "the process will be 'officially-driven' rather than 'community-driven'". The IWSA respondent thought that all likely risks should be surmountable with positive co-operation, attitude and good communications.

Question 4. How do you think that individuals, organisations and community groups can get involved in the preparation and implementation of the River Basin Management Plans?

A variety of suggestions were made in response to this question relating to information (circulars sent out to interested people agencies and organisations), participation (public fora), and using existing groups such as the respondents in this category. One respondent proposed that "we could follow the example set in America (www.epa.gov) involving local communities in source protection from erecting signs notifying people of the possible risks to the water supply to setting up of watershed protection organisations, organising festivals to raise awareness about the threats to water etc. Funding could also be sought be community groups through EU Interreg Programmes – e.g. the Cycleau Project – a transnational project involved in researching and finding solutions to common problems relating to river basin districts in Ballina, Co. Mayo, England and France."

Question 5. Who should be involved in the long-term management of the River Basin Districts?

All respondents indicated a very open and inclusive approach to the long-term management of RBDs, stressing that all people who use water resources should be involved. Interests cited included all relevant state agencies and local authorities, rural water monitoring committees, community development groups, farming, fisheries and forestry organisations, rural dwellers, group water schemes, tourism organisations, An Taisce, and other NGOs. One respondent was clear that the local authorities should be required to involve as many stakeholders as possible in making decisions.

Question 6+7. Would you be willing to accept an increased personal cost for implementation of the Directive? If not, how should its costs be met?

Two respondents indicated that they would be prepared to accept increased costs in a personal capacity, but one was doubtful about the wider acceptance of this and proposed heftier fines on polluters and alternatives sources. The third respondent pointed to the unique position of Group Water Scheme members in already paying for the treatment and distribution of their water.

Question 8. How might implementation of the Directive affect your own activities?

Several impacts of WFD implementation were identified by respondents including changes in disposal of household wastewater, use of household detergents, increased recreational water use, and other impacts at both a community and personal level.

Question 9. What other human activities should be controlled or restricted in the interests of achieving the aims of the Directive?

A range of activities was listed in response to this question. These included agriculture, planning, recreational activities, and sea transport.

8.6 Education

There were five responses in this category, all originating from respondents based in third level education establishments; one from a postgraduate researcher and four from academic staff.

Overall Summary of Responses:

- 5 responses (4.2% of total response)
- 60% of respondents were concerned with aquatic habitat, resource availability and use, and with pollution. 40% raised concerns related to flooding.
- All expressed support for the WFD.
- 4 of the 5 respondents identified potential risks associated with local authorities as competent authorities, and management structures for implementation were also raised by multiple respondents.
- All respondents supported active participation by the public in implementation, stressing the need for information and education programmes (50%) enabling user groups/sectors to act.
- All respondents saw all stakeholders/users as important participants in the long-term management of RBDs. Two identified scientist/experts as important amongst others mentioned by individuals.
- Three respondents were willing to pay increased personal costs for implementation of the Directive, one was not, and one response was unclear.
- One respondent supported the 'polluter pays' principle, no other principles were mentioned.
- A range of different impacts was anticipated by respondents, including increased consciousness of personal water use (40%).
- A number of different activities were identified by individuals as requiring controls/restrictions, with excessive water use and flood plain developments each identified by two respondents as needing to be addressed.

Question 1. What water-related issues are of most concern to you?

A range of issues were identified by respondents. The aquatic environment was the focus of varied interests for three of the respondents, including habitat, loss of biodiversity, inadequate management of riparian zones and relationships with freshwater communities. (No interests in the marine environment were indicated.) These questionnaires also listed concerns in relation to water resource (availability, supply and use), and to pollution (eutrophication, organic pollution and diffuse pollution and waste water treatment). One respondent was concerned with environmental management of water resources at all level, and whether a single model of water management was appropriate in all cases.

Two respondents were concerned with floods (including flood prevention) and drought. Land use change and the lack of "long-term data on freshwater system and lack of support of long term-research" were also mentioned by individuals.

Question 2. What do you think of the Water Framework Directive's new and potentially tough approach to protection and management of our water resources? Why?

All respondents were supportive of the WFD approach as appropriate to the use of a valuable resource, particularly identifying the catchment/ river basin approach and focus on biodiversity and ecosystems as the only way to ensure improvement and subsequent maintenance of water quality and the structure and function of aquatic ecosystems. This was further supported by the assertion that "past emphasis on chemical status has failed to protect surface waters from deterioration".

One respondent indicated that if a tough approach is necessary, it would be for a reason and the benefits will be there for everybody.

Question 3. What risks do you see with the proposed administrative arrangements for the implementation of the Water Framework Directive?

Four of the five respondents appear sceptical of the role of local authorities in the administrative arrangements. This is related to perceptions of "the poor record of these authorities in dealing with water problems", the risk of poor enforcement on the basis of past experience, "little evidence of the relevant authorities seeking advice and involvement of sufficient numbers of relevant academic scientists and researchers", and the need for additional staff in an already overburdened structure which may not be 100% committed to this role. One respondent posed a number of questions about the choice of 'lead' authorities and their roles, and another identified the "co-ordination of competent authorities to manage RBDs (monitor, quantify pressures, transfer data)" as a concern. The training and education of officers involved within local authorities was also raised.

One respondent identified fears over inadequate use of "national and international expertise in the area of freshwater ecosystem ecology, thus the process could lack credibility and inappropriate plans could be developed. Involving only or largely NGOs and a couple of scientist will not suffice to ensure that the full objective scientific information is brought to bear in the overall implementation process".

Question 4. How do you think that individuals, organisations and community groups can get involved in the preparation and implementation of the River Basin Management Plans?

Half the respondents refer to the importance of education and awareness; raising amongst the wider public, with suggestions for a 'Tidy Towns' type competition and specific programmes for water users (farmers, fishermen, recreationalists, etc.) to assist them to minimise their impacts on water bodies. It was felt that money invested in this was worthwhile and would motivate people to become involved.

One respondent was clear that information provision and seeking comments was not

enough and that stakeholders had to be involved in the planning and implementation of the Directive. Another expanded on this stressing the importance of expertise in the process: "RBD Management Committees should be established which encompass the regulators, the users and the appropriate academic scientists and researchers. This is the experience from the USA and elsewhere. Reliance on the regulators and community groups/NGOs is not sufficient, as the objective scientific knowledge must be incorporated into any management plans." A preference for the active participation of the public was reflected across all respondents, with one answer proposing that the public "be directly involved in developing models of best practice for water management at local level".

Question 5. Who should be involved in the long-term management of the River Basin Districts?

All five respondents were clear that all stakeholders should be represented in long-term RBD management. It was acknowledged that this was not an easy thing to achieve and suggestions were made that special boards might be established and that the lead authority could undertake a specific liaison role. In connection with this it was noted that "if people are to be charged for water then there should be finances available to pay for adequate and responsible management".

The need to involve appropriate scientific and other experts was mentioned, as were the following agencies: Environmental Protection Agency, the Wildlife Sections of the Dept. of the Environment, local authorities, regional fisheries boards, the Marine Institute, Geological Survey of Ireland and the Heritage Council.

Question 6+7. Would you be willing to accept an increased personal cost for implementation of the Directive? If not, how should its costs be met?

Three respondents were willing to accept increased personal costs for implementation, although two qualified this support with one stating that "only through developing a real economic basis to water use and a cost to its abuse will WFD outputs be achieved", and another that additional costs were acceptable "only if such costs were directly related to improved water quality, ... only if such charges were transparently accounted for [and] only if such policy was NOT transposed on developing countries through for example EU development aid conditions". It was felt that charges should be relative to usage. One respondent stressed that the 'polluter pays' principle must be actively enforced.

Only one respondent stated that they were not willing to accept an increased personal cost for implementation of the Directive, believing that funding should come from general taxation.

Question 8. How might implementation of the Directive affect your own activities?

One respondent did not feel that the Directive had any implications for their own activities, while another stated that it was not possible to anticipate likely effects at this stage. Two answers indicated that the Directive would make the respondents more conscious of their own use of water and waste generation, and that increased costs would affect their activities. One of these responses also stated that "it would make me happy to

know future generations of Irish people can depend on sustainable use of water as a resource". The fifth respondent stated that the Directive would cause them to "adjust educational courses on aquatic legislation".

Question 9. What other human activities should be controlled or restricted in the interests of achieving the aims of the Directive?

Two respondents referred to floodplain development and flood alleviation schemes (particularly the creation of drainage systems feeding directly into channels and excessive creation of concrete ground cover). Two also raised the issue of excessive water consumption.

One respondent referred to all activities impacting on receiving water bodies, while another indicated that significant activities should emerge from preliminary consultations and participatory planning. The management of riparian zones, and fisheries guidelines that involve removal of woody debris were also mentioned. Urban and industrial planning and development were identified by a single respondent.

8.7 Environmental NGOs

There were fifteen responses from environmental NGOs. These ranged from groups that were specifically focused on particular species or types of natural environment, through those with specific geographic focus (such as on a particular water body) and nationally focused environmental groups.

Overall Summary of Responses:

- 15 responses (11.7%total)
- Concerns over habitat, pollution, waste disposal and water supply were each mentioned by over 40% of respondents
- Over 70% expressed clear support for the WFD, 2 respondents found it flawed, and 2 did not give clear answers.
- 75% saw risks associated with the practical implementation of the directive. 50% of respondents identified inadequate resources as a risk to implementation (with a similar number stressing the need for resources for NGO and public involvement). Over half the answers to this question pointed to problems with the credibility of local authorities, and inadequate enforcement. Failure to fully integrate stakeholders and NGOs, and lack of political will were seen as major challenges to implementation by over a third of respondents.
- A variety of ways to get the public involved in implementation were proposed. Over half respondents stressed the need for confirmation of an open and fair process for participation, over a third identified the need to acknowledge the positive contribution the public could make, and support and resources as necessary to for them to get involved. Multiple respondents identified the need for widespread awareness raising and information availability.

- Over three-quarters of respondents referred to all/ all stakeholders/ interested parties as important to be involved in the long-term management of the RBDs. Just under 50% named local authorities. A wide range of specific agencies and interest groups were also mentioned.
- 50% of respondents were prepared to pay increased personal costs for implementation, nearly 30% of answers were not clear, and just over 20% of respondents were not willing to pay more.
- Just under half the respondents expressed support for the 'polluter pays' principle, with one also upholding the need to recover costs of water supply.
- Two-thirds of respondents saw implementation of the Directive as affecting the work of their NGO, increasing workloads and resource requirements, and to a lesser extent assisting them achieve some of their own objectives. Two-thirds also identify positive environmental benefits from successful implementation.
- Waste disposal (incl. sewage and landfill activities, etc.) were the most frequently cited activity perceived as requiring control/restriction (over 65% of respondents). Over 33% identified water supply issues as important. A wide range of other activities was also listed.
- Nearly 30% of respondents identified the need for an independent, national body to oversee implementation of the Directive, or at a minimum the establishment of dedicated sections and officers within local authorities.

Question 1. What water-related issues are of most concern to you?

A very extensive range of water-related issues was identified as of concern to these groups. Four main themes were distinguishable. These included the loss and deterioration of habitat, pollution and waste disposal, water supply issues, and a range of specific activities perceived as presenting problems.

Concerns over habitat included drainage of wetlands and peat harvesting, habitat fragmentation and pollution related changes such as eutrophication. Modifications to rivers and streams, and development in floodplains and coastal areas were cited as problems, and lack of information on the impact of water quality and factors such as fluoridation on wildlife and, in turn, of other landscape elements on water quality was also referred to.

Pollution and waste disposal concerns were also wide-ranging, taking into account run-off and seepage from agricultural pollution, the operation of sewage treatment plants, road drainage, chemical pollutants and medical waste. Household waste and the design and location of landfill sites were also mentioned.

Controls over water use (presently seen as unsustainable), and pricing for water supplies in addition to issues of quality and quantity, were seen as important by two-thirds of respondents.

One quarter of responses referred specifically to wetlands and the need to protect these. A similar proportion cited concerns about pollution of groundwaters.

Specific activities that were identified as causing concern included; forestry, aquaculture, construction, abstraction, drainage, and agriculture.

Several responses clearly expressed desires to achieve a sustainable ecological approach to water resources and associated environments such as wetland areas, specifically supporting the aim of 'good ecological status' for Irish waters.

In two cases awareness raising and participation in the process of implementing the Directive were referred to.

Question 2. What do you think of the Water Framework Directive's new and potentially tough approach to protection and management of our water resources?

Why?

Over 70% of answers to this question expressed clear support for the active enforcement of the Directive, and the use of a water basin/ catchment approach. It was widely felt that this was a key opportunity for "integrated approach to use and management of water resources". However, amongst these expressions of support, a majority also identified difficulties with the Directive. A range of specific criticisms were expressed:

- "Involves a top-down approach"
- "Lacks any real consultation"
- "Poor identification of stakeholders and consumers"
- "Inadequate representation in too tight a time frame"
- "Unjust and inequitable, in effect an amnesty for polluters of the past and present and won't take retrospective action against these, thus securing payment for remedial measures"

There was also strong feeling amongst a majority of respondents that lessons should be learnt from past experience of unsatisfactory implementation of EU Directives in Ireland. The need for concerted political commitment to the Directive and the importance of not allowing this to become diluted was noted. Some serious doubts about the likelihood of this were noted: "[the Directive] appears doomed to failure in Ireland - where the authorities have heretofore had such a great propensity for looking for and finding a way out of their obligations when it comes to tackling the water pollution issues of the country, there is little doubt but that despite the best intentions of the WFD they will seek derogations and postponement of deadlines to such an extent that the legislation will (like an abundance of similar legislation of both national and EU origins) become useless". "In order to be a success the WFD will need rigid and stringent penalties against states who do not honestly and comprehensively comply with its overgenerous deadlines." One respondent noted "many of the local councils involved are serious polluters themselves".

Two respondents pointed to the fact that adequate "funding/resources [are] necessary if [the WFD is] to be effective", and one that there would be need for agreement on the timeframe of agreed actions.

Question 3. What risks do you see with the proposed administrative arrangements for the implementation of the Water Framework Directive?

Answers to this question to a large extent reflected and expanded on those given under question 2.

Three quarters of respondents saw risks in how practical implementation would be undertaken; a likelihood of excessive bureaucracy, a lack of political will to implement laws, inadequate finance and staffing amongst all participating agencies, a lack of river basin data, and probable delays or weakened implementation through the influence of lobby or pressure groups. Several respondents noted a need for adequate resources and clear legal support of enforcement, in order to avoid the Directive being subject to political and financial pressures. There was a perception a perception that "without such commitment from government the WFD will be 'demonised' as other measures such as Special Areas of Conservation have been."

A strong theme to emerge amongst a majority of the respondents concerned perceived problems with local authorities. These included the fact they local authorities may be polluters themselves, that they are slow to respond, reluctant to enforce existing regulations, and lack credibility, skills and resources to successfully undertake their proposed role. One respondent stated that there is a "need for water officers in Local Authorities, and no core department/ person taking responsibility will lead to lack of cohesion (if no new agency to be established)".

Two further more minor themes emerged amongst a significant minority of respondents. The first highlighted the large size and cross-boundary nature of the RBDs and associated risks, namely that there may be delays in dealing with pollution incidents where effects are felt in areas under different authorities, and that particular waters within RBDs may be left low on the priority list.

The second theme related to proposals for the participation of the public. It was felt that the proposed arrangements reflected a "poor representation of consumers in too tight a time frame", that the consultative process is poorly resourced "which can only result in poor representation of stakeholders", and that there is a "lack of skills and resources in local authorities to educate and involved local communities in the process". One respondent felt that "lack of integration of environmental NGOs in planning committees being set up now, and large contracts given to established consultants to inform the public, do[es] not auger well for an innovative approach - this is effectively the risk of business as usual with an extra layer of administration". However, this was matched by queries about "the 'all inclusiveness' of the admin arrangements for the implementation of the WFD, the process will b much too cumbersome to make progress in time frame". It was felt that implementation "may flounder as [it] includes so many groups, or fail to meet own deadlines". A lack of transparent decision-making was seen as a risk, and a formal mechanism for accepting and incorporating stakeholder input was felt to be necessary. One respondent felt it likely that NGO input would be ignored.

Question 4. How do you think that individuals, organisations and community groups can get involved in the preparation and implementation of the River Basin Management Plans?

A point brought out by over half the respondents concerned how implementation was carried out; indicating that it needed to be open and inclusive, adequate and equal, allowing time for the public to become familiar with participation and overcome cynicism and some poor experience from past public participation initiatives. It was advocated that the public be able to participate in the process and in its design, but it was noted by two respondents that no one group should have more power within the process due to access to greater resources or links with government, or be able to dilute or delay implementation.

Over a third of responses stressed the need for systems that made full use of the expertise and knowledge of community groups and other organisations. A similar proportion advocated balanced representation of all interests in the implementation of the Directive, with other suggestions including a water ombudsman, networks and national regulation.

One third of the responses to this question highlighted the need for adequate resources to enable the public to get involved in the preparation and implementation of the RBD Management Plans.

A wide range of methods for engaging the public in the process was identified. These included:

- open forums
- conferences
- public meetings
- consultative documents
- PR campaign
- use of all types of media
- seminars
- education initiatives

There was some suggestion from a minority that interest groups could participate more actively, and in more innovative ways, in implementation: carrying out monitoring functions, and providing voluntary help, particularly where they have access to specific expertise, experience and an appropriate focus of interest. The potential for this needs to be recognised.

Question 5. Who should be involved in the long-term management of the River Basin District?

As might have been anticipated, responses to this question were dominated by reference to a broad group of non-government stakeholders (11 of 14 respondents). These included environmental NGOs, recreational water users, landowners, consumer representatives, or umbrella groups for these distinct areas of interest. "Without support of all these groups the long term goals of the Directive cannot be met - or will be met but at a much greater cost in terms of time & resources". One respondent proposed that "each RBD needs to evolve into a truly democratic 'water parliament' - if we can set up these structures we will be on the road to achieving our goals for 2015".

Three activities were specifically mentioned in particular as important to be involved these were agriculture, angling and industry. However, one respondent commented that "as [implementation of the Directive is] evolving IFA & IBEC seem over-represented".

Just under half the responses expressed the view that local and/or central government should be involved in long-term RBD management. (One respondent did not want local authorities involved in order to avoid the involvement of local politicians.) A small minority of respondents also mentioned the Regional Fisheries Boards and Dúchas. In two cases an independent overseeing body was proposed, possibly like the National Rivers Authority in England. Other agencies mentioned in individual questionnaires included the Environmental Protection Agency, Coillte, Teagasc, and health representatives. Two respondents stressed the need for technical advice on specific areas of work undertaken as part of implementing the Directive, and to ensure that those involved included well-rounded scientist or groups of scientists who understood both biological and physical aspects of catchment management.

A third of respondents wished to include 'all' relevant parties in RBD management.

Question 6+7. Would you be willing to accept an increased personal cost for implementation of the Directive? If not, how should its costs be met?

Half the respondents in this group indicated that they would be prepared to accept increased personal costs for implementation. Similarly, just under half the respondents supported the principle of 'the polluter pays'. It was clear that these respondents favoured a sliding scale of charges; increasing with severity of pollution, or extent of water use, and felt that social considerations needed to be taken into account in charging mechanisms. In several of these cases it was apparent that the 'polluter pays' principle was perceived as relating to industry and other activities rather than to individuals or domestic consumption.

In five cases the answers did not make clear whether the respondent was personally prepared to pay increased costs for implementation, and while some expressed support for the 'polluter pays' principle, it was impossible to be clear whether their own use was considered as pollution.

Two respondents answered "No" to the question, one indicating that "only after human rights and protection of ordinary citizens rights are enshrined, should costs be added", and the other expressing the view that anglers contributed enough already and invest in many ways in protection of water resources.

Question 8. How might implementation of the Directive affect your own activities?

Two main themes dominate responses to question 8.

Two-thirds of respondents saw it affecting the work of their NGO; increasing and in some cases shaping workloads, requiring additional resources and increased liaison with membership, and potentially affecting their ability to work in other areas of importance. In a minority of cases, successful implementation was seen as assisting the NGO to achieve

some of its aims. It was also anticipated to lead to work in monitoring the effectiveness of the Directive and its implementation, and require establishment of mechanisms to feed into RBD structures.

A similar proportion of responses saw positive benefits in relation to environmental impacts on a range of habitats and wildlife, with associated benefits for some recreation pursuits, and more reliable water supply.

One respondent said that they had 'no idea' how the Directive might affect their own activities.

Question 9. What other human activities should be controlled or restricted in the interests of achieving the aims of the Directive?

Waste disposal activities were identified by two-thirds of respondents as requiring controls or restrictions. Included in these were septic tanks, sewage treatment systems, sewage discharges from boats and pollution from boat engines.

Less than 20% of responses referred to agricultural activities including; slurry spreading, fertiliser inputs, herbicide and pesticide use, stocking levels and disposal of surplus milk production (by co-operatives).

In a third of cases water supply systems were cited; wells (including on de-commissioning), group water schemes, and large-scale extraction, and a similar number felt that activities with potential to damage water resources should be considered.

Two responses were concerned with the introduction of exotic species rather than efforts to re-establish native flora and fauna.

Individual respondents raised concerns over airborne pollution, the use of domestic detergents, tourism, land reclamation, peat cutting, forestry, and all activities affecting rivers, lakes and groundwaters and their functioning as ecosystems. One respondent proposed that "WFD 'proofing' of all politicians' decisions would have the greatest impact in the short term".

8.8 Individuals

Twelve completed questionnaires were received from individuals, and one detailed letter of response. In three cases the issue of water quality was significant in relation to their work. However, these respondents made clear that the questionnaire responses were made as individuals. A very varied range of interests in water issues was expressed. These included ownership of wells and/or septic tanks, concerns over drinking water and public health, environmental or ecological interests, residential location, wetland systems and water based transport and recreation.

Overall Summary of Responses:

- 12 responses were received from individuals (10% of total)

- 80% of respondents had concerns over water quality (50% over water for consumption), 33% identified pollution concerns and 25% sewage and waste treatment and disposal.
- In 50% of cases it was not clear whether the respondent supported the WFD, over 40% expressed clear support, while one respondent was clearly opposed to the Directive.
- A range of possible risks was seen in the proposed administrative arrangements by half the respondents. Those mentioned included problems of excessive bureaucracy and red tape, inadequate resources, lack of enforcement, and a lack of credibility on the part of local authorities. Half also identified issues relating to public participation.
- A very wide range of ways of involving the public in implementation were identified in the questionnaires, with a third proposing increased information and education provision and also that active contributions to implementation be sought from the public.
- Over 40% of answers proposed all stakeholders should be involved in the long term management of RBDs, and 25% also cited local authorities as important.
- Over 60% of respondents were willing to pay increased personal costs for implementation, over 10% were unwilling and 25% were not clear in their response.
- Only one respondent made specific reference to the principles referred to in the Directive, suggesting that while these were laudable in theory, they would prove difficult to deliver.
- 25% of respondents did not answer this question, while 25% saw a range of positive benefits as likely.
- Sewage treatment (33%), development/planning (33%), and agriculture (25%) were the three most cited activities respondents saw as needing controls/ restrictions.

Question 1. What water-related issues are of most concern to you?

Half the respondents identified the quality of water for consumption as an issue of concern. A further third listed more general concerns for water quality and the ecological quality of water.

A third of respondents were worried by pollution of water, with a variety of potential sources identified, and 25% of answers indicated concerns related to sewage and wastewater treatment and disposal, including from farms, businesses, homes and campsites.

Other concerns expressed by individuals involved broader issues: a lack of value placed on water itself and on wetlands, landscape heritage issues, the over development of shorelines of water bodies, transport by sea and inland waterways, and recreation. Respondents were concerned about the wasteful use of water, and inadequacies in the present system for addressing water-related problems.

There was also concern over lack of current available information on water supplies.

Question 2. What do you think of the Water Framework Directive's new and potentially tough approach to protection and management of our water resources? Why?

Just over 40% of respondents in this group expressed clear support for the WFD, believing it "excellent", "long overdue" and "necessary". Support was expressed for the 'polluter pays principle', the 'integrated nature of the Directive', and it was felt that the proposals were improvements on existing arrangements.

Half the respondents were cynical about what could actually be achieved, with a clear feeling that the success of the Directive hinges on political commitment and enforcement. One respondent felt that "poor enforcement, derisory fines and little proactive measures have been taken by successive governments" in this area, and another supported the principles underlying the Directive but suggested that they had "yet to see them working in other areas of environmental protection".

Two particular difficulties were identified with the proposed approach in several answers, namely that it "requires a level of co-ordination that will be tough for existing structures to meet", and that "it is difficult to foresee implementation to the letter, while working on consensus/ relying on good will of a multitude of stakeholders".

In relation to the principles adopted in the Directive, one recipient pointed to the need for "a belief amongst government and implementers that they are important, [otherwise] they will fail to have effect". Two referred to resourcing issues: indicating that "cost recovery is essential if we are to face our responsibilities of environmental protection" and that "if the plan is implemented and funded and manned sufficiently, it will be a great start".

Question 3. What risks do you see with the proposed administrative arrangements for the implementation of the Water Framework Directive?

Existing structures were identified by half of the respondents as posing potential risks in the proposed administrative arrangements:

- cynicism about the role of local authorities was expressed, suffering from a lack of public credibility, not being entirely transparent in their operation, and one respondent saw them as "polluting as much as anyone";
- others identified the need for better data management systems and for additional necessary funding and manpower;
- very specific views on internal administrative challenges were expressed by one respondent: "changes are needed to improve integration of environmental issues into planning and policy and improved co-ordination of existing relevant work areas at local and national level is essential - Currently the four main work areas that relate to water quality - namely 'Water Quality, Sustainable Development, Water Supply and Conservation, and Participation/Community involvement are dealt with under different sections and directors in Local Authorities. Co-ordination of relevant work areas, not only on a local authority basis but also on a RBD basis will be a challenge"

- apparent lack of overall accountability by any government body, and inadequate authority of the EPA over local authorities, were seen to imply gaps in the system of implementation;
- a potential "risk of bureaucracy and red tape hindering the process" of implementation was also repeatedly mentioned.

Half the responses also raised issues of public participation and reaction to the Directive. The risk that the interested public might not be actively involved in the process was raised. The overall lack of public education on the WFD, and consequent lack of public support for the Directive were clearly identified as problems for implementation. The apparent expectation of/ reliance on goodwill and consensus was realistic was queried as a realistic assumption, and it was stated that government usually fails to listen to public input when it is made. It was also suggested that local opposition might also present a problem.

One response discussed at length a number of macro-scale factors that were perceived as underlying water quality deterioration directly or indirectly, including the World Trade Organisation, and indicated that unless these were addressed the WFD could not achieve its objectives.

Question 4. How do you think that individuals, organisations and community groups can get involved in the preparation and implementation of the River Basin Management Plans?

The use of a range of potential means to involve individuals, organisation and community groups were proposed by respondents, including all types of media, public meetings, and direct contact with water user groups.

The need for information and education was stressed both explicitly and implicitly in a majority of responses. Four responses highlighted the potential contribution of non-governmental actors to the process; "individuals and other user groups are often eyes and ears of river systems and also have most to lose, in many cases. As a lobby [they] can reflect expectations without financial/organisational concerns." It was proposed that "water users should be involved to advise Management Bodies. i.e. fishing associations, Boat Hire assoc. Sailing clubs, farm bodies, etc. Inland waterways assoc."

Two respondents made proposals relating to administrative structures in this context, One suggested "enhancing the role of the Community and Enterprise Section of local authorities to include, as a priority development of participation aspects of the WFD and helping the coordination of the WFD key work areas of local authorities would be a useful starting place. The Community and Enterprise Sections in local authorities are doing good work in involvement of community groups, state agencies, etc. - perhaps their role could be examined/expanded and a designated WFD person appointed. Training in aspects of participation and the use of trained facilitators would also be useful to ensure real participation." A second proposed that "local authorities ought to endow themselves with water policy committees a number of whose members should be by law associated with the [River Basin Management] plans".

One respondent was adamant that "as long as the Council/ corporation rule, no individual can have a say".

Questions 5. Who should be involved in the long-term management of the River Basin Districts?

Over 50% of answers to this question indicated that the public, interest groups and NGOs should be involved in the long term management of the RBDs. Broad groups identified included environmental NGOs, community and local residents' groups, and "locally based groups - not big bodies because they pass the buck from one office to another".

A quarter of respondents stated that local authorities should be involved, with one making detailed comment on internal structures:

"Structures are in place at local level in four key areas and if enhanced these could be co-ordinated at RBD and Department Level to ensure successful implementation of the Water Framework Directive.

The four KEY WORK AREAS of Local Authorities dealing with KEY ISSUES relating to the WFD to some extent and with or without KEY DESIGNATED PERSON are as follows:

Development Control and Planning - Key Issue **Sustainable development;**

Community and Enterprise - Key Issue **Participation of community, agencies, etc.;**

Environmental Protection - Key Issue **Water Quality and Biodiversity;**

Water Services - Key Issue **Water supply, water conservation.**

To improve performance and co-ordination there needs to be a KEY DESIGNATED PERSON (with formal training and experience in WFD issues in each work area).

The issues of relevant training and experience is very important, currently many persons qualified to degree and higher level in the area of Environmental Science and related disciplines are effectively excluded from professional posts and management posts in Local Authorities, A weakness in the local authority system, , as identified in the document – Better Local Government, was the need for expertise to deal with complex environmental issues.

Environmental Protection work needs trained and experienced staff.

The Local Authorities differ from the Environment and Heritage Service in Northern Ireland in this way. The DoELG must ensure that Environment Sections are completely opened up to All Persons with Relevant Qualifications. The current practice of many local authority retaining all or most professional posts in Environment Sections for Engineering graduates (mostly Civil engineers) should end.

Local Authority Environment Sections should remodel themselves on the EHS system, EPA or similar and introduced trained Heritage Officers to Planning Sections."

The Food Safety Authority of Ireland was mentioned as having an important role to play in educating the public and 'selling them the need for the Directive'.

Other respondents indicated the need to involve those with extensive experience in all aspects of water use, and to work as a partnership which would need to be led and to have clear achievable goals.

Question 6+7. Would you be willing to accept an increased personal cost for implementation of the Directive? If not, how should its costs be met?

Seven of the twelve respondents were willing to accept an increased personal cost for implementation of the Directive. Four of these qualified their acceptance, indicating that rates would need to be reasonable and "management effective and value for money". One respondent felt that "payment would help a more responsible attitude to use of water" and another asserted "water rates are to be recommended with a balanced reduction in taxes to allow implementation and safe-guards for the socially disadvantaged". It was also mentioned that costs could be covered by profits that the Directive would bring. This comment was apparently based on the application of the 'polluter pays' principle, which was supported by two respondents, one of whom made clear that this should be the basis for calculating personal/domestic charges.

Two respondents were unwilling to accept additional personal costs. In one instance the respondent was unhappy to provide additional funding "until government cuts spending on silly studies, overlapping agencies, endless reports on the obvious - more, much more transparency [is needed]". One felt very strongly that "... for 35 years we are getting recycled sewerage and thanks to government our lakes and rivers are polluted because political parties get big donations from the main polluters. We are very small fry with no say".

Question 8. How might implementation of the Directive affect your own activities?

In a quarter of the questionnaires this question was unanswered, which might be interpreted as meaning that the respondents anticipated no affect of the Directive on their own activities or were uncertain of what these might be, as indicated by one respondent who stated that the impacts would "depend on what is implemented". One respondent was certain that there would be no impact on their own activities.

One respondent indicated that the Directive would "enhance and protect my interests in the safeguarding of all types of water - river, estuarine, lake, ground, etc", and another noted that "improved quality of water would enable me to drink local water with confidence I don't have at present". In one answer a "higher cost for safe drinking water" was anticipated.

The Directive was likely to assist in the development of ecotourism in the eyes of one respondent, and another indicated that they would take an active interest in its implementation.

Question 9. What other human activities should be controlled or restricted in the interests of achieving the aims of the Directive?

The activities cited by most respondents under this question was sewage and waste water

treatment and disposal, and planning and development issues (each listed in 33% of questionnaires). 25% of respondents identified agricultural activities as needing controls or restrictions. Particular concerns about developments along flood plains, and river and lake sides were raised. One respondent proposed that "septic tank users be circulated to advise how to maintain septic tanks, by their local authorities to prevent pollution of waterways". Industry and forestry were both mentioned by two respondents.

One respondent suggested that it is important to "think less of controls and restrictions and more about problem solving".

A number of other activities were identified as needing control or restrictions in the interests of achieving the aims of the Directive:

- Boat waste/ sewage storage facilities
- Use of reed beds
- Local authorities' activities
- Water abstraction
- Leisure pursuits
- Motor transport
- Military activities
- power boat use on canals/river/sea

8.9 Local Authorities

Eighteen completed questionnaires were received under this category. Of these 15 were from county councils (with 4 responses from different individuals within 1 council), 2 were from city councils, and one was from a town council. It was not possible in all cases to be sure of the position of the individual within the authority, but the following posts were represented amongst the responses: Director of Service (Environment), Senior Engineer (Environmental Services), Heritage Officer, Senior Engineer with responsibility for River Basin District, Engineer (Environment). In nearly half the cases, it was made clear that the answers were returned by the individual concerned and not on behalf of the authority. It is not possible to be certain in the other cases that the response was made on behalf of the authority concerned.

Respondents identified interests that reflected the various areas of responsibility of local authorities.

Overall Summary of Responses:

- 18 responses (14.2% of total)
- Over 75% of respondents identified concerns over water quality for human consumption, over 55% raised concerns related to pollution and over 20% had worries relating to flooding.
- 75% of respondents supported the WFD, the remaining 25% were non-committal
- Problems of inadequate resources, and difficulties associated with management structures were identified by over 55% of respondents as risks associated with the proposed administrative set-up.

- Just under two-thirds of the questionnaires stressed the need for information and awareness raising in order to secure public involvement and support for the implementation of the Directive. A range of other mechanisms for actively engaging with the public were proposed.
- 80% of respondents saw stakeholders as important in the long-term management of RBDs, 50% named local authorities. Over 25% listed regional fisheries boards, the Environmental Protection Agency and agricultural interests, amongst a range of agencies and interests.
- Over 50% of respondents were willing to pay increased personal costs for implementation. A quarter were not clear on this issue, with the remaining respondents opposed to increased costs.
- In total over a third of the questionnaires mentioned (and supported) the 'polluter pays' principle. Neither of the other principles adopted in the Directive were referred to.
- Over 75% of questionnaires saw impacts in relation to their work, and 50% saw wider general impacts in behaviour.
- Waste disposal was the dominant area requiring controls, identified by 80% of respondents. Over 25% of replies named water supply and consumption as needing control. Planning and agriculture were also mentioned by several respondents.
- 25% of respondents favoured the establishment of a new national body to oversee implementation of the Directive.

Question 1. What water-related issues are of most concern to you?

Over 75% of respondents identified concerns related to quality of water for human consumption, but also of water bodies in general (surface, coastal, groundwater, etc.), the implementation of various water-quality related legislation, and locally specific recommendations. Two respondents also referred to the need to ensure the quantity of water to supply human consumption. Answers referred to a "lack of implemented policy on risk assessment of drinking water sources and source protection", and a lack of "[K]nowledge as to the consequences of various activities on water quality".

Ten answers (56%) raised issues relating to pollution of water including; diffuse pollution, "lack of phosphate reduction as a general policy on point source effluents from sewage treatment plants, untreated storm overflows at sewage treatment works", "pollution to water courses from poorly controlled development and run-off which adversely affects habitat", improperly sited and poorly managed septic tanks, problems of dumping and litter, and pollution of vulnerable areas (such as Karst environments). Other pollution concerns related to "agricultural activities, forestry, roads construction projects and urban surface run-off. [and] Spreadland issues of IPC and non-IPC licensed activities". A need for greater information and awareness was also identified to help address problems of accidental pollution.

Four respondents were concerned with flooding, nature conservation, use of wetlands,

aquatic life, (esp. salmonids) and biodiversity. Other issues raised included habitat protection, nature reserve management, recreation and tourism.

Resource requirements were mentioned by two respondents in relation to providing good quality water for drinking, for treatment of waste water, and for enforcement. One suggested that "it would be desirable that there should be a link between the volume of water used and the price paid for it by the consumer".

Question 2. What do you think of the Water Framework Directive's new and potentially tough approach to protection and management of our water resources? Why?

Three-quarters of all respondents welcomed the WFD's approach, identifying a range of positive aspects:

- It provides a well defined framework of objectives and timeframes;
- It brings all the legislation relevant to water under one heading;
- It provides an holistic/ integrated long-term approach to managing all water;
- It provides a logical procedure to address all the issues arising from attaining and maintaining good quality water;
- It is an extension of the current piecemeal approach, but in a co-ordinated integrated manner;
- It will serve to bring all monitoring agencies together and reduce duplication;
- It will build on the success of the Phosphorus regulations approach;
- Its emphasis on a catchment based approach and stakeholder involvement is good;
- It will concentrate people/polluters' minds and highlight the positive side of land use planning and development management;
- It is critical to redress the damage caused over the last 20-30 years;

Concerns were raised about whether the Directive would be fully implemented and the need for effective enforcement. One respondent noted that it will be costly to implement, and another that "[O]ut outs and derogations should be kept to a minimum". A third response stressed that "it is important for the long term protection and management of water resources that a system is in place whereby any long term proposals are realistic and can be continued even after the River Basin District Management Plans have been completed." It was acknowledged that "[T]ighter monitoring should improve water quality and provide data that can be used in other initiatives such as records for biodiversity plans".

Respondents made two proposals. One concerned the use of the 'polluter pays principle': "...the EPA, wildlife wardens and say community wardens should have greater powers and on the spot fines should be non-negotiable – 'polluter pays now and is named and shamed' must be the policy".

Another referred to facilitating compliance with legislation:

"...codified regulations could be developed to deal with many small scale and/or low risk polluting activities with the view that compliance with such codified regulations would be deemed as complying with xyz legislation. The clear advantage of such an approach is simplicity, which in turn facilitates effective compliance monitoring at reduced administration costs. Prosecutions following from a breach of such regulations would presumably be simpler and more effective which in turn would lead to a higher level of compliance. One could argue that such an approach would undoubtedly lead to inappropriate measures in certain instances - however, I believe the aggregate result would be acceptable and this scenario would be a vast improvement on current practice where due to the complexity of the law and cost of implementation /monitoring/enforcement and prosecution all but the largest polluters go unchecked. As an example of the above consider the approach taken for Nutrient Management Plans. Currently farmers required to produce a NMP must monitor phosphorous and nitrate levels allowing the calculation of appropriate levels of nutrient application depending on the crop etc. and taking into account other factors such as soil type, slope, and aquifer vulnerability. A considerable amount of subjectivity can be brought to bear on these parameters not least the choice of location for soil sampling. I suggest that an approach could be taken where the appropriate authority would set prescriptive nutrient application rates. An individual farmer in adhering to such rates of application would be deemed to comply with the law and in the event he wishes to make a case for higher spread rates, may elect to develop a NMP. This would allow a simplistic approach for a large number of small farmers where the cost of operating a bespoke NMP may be excessive."

Question 3. What risks do you see with the proposed administrative arrangements for the implementation of the Water Framework Directive?

Just over half the respondents identified fears that inadequate funding would lead to a failure to deliver implementation. This fear is clearly articulated by one respondent who explained that "in selecting local authorities as lead authorities to promote, establish and implement the new arrangements, if the RBM Plans are not resourced adequately, then it will not succeed. The wealth of current environmental legislation required to be implemented by Local Authorities is not adequately resource-based, [and this] restricts our ability to be effective and serves to undermine our credibility with the public as having the ability to do the job." For another, "[T]he proper administrative/implementation of the WFD by local authorities will require that adequate resources (financial and otherwise) are provided either directly by Central Government or alternatively by enabling Local Authorities to raise additional revenue income through appropriate fees/charges". Inadequate staffing was also cited.

Structural difficulties were also widely perceived. In several cases it was felt that the large size of the RBDs and range of different authorities and groups involved would result in difficulties "in co-ordination of administration between local authorities", and "in focusing

participants on the main goals for the RBD and thus delay implementation". It was apparent that "there may be a difficult transition for local authorities who are used to operating on a county basis rather than a regional one. Sharing the responsibility for past impacts on water quality will be a challenge". The complexity of the necessary administrative arrangements were seen as a significant risk by one respondent, with three expressing a preference for a sole remit authority because "operation of the WFD within Local Authorities will not be effective due to conflicting goals". One respondent expressed concern that implementation "may become overly bureaucratic and not focus enough on education of landowners and other relevant parties that can make a REAL input".

One respondent saw "involving the public in a meaningful way in the process" as a major challenge, while another perceived the involvement of stakeholders as risking delays to action due to vested interests they would bring to the process. As a result they saw a need for "empowerment of Catchment Management Committees".

The need for an all-island approach was recognised as important by one respondent, who stressed that North-South institutions must therefore be working and adequately resourced.

One respondent identified an essential need for training in conflict resolution and consensus-building techniques.

Reference was made to the pilot of the Shannon River Basin Management as an illustration of the risks in the proposed approach, although no details were given. The respondent did highlight the need to acknowledge that some species require superior quality water than human consumers do.

Question 4. How do you think that individuals, organisations and community groups can get involved in the preparation and implementation of the River Basin Management Plans?

Just under two-thirds of respondents raised the need for information and awareness raising in order to secure public involvement and support for the implementation of the Directive. A variety of mechanisms for delivering this were identified; a national public awareness campaign, use of the media, information events (with use of carefully selected venues for information such as cattle marts), public meetings, a roadshow/ bus (for each RBD rather than the country as a whole), establishment of strong links between implementation bodies and local/community groups, farming groups and so forth. It was felt important to demonstrate to the public "how seemingly small decisions or actions can, when taken cumulatively, have disastrous long term consequences". There was widespread support for the inclusion of the public as early as possible in the process.

Four respondents proposed that a stakeholder committee(s) be set up, with active participation within management structures within Catchment Management Groups/Boards. One respondent envisaged an established "public participation process – [with] written submissions, oral representations by elected members, involvement in Co. Development Board, Community and Voluntary Fora, Environmental Committees, {and}

encouragement of water projects in primary and secondary schools." A further suggestion proposed a "cross between a heritage forum and a planning-for-real type of set-up" as a good start.

In six cases respondents indicated that the onus was on individuals, organisations and community groups to engage in the process through deciding "what issues affect of are affected by the proposed RBD Management Plans in regard to their own particular area or occupation and making these known to the RBD Authorities", "by asking questions and just being interested", "by accepting all invitations from the Project Manager/Co-ordinator to contribute and by being fully aware of one's responsibilities and rights as a stakeholder", and "by responding to a draft outline of the RBM Plan".

One respondent saw strong public interest in the river basin approach and water quality as available to be tapped into, and one expressed the hope "that adequate means will be put in place to enable interest groups and members of the public to become involved".

The need to identify and engage landowners and other potential contributors to implementation was noted by one respondent and another highlighted the need to enhance a sense of "ownership of each catchment for its constituent communities by highlighting the interdependency of everybody's actions and their responsibility by their lack of response".

Question 5. Who should be involved in the long-term management of the River Basin District?

A group that might be referred to as non-governmental 'others' involving local community groups, user groups, NGOs (environmental and non-environmental) and "other stakeholders" was included in the list of those who should be involved in long term RBD management by 80% of respondents.

Fifty percent of responses stated that local authorities should be involved, with one respondent citing their strong links with the local community.

Over 25% of all respondents indicated that the Environmental Protection Agency, Regional Fisheries Boards, and farming organisations should take part, and the Departments of Agriculture and Food and of Environment and Local Government were each mentioned by two respondents.

A quarter of respondents were clear that a new national authority should be established to oversee implementation of the WFD in the long term.

A number of other agencies, groups and potentially individuals were also mentioned in individual answers:

- | | |
|---------------------------|---|
| • Marine Institute | • Dept. of Communications, Marine & Natural Resources |
| • Bord na Mona | • Dúchas Wildlife Rangers |
| • Waterways Ireland | • Geological Survey of Ireland |
| • Tourism representatives | • Navigation trusts |
| • Landowners | • Forestry |

Question 6+7. Would you be willing to accept an increased personal cost for implementation of the Directive? If not, how should its costs be met?

The majority (over 50%) who responded to this question indicated that they would be willing to accept an increased personal cost for implementation. (In one case the respondent answered "no" to the question, but supported the idea of charges for individual water use.) Half the respondents expressed clear support for the active enforcement of the 'polluter pays' principle. A third of respondents were clear that costs should be decided on the basis of use (consumption or pollution) with costs rising the greater the volumes used or the more serious the pollution. A feeling was expressed in one case that charging would need to be preceded by effective leakage reduction, efficiencies in water usage and supply, and awareness campaigns on water waste.

One respondent proposed that a fund [be] built up from revenues raised from polluters "which should go back into necessary monitoring equipment of environmental protectors to patrol waterways and towards education and training regarding water power".

In a third of cases it was unclear whether the respondent was prepared to accept additional personal cost, and in three instances respondents stated that funds should or would be made available from central government. One indicated that "existing budgets are inadequate to meet new requirements. New funding will have to be made available to local authorities", while another stressed that additional costs or charges would be a policy decision made at County Manager level.

Question 8. How might implementation of the Directive affect your own activities?

More than three-quarters of respondents saw impacts of implementation of the Directive on their work. They identified likely increases in their workload and in costs associated with the implementation, changes in work practice, and work involved in ensuring that the authorities themselves are fully compliant with the Directive and applying best practice. In one case a respondent indicated that "certain activities undertaken by the Council would take into consideration the recommendations of the relevant River Basin Management Plan, e.g. a water abstraction scheme for improved water supply (effect of water level variation), upgrading an existing wastewater treatment plant (effect of increased discharge on river), landfills (site construction, operation and remediation), road construction programmes, etc." This implies that the respondent does not see that meeting the WFD objectives will be a local authority's priority if it clashes with other interests, despite commitments to the EU.

One respondent envisaged that it "will allow better land use planning to make infrastructure costs of water treatment are more cost effective and environmentally friendly". (A diminished workload was only anticipated in one response, and this was in the event that a new water authority was established.) Four suggested that it might make their jobs easier in the longer term, and this applied not only to the provision of water supplies for consumption but also to heritage awareness, education, and policy promotion.

Half the answers to this question saw wider general impacts from implementation: increased enjoyment of natural resources; benefits to nature conservation and

biodiversity; decreased waste with reduced consumption of bottled water; and better quality of drinking water.

In one case, the respondent anticipated a severe impact on sewage discharge and waste water treatment, and saw potential for the Directive to limit industrial growth and job creation.

One respondent explained a potentially significant impact as the "Local Authority has statutory obligation to protect water quality. Increased stakeholder participation without accountability might affect [the] Local Authority".

Question 9. What other human activities should be controlled or restricted in the interests of achieving the aims of the Directive?

The majority (80%) of responses to this question concerned wastewater issues, particularly disposal. Septic tanks were the focus of several comments including a proposal that "a form of licensing could be introduced for septic tank treatment systems (currently exempt under the Water Pollution Control Acts except where there is direct discharge to surface waters)". Similarly, licensing of Local Authority treatment plants by the EPA would be beneficial. "What gets measured gets done and fines for non-compliant WWTP would focus minds when allocating budgets!" Wider waste disposal issues were also cited, including disposal of hazardous substances.

A fifth of respondents felt that water consumption needed controls, identifying a need to reduce waste and use levels (e.g. in toilets, with rainwater recycling, etc.), and introduce appropriate charges to do this.

Consumer behaviour was also mentioned by a significant number of respondents; "use of domestic washing powders and liquids need more information and greater availability of less harmful chemicals for use daily in homes through Ireland. Cost effective and better distribution of environmentally friendly products should be investigated and implemented".

Planning (esp. in riparian zones and flood plains), aquaculture, agricultural activities, were also mentioned by several respondents. Two respondents also cited the need to implement existing codes of good practice.

Individual respondents also mentioned a number of other activities:

- local authority activities
- lake/river side factories with poor safety/pollution records
- jet skis
- housing too close to riparian corridors
- forestry activities
- treatment / off loading areas for toilets on boats needed.
- fisheries activities
- introduction of alien species
- abstraction
- building and site development activities

8.10 Other statutory agencies and public bodies

Twenty-three responses to the questionnaire were received in this category. These included five health boards, three regional fisheries boards, two river basin district projects, two responses from Bord Iascaigh Mhara, one regional authority, one regional tourism authority, one Leader and one ADM company, the Environmental Protection Agency, the Food Safety Authority of Ireland, the Irish Naval Service, Waterways Ireland, the Dublin Docklands Development Authority, the Lough Neagh & Lower Bann Advisory Committees (Northern Ireland), and the National Parks and Wildlife Division of the Dept of Environment, Heritage and Local Government.

Where expressed, the range of interests expressed in water reflected the remit of the agency concerned.

One response was received from a borough council, which did not complete the questionnaire due to the imminent removal of water service functions from its control to the County Council at the end of 2003. ENFO (the government's public environmental information service) replied that it was not appropriate for them to complete the questionnaire as a section of the Dept. of Environment, Heritage and Local Government. Fáilte Ireland also replied indicating that they had taken over the merged function of Bord Fáilte (which had been sent the consultative document) and CERT, distinct from the All Ireland tourist board (Tourism Ireland), but did not respond to the questionnaire.

Overall Summary of Responses:

- 23 responses (18.3% of total)
- Over 60% of respondents were concerned with water quality, and two-thirds of these were specifically worried about domestic water supply. Over 40% listed concerns over pollution and over a third identified eutrophication concerns.
- Over 80% of respondents supported the WFD, the position of the remaining 20% was unclear.
- Three-quarters of respondents raised issues related to management structures as potential risks associated with the proposed administrative structures for implementation. Concerns over the adequacy of resources and the credibility of local authorities to act as competent authorities were raised in 25% of questionnaires.
- 40% supported the idea of formalised representation of the public in the planning and implementation of the Directive, amongst a range of other proposals for their involvement.
- Nearly 60% indicate that local authorities should be involved in long term management of RBDs. 50% of all respondents consider 'all stakeholders' should be involved, while the EPA and regional fisheries boards are mentioned by 33% of respondents.
- Over 50% indicated that they would accept increased personal costs for implementation; only one respondent was opposed to this. The remaining respondents did not answer the question or thought it not relevant.

- Just under 50% of responses indicated support for the application of the 'polluter pays' principle.
- Half the respondents saw the implementation of the Directive as affecting their own work, the majority in a positive manner, and over 20% envisaged generally improved water quality and amenities.
- Over 60% of respondents cited sewage and wastewater disposal as needed controls, 40% thought that agricultural activities should be further controlled and 25% listed planning and development activities.

Question 1. What water-related issues are of most concern to you?

Over 60% of respondents listed concerns about water quality, with nearly two-thirds of these specifically referring to the quality of drinking water.

Nine of the respondents mentioned particular concerns over pollution including from agricultural and domestic sources, nitrates in surface and groundwater, localised faecal contamination of groundwater, and associated risks of toxic blue-green algae.

Over a third identified eutrophication/ nutrient enrichment and fish kills as significant issues. A similar proportion expressed concern over aquatic habitats; their loss or degradation through excess vegetation (and water quality impacts on pH level, dissolved oxygen and carbon levels), associated siltation of spawning grounds, acidification and the impact of this on fish life, drainage, and the introduction of exotic species.

Issues relating specifically to water supply were mentioned in three questionnaires; in relation to conservation (leakage, etc.) and the need for regular monitoring for bacteriological and chemical quality. Linked to this was concern over the general quality of water mentioned by two respondents who particularly referred to the issue of sewage outfalls and safe water requirements for water-based sporting activities.

Other issues raised were concerns for adequate water quality for fisheries and aquaculture, over activities impacting on the marine environment (land or marine-based), control of development, and the need for education of the public in disposal of wastes.

Question 2. What do you think of the Water Framework Directive's new and potentially tough approach to protection and management of our water resources? Why?

Over 80% of those who answered this question welcomed the Directive, describing it as excellent and absolutely necessary. Particular support was expressed for the catchment and cross-sectoral approach adopted in the Directive, with "focusing on the preservation/restoration of the aquatic ecosystem per se rather than on the protection of specific uses asthe best approach to guaranteeing the exercise of the various uses of water in a sustainable manner". Several respondents echoed the sentiment that the Directive "encourages a more hands on approach by a community to preserve and manage our water". One respondent asserted that it represents "a real opportunity to address existing problems" and another saw it as "indirectly, support[ing] the fishing and aquaculture industries around the Irish coast".

A number of other comments were made identifying the need for adequate resources to implement the Directive, and for a real commitment in order to take tough decisions and ensure necessary enforcement. These concerns were reflected in a comment that 'potential' was a good word to use in relation to the Directive.

One concern was expressed in relation to the principle of 'recovery of costs of water supply' in response to this question: that "if any steps were taken to impose a charge for drinking water. Firstly such a charge might inhibit people from taking the optimal amount of water intake daily. Studies have shown that there is a relationship between people's income and their health. The imposition of an unnecessary charge for drinking water could have detrimental health effects, particularly for lower income groups".

Question 3. What risks do you see with the proposed administrative arrangements for the implementation of the Water Framework Directive?

Risks associated with management structures dominated the comments here (75% of risks identified). These included a range of queries: who has overall control and accountability for implementation? how is consistency in interpretation ensured?; is the necessary leadership ensured?; will implementation fully engage with stakeholders? Specific difficulties were also highlighted: the high level of co-ordination required and the multiple agencies/ interest involved pose a serious challenge; inadequate resources appear to be provided for stakeholder participation; and as the management groups contain such a wide variety of interested parties, there may be a tendency that decisions will be made to accommodate the lowest common denominator. Given that the areas under the jurisdiction of local authorities do not correspond to the RBD areas, suggestion was made in two questionnaires that the Regional Authorities, in conjunction with the EPA, should be given responsibility for producing the RBM Plans. The particular difficulties associated with the transboundary IRBDs was also noted. A fear was expressed that "the smaller catchments may not get adequate representation or appropriate consideration within the larger catchment [RBD]", and it was stressed that "during the implementation stage, care must be taken to engage fully with stakeholder groups and provide information in plain English."

A quarter of respondents indicated concerns regarding the role and credibility of local authorities in implementation. A potential conflict of interest was perceived by several respondents "between the development and monitoring role of local authorities"; "Local Authorities should have a role but not a primary role as they are firstly development agencies. An enforcement body must have no direct links with major developers." This was reflected in other statements suggesting that Local Authorities might experience a conflict of interests so that a situation emerges where potential "polluters [are] regulating and monitoring themselves", moreover it was argued that the proposed structure "... is asking the local authorities to police themselves - i.e. small town & villages throughout Ireland have inadequate sewage treatment facilities - cost being the excuse. Who forces the local authorities to comply?". Similarly, if Local Authorities are to be the competent bodies given responsibility for implementation, then difficulties were foreseen in ensuring their co-ordination in RBDs, so as to avoid problems such as the "lead local authority ...

not giv[ing] sufficient attention to areas beyond its own boundary". A 'secretariat' to undertake this function was proposed as a mechanism in response to this.

The need for additional administrative resources was identified by 25% of respondents, especially for those County Councils that are involved in two or possibly even three RBDs, as it was recognised that there will be a high cost in delivering implementation.

A fifth of respondents mentioned concerns that enforcement would not be actively and rigorously undertaken and that, as a result, implementation of the Directive would not be achieved.

A number of other concerns were mentioned. It was felt that new thinking will be required by all those involved and "clear guidelines should be issued to ensure that all organisations and stakeholders are aware of their respective roles"

Question 4. How do you think that individuals, organisations and community groups can get involved in the preparation and implementation of the River Basin Management Plans?

Some form of formalised representation of the public in both the planning and implementation of the Directive was supported by 40% of the answers to this question. Various possibilities for achieving this were suggested including the use of existing structures (Community Development Board – Community Fora/ CLAMS groups, etc.), specially established Networks or representative structures, localised groups or mini catchment management fora, or the co-option of NGO and community representatives onto River Basin Management Groups. The importance of active stakeholder participation was widely acknowledged, as in this statement: "...what is often over looked is the requirement by the public and stakeholders to understand their role in the implementation of the plan, as without their active participation and support the plan cannot work".

Responses in this group stressed the need for more widespread availability of "clear documentation", and for consultation to be "full and open". General suggestions highlighted the potential of developing education programmes on water quality and conservation issues, using the World Wide Web, consultative documents, meetings and action groups, and the need to invite groups with an apparent interest to participate.

One respondent indicated that they "would like to see Fishery Boards as the primary enforcers of the Directive. "Local Authorities are both polluters and are very slow to enforce sanctions or conditions on polluters. Anglers groups, and local community councils are more important than local authority politically oriented groups".

Question 5. Who should be involved in the long-term management of the River Basin District?

Thirteen of the twenty-two respondents (nearly 60%) stated that local authorities should be involved in long term management of RBDs, while 25% were clear that all relevant statutory bodies should be involved.

Half of the respondents felt that 'all stakeholders' should be represented in the long term management of the RBDs. Cross-sectoral consultative committees, or a split between executive and consultative tiers of management were also proposed to accommodate the large number of interested agencies and public whilst not inhibiting implementation.

A third of the answers listed the EPA and regional fisheries boards as being important in the long term management of the RBDs. One respondent felt that "[F]isheries boards and local community groups rather than direct state vested interests" should be involved.

Coillte, the health boards, Dúchas, Teagasc and the Dept. of Environment and Local Government were each mentioned by several respondents. A range of other statutory and non-statutory bodies were identified by individuals including: the Dept. of Agriculture; the Dept. of Communications, Marine and Natural Resources; Geological Survey of Ireland; ESB; Office of Public Works; CLAMS and inshore fishery boards; agricultural interests; local community and tourism groups; the National Federation of Group Water Schemes; and public NGOs.

Question 6+7. Would you be willing to accept an increased personal cost for implementation of the Directive? If not, how should its costs be met?

Over 50% of the respondents who answered this question expressed a willingness to accept increased personal cost for implementation of the Directive. However, over half of these qualified their answer, explaining that additional costs would be acceptable if they were reasonable, the finances raised were effectively targeted and efficiently administered, the charges were calculated on a use-based/ pro-rata basis, and the principle of the 'polluter pays' was actively enforced with the courts applying proper sanctions in the event of convictions. In two cases it was felt that additional costs should be minimal; one respondent anticipated that "if we all conserve and protect then costs will be small", and another thought that "within reason any management function will undoubtedly give some additional costs but this should be the minimum as the co-ordination could be done on a share basis between the various public and local authorities with existing staff".

The other respondents in this group, who did not indicate that they would be willing to accept an increased personal cost, either expressed no view (30%) or indicated that the question was not relevant for them to answer. One expressed the opinion that widespread negative reaction to this in the past implied that it would be very difficult to generate the revenue required by direct charging of domestic consumers and that continued subvention from central government was likely to cover at least some of the costs.

There was a general sentiment that costs associated with commercial water use should be paid for by the relevant users.

Two strong points were made about how society values water resources. One respondent asserted that "to truly value a resource we have to feel we are paying for it. At present we believe there is no cost to the management and supply of our water. It must be made clear that there is an economic cost to the provision of water and the maintenance of catchment areas". A second complimentary idea was expressed by another respondent "The goods and service arising out of water usage should not be free. The consequent

environmental damage is a non-market value cost that is being borne by future generations and is currently not adequately considered in decision-making mechanisms. The clear association of additional costs for the implementation of the Directive should be communicated in a manner that clearly articulates why such costs are necessary. Policy options that explore the area of choice in terms of the cost burden are outdated and inappropriate."

Question 8. How might implementation of the Directive affect your own activities?

Half of all respondents in this group saw impacts on their own work as a result of implementation of the WFD. The majority of these anticipated that it would enhance the opportunities for them to deliver their own work objectives, while almost half of them expected it would contribute to an increased workload, two respondents anticipated that their agencies would have a role in implementation of the Directive (one in enforcement). One respondent stated that implementation would require a review of their agencies' internal activities to ensure compliance with the Directive.

Enhanced amenities and safe water supplies were also seen as generally experienced results of implementation. One answer indicated that additional costs resulting from implementation of the Directive would be experienced by tourism enterprises with which the agency concerned works.

Two of the responses are from agencies whose purpose is the implementation of the Directive, and a further two agencies are already involved in related work.

Question 9. What other human activities should be controlled or restricted in the interests of achieving the aims of the Directive?

The majority of respondents (over 60%) identified sewage and wastewater disposal as needing control. Included in this area were domestic and municipal treatment and disposal facilities, and facilities related to recreational boat use.

Agricultural activities should be controlled in order to achieve the aims of the Directive according to 40% of respondents in this group. Nutrient run-off, livestock density/stocking rates, timing of slurry spreading were all mentioned in relation to this activity.

Almost a quarter of respondents referred to the need for increased control of planning and development, particularly along watercourses/ waterbodies. A slightly lesser number also raised concerns that over extraction (abstraction) of water should be controlled.

A number of other activities were also mentioned:

- Household cleaning agents (particularly in relation to phosphate contents)
- Waste discharges by shipping
- Leakage from local authority water supply networks
- Licensing and monitoring of discharges
- Dumping

- Fisheries activities

Two respondents proposed that all human activities should be considered, one specifying those "that in some way seek to achieve a market value from the use of water at the expense of non-market value costings".

8.11 Professional bodies

Only one reply was received from an organisation belonging to this category and this was from the Royal Town Planning Institute – Irish Branch Southern Section.

Overall Summary of Response:

The RTPI anticipated that the WFD would result in clear benefits, although it identified difficulties in the mismatch between river catchments and local authority areas. There was clear support for the 'polluter pays' principle. Widespread stakeholder consultation was proposed to involve the public in preparation and implementation of the River Basin Management Plans, while local authorities (overseen by regional authorities and the EPA) were advocated for the long-term management of the RBDs.

Question 1. What water-related issues are of most concern to you?

The provision of an integrated approach to the management of water quality was identified as the water-related issue of most concern.

Question 2. What do you think of the Water Framework Directive's new and potentially tough approach to protection and management of our water resources? Why?

It was anticipated that the WFD would be beneficial.

Question 3. What risks do you see with the proposed administrative arrangements for the implementation of the Water Framework Directive?

"Local authority areas do not correspond with river catchments. It should possibly be the function of the regional authorities with a strong input from the EPA."

Question 4. How do you think that individuals, organisations and community groups can get involved in the preparation and implementation of the River Basin Management Plans?

The use of widespread stakeholder consultation was advocated.

Question 5. Who should be involved in the long-term management of the River Basin District?

"They should be implemented by local authorities and overseen by regional authorities and the EPA."

Question 6+7. Would you be willing to accept an increased personal cost for implementation of the Directive? If not, how should its costs be met?

The question was not answered explicitly, but the respondent advocated "the plans should be based upon the 'polluter pays' principle."

The respondent considered questions 8 and 9 not applicable.

8.12 Recreational NGOs

A total of 16 completed questionnaires were received that were considered to fall within this category. Ten responses were from members of the Inland Waterways Association of Ireland, two from sailing clubs/associations, and one each from the Ulster Waterways Group, the Inland Waterways Amenity Advisory Council (UK), a lockkeeper with Waterways Ireland, and a university activity centre. Sailing and boating interests were clearly represented amongst respondents but other activities' interests such as canoeing, swimming/ diving and so forth are not clearly represented amongst these responses.

Overall Summary of Responses:

- 16 responses (12.6% of total)
- Pollution concerns were identified in just over 50% of replies, with a similar proportion naming water quality as a concern. A third of respondents were worried about navigation-related matters.
- Slightly less than two-thirds of respondents expressed support for the WFD, the remaining answers were unclear
- Over half of respondents identified risks relating to the management structures for the proposed administrative arrangements. Over half the respondents saw difficulties surrounding the involvement of the public in implementation. A third were concerned about inadequate resources and also about whether active enforcement would take place.
- Over two-thirds of respondents felt that the public had to be motivated and supported in order to participate. Almost half the respondents felt that information and education was vital to enable the public to become involved in implementation.
- Over half the respondents indicated an all-inclusive arrangement would be optimal for long-term management of the RBDs. Just under a third felt that a new, dedicated national body is necessary to oversee implementation.
- 66% were willing to accept increased costs for implementation, although 60% of these qualified their position.
- In total, 20% supported the 'polluter pays' principle
- Over two-thirds of answers identified general benefits from implementation of the Directive, with 20% respondents anticipating any negative impact.

- Half the respondents felt that waste disposal requires greater control. A quarter listed agricultural activities and high powered leisure craft as needing restrictions. wide range of other sources of potential pollution were identified as needed restriction.

Question 1. What water-related issues are of most concern to you?

Just over half the respondents listed water quality issues as of concern to them, with a similar proportion raising concerns over pollution including specifically agricultural pollution, sewage-related discharges, and fuel releases into water bodies.

Quantity of water resources was also a major concern identified in a similar number of responses. Related issues concerned water levels, flow and flood controls, and excessive abstraction.

Navigation concerned a third of respondents, in relation to inland waterways. This was closely linked to concerns about the inland waterways themselves; their restoration, the need for dredging, and the prevention of deterioration. An additional issue was raised in this context regarding worries over the introduction of non-native plants.

Recreational use of water was another clear theme amongst over a third of respondents, with reference made to concerns over free access to water, safety and boating-related water sports.

A less common issue of concern related to the natural environment itself; wildlife and wetlands particularly, which was raised by over a quarter of respondents.

The "proper use of water resources for all activities" cited by one respondent, was echoed in a third of all answers.

Question 2. What do you think of the Water Framework Directive's new and potentially tough approach to protection and management of our water resources? Why?

Almost two-thirds of respondents were generally supportive of the WFD, seeing it as having potential to deliver necessary positive results. However, three respondents raised concerns in relation to its operation. One stressed the need for checks and balances as they perceived that the Directive " may be used to block the development and restoration of inland waterways", another thought it was likely to require a new authority to be set up, and a third wondered whether preservation rather than just protection could not be the aim. One respondent felt that the Directive needed to be more site specific in relation to quality gradings. (The remaining two respondents did not express a view on the overall WFD.)

Positive aspects of the Directive were identified in its holistic approach, its co-ordination of water management, the promotion of active enforcement, consultation, and the "spirit of inclusiveness in decisions, [this] direction should foster a culture of change & compliance which will achieve results far faster." "End of pipe" solutions alone were not seen as likely to produce the necessary results.

Support was expressed for the 'polluter pays' principle and 'precautionary principle' by three respondents in answer to this question, one of whom pointed out in relation to the

third principle (the recovery of the costs of water services) that this "should be linked to manufacturers who develop systems to reduce water consumption, because at the moment the consumer pays more for an energy efficient model than they do for an inefficient one and this is wrong". It was suggested that "improved pipe infrastructure would help eliminate wastage in cities and towns, thereby creating savings to offset the cost of the WFD. Possible use of water meters would determine usage and wastage." However, one of these respondents cited difficulties with the 'polluter pays' principle in the past where "often county councils were chief offenders and at the same time they were policing the pollution policy. Fines were few and far between."

Question 3. What risks do you see with the proposed administrative arrangements for the implementation of the Water Framework Directive?

The dominant theme emerging in answers to this question (from over half the respondents) relate to the management structures in the proposed administrative arrangements. The scale of the RBDs and the operation of the local authorities was also a clear issue amongst half the respondents. Fears were expressed that the issues and geographical area to be addressed are so wide ranging, implementation would get lost in minutia, and arrangements would become unwieldy. For some respondents "present experience is that some Councils hardly even speak to each other" and there was concern that it would be difficult to ensure "that same standards are set and enforced in all areas, especially since Districts cross Local Authority boundaries". Concerns over the number of different agencies needing to be involved, and the risk that chaos would ensue were also widespread. A quarter of respondents felt that the size and complexity of the task warranted the establishment of a new independent authority. It was also felt that conflicts might arise related to the challenges of co-ordination between so many agencies and as local authority boundaries do not coincide with RBDs. It was also noted that there would be considerable difficulty in ensuring consistency of approach and standards, and that the educational qualifications of elected members were insufficient for them to command the confidence of the public.

A second significant theme emerges in half the answers to this question relating to the risks surrounding the involvement of the public or stakeholders in the process of implementing the WFD. Two distinct aspects were apparent in this issue. Firstly, motivating people to become, and stay, involved was seen as challenging; with a general lack of interest amongst the public, difficulties getting stakeholders to accept ownership/responsibility for the problem, a danger of complacency developing after the original thrust, lack of trust, and the risk that people will have to deal with so much material of no interest to them that they will lose interest. Secondly, constraints to the ability of individuals and groups to participate were noted; a lack of financial, technical or human resources to devote to the formation of policy, the danger that a "small number of observers [or representatives] will not be able to keep in contact with the many groups of water users", and that "if [the WFD is] seen as state driven rather than active participation then compliance will not be for the right reason". An associated fear was expressed by one respondent that vested interests may negatively affect the process.

A third of the respondents identified a risk of inadequate resources to achieve implementation of the Directive, including personnel and resources. The implications of inadequate resources were seen as serious; implementing the Directive "will need either an army of staff or be slow and ineffective - leading to concerns if delayed work programmes". It was proposed that the situation should be reviewed in two years time.

A number of other issues emerge from individual answers to this question, including the need for effective enforcement, and financial accountability. A fear that navigation related aspects are likely to be onerous and heavy handed was also expressed.

Two respondents felt that "once the existing authorities agree on all aspects of the WFD there should be no risk".

Question 4. How do you think that individuals, organisations and community groups can get involved in the preparation and implementation of the River Basin Management Plans?

The main theme that emerges in the responses to this question concerns motivating and assisting people to become involved. This is mentioned by two-thirds of respondents who identify the need to make the process of consultation and involvement user-friendly. There is a clear view that participation should be actively sought and that government agencies should engage with their constituents to encourage them to engage in the process, promoting active rather than passive participation and a wide appreciation of every individual's 'duty of care'.

Half the respondents identified information and education as of central importance to enable the public to become involved. The need to maintain a constant stream of up to date information through a variety of media was stressed.

Another issue emerges amongst a significant number of respondents, who stress that there must be acceptance of the need to involve the public, and to "harness the expertise within their organisations and make it readily available to the RBD".

A number of methods of engaging the public are identified, including the use of all available media, leaflets, regular workshops and support for participating groups, especially in relation to technical and scientific matters.

Question 5. Who should be involved in the long-term management of the River Basin District?

The responses to this question indicated a very open and all-inclusive attitude to who should be involved in the long-term management of the River Basin Districts in over half the cases. All groups involved with water, those responsible for water-related infrastructure, and all stakeholders were suggested.

The other respondents stressed the role of statutory agencies, including local authorities. The Department of Communications, Marine and Natural Resources was mentioned and the Water Service & Rivers Agency in Northern Ireland.

Nearly a third felt that a new, independent, national body should be established to oversee implementation.

Waterways Ireland and the Inland Waterways Association of Ireland were mentioned in individual cases, and there was one reference to the use of experts with a remit to consult locally.

Question 6+7. Would you be willing to accept an increased personal cost for implementation of the Directive? If not, how should its costs be met?

Just over two thirds of respondents were clearly willing to accept increased personal costs for implementation, with one indicating that whether it was direct charges for water use or through taxation, the individual will pay anyway. Only two respondents were clearly opposed to this indicating that funds should be made available nationally or from the EU and stressing that individual charges would create a negative reaction as had been seen in relation to waste.

Of those who were prepared to pay additional costs, 65% were keen that value for money should be apparent, and indicated that they would like to know what their contribution would yield in ecological terms over a period of time and within their local area. It was also stressed that there should be "financial accountability and the public must have access to reports, etc". Several suggestions were made in relation to recovery of the costs of water services; firstly that "domestic water charges should be introduced early to reduce wastage and so consumers can force authorities to ensure good quality [water supply]", that the State should "tax all polluting products reasonably (washing powder, bleach, etc.)", that water wastage should be tackled, and that proper use should be made of existing water fees collected by the State on water services. A fifth of all respondents in this category supported the 'polluter pays' principle.

One respondent was clear that their group would need financial support to participate in the implementation of the Directive.

Question 8. How might implementation of the Directive affect your own activities?

The strongest theme emerging from answers to this question was a perception amongst over three-quarters of respondents that they (and the community in general) would experience enhanced recreational activities as a result of improvements brought about by the implementation of the Directive. Specific activities cited as benefiting were swimming, boating and fishing, and an anticipated overall increase in the recreational use of waterways was seen as a positive development.

Three respondents did anticipate a negative impact on their use of waterways, including delays or blocks to development and restoration of inland waterways, inhibitions on the use of waterways for recreation and potentially burdensome impacts in relation to navigation.

Question 9. What other human activities should be controlled or restricted in the interests of achieving the aims of the Directive?

The main area of activities that over half the respondents thought should be controlled is waste disposal, with particular mention made of grey water and toilet waste from boats (and pump out stations), septic tanks, sewage treatment and dumping.

Agricultural activities, slurry spreading and fertiliser inputs, were named by a quarter of respondents as needing restriction. A similar proportion were concerned that leisure craft, jet skis and associated engines should be controlled.

A fifth of answers also highlighted planning and development activities, including housing and infrastructure developments as needing attention.

Earlier comments on the positive holistic approach of the Directive were recalled and two respondents stressed that a focus on 'control' and 'restriction' would create problems. Instead use of education, information and public participation to reach agreement was advocated. It was felt that "changing attitudes would make it unacceptable and anti-social for any non-compliance activities to continue" and that this would be a more positive approach.

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9.0 Seminary Summary

"SEEKING YOUR VIEWS ON WATER QUALITY"

SUMMARY OF THE HERITAGE COUNCIL SEMINAR OF 18TH OCTOBER 2003,
HELD AT THE HODSON BAY HOTEL, ATHLONE

This summary presents the wealth of input received from those who attended the seminar. Details of the brief presentations made can be found on the Heritage Council website, or obtained by request from the Heritage Council

9.1 The programme for the Seminar:

09.30	Registration
10.00	Welcome (Ruth Delany, Chair, Heritage Council Working Group)
10.10	Overview of the Water Framework Directive – what's new? (Brian Goggin, Heritage Council Working Group)
10.25	Outline of feedback to the Heritage Council Consultation document (Beatrice Kelly, Inland Waterways/ Marine Officer, Heritage Council)
10.45	5 minute presentations on: <ul style="list-style-type: none">• Implementation of the Water Framework Directive (Dr. Ken Irvine, Heritage Council Working Group)• Impacts of the Water Framework Directive (Rick Boelens, Heritage Council Working Group)• Understanding and awareness (Paddy Mackey, Heritage Council Working Group)• Public participation in the Water Framework Directive (Dr. Harriet Emerson, consultant compiling consultation document responses)
11.30	Workshops These workshops will focus on issues arising from the feedback to the consultation document and the short presentations.
1.00	LUNCH
2.10	Workshop feedback session
2.30	Plenary session
3.30	Summary of the day's discussion (Colin Becker – Heritage Council Working Group)
3.45	Closing remarks
4.00	END

An attendance list is appended. A copy of the *Summary of the Consultation Document Responses* (circulated at the Seminar) can be found on the Heritage Council website (www.heritagecouncil.ie).

9.2 Workshop Feedback

Five simultaneous workshops each looked at the same three questions, which had been identified from the consultation document responses as particularly significant. The output from the different workshops has been compiled and is presented below.

Please note that it was not possible to explore the extent of consensus on issues raised or proposals made, and that where a single point was raised by multiple groups this has been included only once.

QUESTION 1:

A. HOW CAN THE IMPORTANCE OF WATER BE PROMOTED?

B. CAN YOU SUGGEST SUCCESSFUL AND INNOVATIVE WAYS TO COMMUNICATE INFORMATION ABOUT THE WATER FRAMEWORK DIRECTIVE TO THE PUBLIC?

A number of general points were made in relation to these questions:

- It was recognised that it is important to develop a sense of ownership around River Basins, and a "feel good factor" associated with being respectful and responsible in relation to water.
- It is most important that information presented is not conflicting as this gives a confused message; one national message is required. In the initial phases of communicating information to the public, information that can be deemed misleading should not be used. It was felt that there is a need to bring balance into the information already available, and that information must be supplied honestly and speedily. Up-to-date technical and scientific information should be presented in support of statements made. (This was particularly felt to be true for information on the WFD – as the importance of water was seen as less contentious.)
- In the educational process, it was suggested that the pressures of our consumer society need to be taken into account, and the extent of control individuals can have over this and the costs involved should be considered.
- Assume the goodwill of society in this initiative.
- Don't get into the "blame game".
- Link water quality issues and the value of water to the individual.
- Adopt an island-based approach.
- Provide accurate factual information on water quality (especially drinking water).
- Involve the Environmental Protection Agency.
- Make clear people's rights to water.
- Actively learn of both the good and the bad from other countries.
- Whatever actions are taken to raise awareness ensure that there is continuity, otherwise the exercise is a waste of time.

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All groups raised issues relating to how to organise campaigns to achieve the objectives in the questions. The following points were made:

An overall campaign:

- It was proposed that a major national awareness/ information campaign should be run, with a travelling roadshow accessible to people locally, in combination with public meetings to catch people's interest initially. It should be government responsibility to have this done and government should provide funding. The campaign could be run by a central body, which might tender for it. All the stakeholders should be happy with the campaign/ support it.
- There should be a steering group of stakeholders to reach general consensus prior to any information campaign and to manage the campaign (the Millennium Forests project was cited as an example of this)
- Co-ordination is needed to communicate a clear message and one clear mission statement about water.
- Use a one clear message in any national advertising campaign.
- Use slogans - such as "IS WATER RUNNING OUT?" to raise awareness
- Identify the different existing levels of knowledge, and have a strategy to respond to all of these different levels.
- Use both active and passive means of communicating the message
- Identify who we need to educate/ target/ persuade, and about what specific issues/ aspects! As different strands of society have different impacts.
- Promoting the importance of water was seen as a separate and initial campaign, which could be supported by all sectors and for which information should not be controversial. However, it was suggested that communicating information about the WFD is something that can only be done when the information is available for each River Basin District, i.e. the specific water bodies are identified, the risk analyses done, etc. – at that point there will be solid information relevant to local people to be discussed.
- Reinforce the message constantly (i.e. using billboards) -it needs to be a permanent campaign.

Media:

- Similar to the national litter campaign, use a broad media strategy– newspaper, TV, radio, etc.
- Use local radio; get youth involved in all aspects.
- Media attitude needs to be changed – instead of always showing the negative side of the water quality in the country there needs to be more positive publicity. Organisations need to use both local media contacts and national media contacts to do this.

Direct to individuals, households, groups, institutions:

- Use existing organisations (local and national), in a focused campaign; identify such groups, contact them and GO TO THEM, rather than expecting them to take the initiative. Examples include GAA, ICA, SMFA, Chambers of Commerce, farming organisations, etc. Use these groups as information sources, in both directions (to their members and from their membership to the authorities concerned).
- Deliver booklets to every individual household explaining the basic need for good quality water and the effect bad water standards have on our environment and eco system. Direct material to particular groups, making a 'multi-layered' approach.

Education aspects:

- Address education in all subject areas and levels, i.e. at agriculture colleges, IT Colleges, universities, through the Rural Environment Protection Scheme, in formal qualifications and others not nationally regulated.
- Make it part of the schools curriculum at all levels: primary, post primary and adult education.
- Make use of existing educational programmes/ schemes (examples included the Streamscapes programme).

Broad areas of content/ concern to be raised:

- Develop understanding of how we use water, and how we waste water; "What am I doing in my daily life?"- look at areas of developing personal responsibility with regard to awareness around water/environment.
- Explain that it is more than water which is at risk, our whole ecosystem(s) are affected.
- "The cleaner the water, the less the cost"explain that if people don't look after their water, it is going to cost them more money.
- Deal with it as a concept that people relate to – i.e. the inner workings of our bodies, which are 90% water.
- Link to health, water quality must be seen as a Health and Safety issue, like smoking.

Existing initiatives/ structures with potential for collaboration:

- Link into existing structures, events and locations to get the message across, such as Heritage Week, the forthcoming EU presidency, Local Authority SPCs (Special Policy Committees), Parish Councils, the zoo, canals, etc.
- Use the local elections to get politicians to the message across about the WFD, etc.

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A number of more specific proposals for campaign actions were also made:

Individual action/influences:

- Bring it down to the individual – show the cost and how cost could be reduced in the long term if the quality of the water was improved.
- List the ways that individuals (and through to large enterprises/activities) pollute water and what happens in processes of water use. In relation to information on the WFD ways to minimise these impacts should be identified and disseminated.
- Address 'what difference can I make?'
- Provide practical solutions – such as alternatives to bleaches, etc. Examples –such as energy stickers on machines- could include indicators for more eco-friendly (i.e. low water usage) appliances.
- Influence people's actions through the pocket and potential financial benefits i.e. give tax discounts, incentives for 'water friendly' purchases.
- Charge for water! – this will make people think it's important!

Community action:

- Involve as many different strands of society as possible.
- Use "Adopt-a-stream" type of projects, which involve people of all ages in a community.
- Show the positive and negative effects on the local community / village, and encourage communities to take pride in increasing the quality of their water.
- Local forums should be set up which will highlight the quality of the water locally and what measures need to be put in place to improve and/ or maintain quality.
- Use a water quality competition along the lines of the Tidy Towns competition, where people clean up their rivers and lakes, etc.
- Develop citizen's science programmes, e.g. voluntary monitoring (as in Canada), and a system of "streamkeepers", which would work in co-operation with state agencies.
- Hold a National Water Week.

Getting the message across:

- Use objects that we see everyday to pass on messages - i.e. stickers on domestic grocery items such as milk cartons, cereal packets. These should be highly visible, clear and simple
- Introduce a sort of 'branding' of the catchment areas – such as 'Fuschia' in West Cork – introducing the idea of traceability.

- Insist that the politicians use their canvassing material to raise awareness about the Directive.
- The Grand Canal is 200 years old in 2004 – use this major event as an awareness raising exercise.
- Local Authority Community officer to feature on radio.
- Produce videos – e.g. short films run daily on TV.
- Place signs on tributaries, highlighting salmon streams and the potential significance of water quality.
- Develop interactive maps of the River Basins and link this to other heritage issues, (with 5th and 6th classes producing other pages).
- Highlight the significance of clean water in the food chain, with knock on consequences for farmers/ food producers, etc.
- Give information on drinking water costs and the chemical additives included in it. (It was commented that this should be done after convincing people of the importance of water on other grounds.)
- Present information on the ‘water cycle’ nationally, especially in schools, as this is a very powerful image and is something that everyone should be aware of. Explain to the public what water resources are, where they come from, that they are non-renewable and effectively recycled.
- Point out that NOT complying with the WFD is NOT an option (given subsequent fines, etc.), and that it is better to spend the money on making the WFD work and all getting the benefit of good quality water.

Education initiatives – at all levels:

- As children are more open to issues, involve the schools with group activities and fieldtrips. Also, make full use of the curriculum, because at the stage that the Directive comes into effect, present school children will be adults and their support will be vital.
- Develop a new curriculum in schools, filling the gap on water awareness/ information, etc. The subject should be introduced as part of the syllabus at primary level straight away, along with secondary and post secondary. Train the teachers in this subject. Link water to existing subjects such as civics and science. As much of the learning as possible should be experiential, as this tends to have a more positive, long-term impact on the kids.....try and involve parents in the learning. (For example, the EAC science and nature workbook and maps with 10 types of exercises and walks to enhance a sense of involvement - Ennis Town Council, or the GLA policy to arrange school visits to water treatment adjacent to Corrib to explain processes carried out there.)
- Create a Website which is interactive...encourage kids in schools to submit information to the website about the water/rivers in their area. Get schools to create links through this website, which expands the learning and awareness of the people involved.

- The Central Fisheries Board – to develop a programme for 5th and 6th yr teachers and secondary level. Use C.D.s and hands- on, online teachers’ centres. May be manipulated, with possible follow-on by teachers.
- Have a WATER DAY at schools.
- Use leaflets to raise awareness and give to school kids but have some sort of questionnaire so that parents have to engage in the process and in turn become aware of the WFD
- All water based activities – life saving, sailing, windsurfing etc should include part of the WFD as part of their initial training courses.
- Develop training modules for the public.
- Bring stakeholders, such as farmers to the river on field trips, etc.
- Education programmes need to be agreed programmes, and contain facts not personal agendas – use for example an agreed video programme.
- Create a National Park for water, where its unique characteristics can be viewed (in wetlands, bogs, etc.)

QUESTION 2: WHAT NEEDS TO BE DONE TO ENSURE THAT THE ADMINISTRATIVE ARRANGEMENTS FOR THE WATER FRAMEWORK DIRECTIVE ARE EFFECTIVE?

General comments:

- Needs to be a level playing field, not one rule for the individual and another for big business.
- A conflict between the roles of water operators and regulators was identified. How this will be addressed needs to be explained to the public. It was felt that these functions needed to be separated.
- Look at the wider ‘value’ of water, such as for amenity and recreation, rather than just its cost.

Monitoring:

- A public forum or environmental ombudsman needs to be put in place to monitor the work.
- The EPA already has a monitoring role, maybe this could be expanded?
- A monitoring programme supplementary and complimentary to existing monitoring by other agencies (local authorities and EPA) is necessary.
- Provide a 24hour/day, 7 day/week water testing facilities, as pollution incidents don’t only happen during working hours.

- A need for regular reporting from Brussels was identified.
- Have a thorough and clear environmental management system; name actions, review how these actions are carried out and if not as planned, establish why not.

Public involvement:

- Decisions need to be informed on a "bottom-up basis". Develop a system of working from the 'bottom up', with information, wide consultation and /or formal involvement.
- Consider all the geography. It is necessary to focus on involving people at different scales.
- Make use of the moral imperative to sway people's opinion.
- Re-brand the WFD with a more user-friendly title.
- Use interdisciplinary groups, such as in the SE region.
- The local authorities need to set achievable local targets so that the public can feel that progress is made and feel part of that process

Long-term strategy:

- Plans need to be put in place so the knowledge and skills developed in the present 'projects' phase are passed on to the people on the ground to ensure long-term sustainability.
- Decisions need to be sustainable (i.e. ecologically and environmentally centred).

Agency-related comments:

- The need for an overall national water authority to take responsibility for implementation of the Directive was raised in all groups. Some were clear that it should be statutory, autonomous /independent and non-political. Some felt that this should be separate to the existing administration and its responsibilities should be clear, others that it could be part of an existing structure to cut down on costs and bureaucracy. (Comparable examples such as the Northern Ireland Water Council, or the UK National Water Authority – similar to a National Roads Authority - were cited.) The extent of the powers of such an agency were not explored widely, but it was felt that it would need to have a strong co-ordination role, and might take on the task of standardisation of implementation between RBDs.
- In one case it was suggested that water should be treated as food and responsibility for ensuring quality standards should be given to the Food Safety Authority of Ireland.
- A watchdog, regulator, or ombudsman, to scrutinise the work of the RBDs was widely felt to be important. This overseeing body could ensure confidence that the River Basin Management Plans would be delivered on. Again, this might be an add-on layer to an existing body rather than a new body.
- Other agencies were mentioned as appropriate to take a role in enforcement and monitoring such as the Fishery Boards, Health and Safety Authority, and Health Boards.
- If a distinct agency or department was established, then it was proposed that staff could

be removed from existing agencies to the new agency where appropriate.

- It was pointed out that River Basin Districts should have the opportunity to tighten up on existing structures.
- Adequate resources are needed for any regulatory function.

Responsibilities:

- There needs to be complete transparency with the agencies involved so that the public is completely clear as to "who does what, and how" & "who is responsible for what". Since the authorities need the support of the public for their successful operation, this information should be disseminated effectively.

Integration

- Local authorities need to integrate all water quality issues across all departments, especially involving the planning departments.
- Local authorities will need to work together. How this is to be done and that it is done will need to be made clear to the public.
- Integration will need to include computer systems compatibility, GIS mapping of water mains, etc.

Implementation/ enforcement:

- The law needs to be implemented, and be seen to be implemented. This needs to be transparent across all sectors.
- Demonstrate that the policing systems function and introduce accountability around who is doing what, and who is not adhering to the WFD. "Naming and Shaming" (published lists of those who do and those who don't fulfil their obligations) was suggested. It was felt important to publish names of those who are not complying.
- Services provided by local authorities and other agencies involved should be efficient.
- There needs to be the political will to drive forward the WFD.

Costs:

- It was recognised that the costs involved are enormous and these should be factored into provisions for the administration. It is necessary to find adequate resources to administer the WFD and for competent authorities to deliver their responsibilities.

Information/ transparency/ fairness

- Make the fairness of any measures introduced apparent, especially in relation to charges.
- Local water rates are necessary. Although complex these should be fair, and it should be visible where the monies raised end up.
- Costs/ charges should be relative to water use.

- The pooling and sharing of information/ expertise between stakeholders is important.
- Needs transparency, public access and communication.
- Provide clear information on responsibilities in relation to water quality.
- Make RBDs subject to freedom of information.
- Decisions should be made democratically at local level.

Complexity

- It was acknowledged that each catchment has lots of different problems and challenges, and that there has to be many approaches as part of a complex response to these.

Study

- Programmes of study were identified as important, for example in the task of characterisation, defining pressures on water resources, in wetland areas.

QUESTION 3:

IN WHAT SPECIFIC WAYS CAN THE PUBLIC BE ACTIVELY INVOLVED IN THE IMPLEMENTATION OF THE WATER FRAMEWORK DIRECTIVE?

This question was seen as clearly and closely linked to question 1, and the need for adequate information and education, and for the public to appreciate the importance of water.

General points:

- There is a need to distinguish between 'individuals' and 'groups' in use of the term 'public'. Individuals can contribute via information and consultation processes set out in the WFD. Mechanisms do need to be developed for individuals/ non-aligned to be involved. However, it was felt that the need for information and awareness was vital for individuals to take part, and that they might need to be asked specific questions in order to generate the most useful input.
- It was recognised that people are involved in many ways (i.e. through consumption and recovery of water), and are a rich source of knowledge and could be used as educators.
- A feeling of 'ownership' of water issues should be encouraged amongst the wider public. Local action and involvement in management will help establish this sense of ownership.

- It is necessary to ensure the balanced involvement of the public (who and where).
- There needs to be an integrated approach which represents all interests. A process is needed whereby all interested parties can put aside/ deal with their differences, and work towards implementing the WFD.
- People need to know what their real choices are, i.e. for high quality water, etc
- It was felt that the public should be the ones to decide how the WFD is implemented
- It was suggested that involvement should be linked to other things that are happening.
- Recognition on the part of government and agencies is needed as to what the public can contribute, and the value of these contributions.
- Stress active participation
- Encourage youth involvement.
- Building trust is a major challenge.

Information:

- Information (see q. 1) was seen as vital since public participation has to help the process of implementation not hinder it, and uninformed people can often slow up the whole process
- Information supply and feedback to local communities was seen as very important. A system is needed whereby information is clearly and concisely fed back to local groups so that the people on the ground have a knowledge of what is happening and are also included in the process. Resources, such as existing groups, should be used so that reports reach all of the public. A need for constant issuing of information was identified, and for dissemination of data from the implementing bodies.
- Provide accessible information for the public on:
 - o how to 'use' the system, i.e. who to contact about specific issues;
 - o water quality assessment;
 - o what the targets are and the public's responsibility towards meeting those targets;
 - o ways to protect and conserve water.
- The RBD Management Plans must be put in the public domain before any implementation of them takes place.
- Introduce an opportunity for the public to comment on plans or proposals made by other groups in relation to the WFD, i.e. conservation NGO reports.
- National documents should be published each year, outlining the work to date and progress made etc.
- Transparency mechanisms are needed to show how public participation is taken on board - or not.

Practical issues:

- A need for funding of public participation was identified as important, as the cost to voluntary organisations makes participation inequitable. Support should be provided for self-organising networks, and it was felt that resources should be prioritised for local involvement.
- Use facilitation, and existing community bodies.
- Hold meetings outside working hours.
- Improve access to agencies, e.g. by phone, email.

At RBD Management Group level:

- Organised stakeholder groups should be involved at Management Group level. A specific model using pillars representing different sectors was proposed. It was suggested that this should use the reformed local authority system. This has the advantage of using the bodies that will eventually make the decisions on the River Basin Management Plans. There would be a need to address the presence of multiple local authorities within each River Basin for this model to be applied.
- It was felt that there should be non-governmental organisation representatives at this level.
- Key economic stakeholders should be involved at Management level in River Basin Districts.

Other mechanisms:

- Public Fora should be organised at RBD level to meet 4-5 times per year, to identify clear goals to feed into and inform the implementation process
- A review structure should be put in place which would meet once or twice a year – more so at the beginning, maybe every quarter.
- The Community Fora of the Community and Voluntary sector could be used in the implementation.
- Local Agenda 21 within the Local Authorities has potential but needs to be developed.
- Use the existing NGOs' data and expertise
- NGO's need some sort of council to harness their expertise and work together to achieve the objectives of the WFD.
- For input, use organisations that already exist. Get these together to form broad groups – include leisure, farming, commercial, consumers, environmental bodies, aquaculture, wild fisheries, municipal bodies, academics/ researchers/ social/ health, etc.
- The example of the South East RBD was outlined, where 160-170 groups responded and have held meetings and elected representatives.
- Well-advertised public meetings of 2 hours, twice a year for all NGOs were proposed.
- Provide some sounding board to bring different expertise to the process, especially to legislative bodies and those making policy.

- Involvement with the National Co-ordination Groups for RB groups getting to grips with technical requirements in existence.

Actions/ issues:

- It was suggested that focus should be on specific elements of the broader issue, i.e. the 'clean, green image' employed in the plastic bag tax campaign. So, for example, if the focus was on 'conservation', then measures to support this should be introduced, i.e. double-flush toilets, facilities for re-use of water, etc.
- Set-up a confidential reporting mechanism for use by individuals, to communicate pollution incidents, wasteful or inappropriate use of water, etc. These reports should be responded to promptly, but the information can also be logged and used by the River Basin Management teams to improve their own operation. If an individual reports an incident, have a feedback mechanism. Positive reaction to a complaint is an indirect means of implementation. Give an immediate reaction.
- People need to know the individual cost of implementing the WFD, and how they can reduce that cost by changing their own habits.
- 'River Care' or 'River Watch' groups need to be set up locally, working in partnership with agencies. Make the problem catchments the first priority.
- Use local task groups.
- Conduct household water audits.
- Harness local knowledge to implement the Directive.
- Make the most of working with the NGOs that are willing to volunteer.

OTHER ISSUES:

A number of other issues were also raised. These included:

- Concern about the disinterest of local authorities in relation to water quality to date, their negative reaction to reporting of problems and very poor liaison was cited.
- Lack of information between local authorities and other authorities.
- No sense of statutory bodies working together.
- Resources – who is going to fund what is really needed?
- The lack of co-operation between existing groups.
- Consideration of Group Water Schemes.
- Chlorination of water.
- Independent facilitation is required to bring groups together and focus on what they can work with rather than the difference.
- The implementation of the Habitat Directive.
- The prison system.
- Community Employment Schemes.

9.3 Plenary Session Summary

(Responses from members of the Heritage Council Working Group are presented in italics.)

Jim Connolly - Rural Resettlement:

There is an imbalance to the debate on water sewage treatments causing pollution. The perception is that the rural dwellers are causing this pollution alone, whereas the urban system is causing massive pollution. There is a lack of technical information on the problem, especially with regard to septic tanks and the importance of percolation. All taxpayers contribute to sewage systems used by urban dwellers, but rural dwellers with septic tanks fund their own sewage systems with no money from the exchequer going into installation of private septic tanks.

Ken Irvine - stressed the importance of a balanced debate. There are genuine issues about septic tanks and everyone has their perspective on the different issues, but it is important to look at the bigger issue and not let discussion get bogged down.

Francis Fanning – IFA:

Congratulated the Heritage Council for holding the conference. Acknowledged that agriculture has put pressure on the environment, as has industry and other activities. Stressed the importance of all sectors facing up to their responsibilities with regard to

ensuring clean water. The presence of the IFA at the conference indicated their willingness to be part of finding solutions, and it is necessary for everyone to carry their fair share.

Martin McEnroe – Recreational Anglers of Ireland:

If there are charges for water, the monies raised must be spent on water, not on other things such as roads.

John Crossan – Peace Tree Walkers:

Why do we have so many additives in our water?

Paddy Mackey – VOICE has been campaigning against fluoridation of water for some time. He offered to provide additional information after the Seminar.

Rick Boelens – Chlorine is the most (cost) effective way of sterilising water at the moment. There are other ways of sterilising the water but they are more expensive. As water quality increases, less chlorine will need to be used. Fluoride has been added to water to strengthen teeth, originally on the recommendation of dentists' representative organisations.

John Murphy – Inland Waterways Lough Derg:

Everyone is a polluter and we need to acknowledge that fact. We should stop the 'Blame Game' and start dealing with the problems. Congratulated the farmers and fishermen present on their involvement, but expressed disappointment with the lack of County Council representatives at the conference.

Jim Devlin – IFA:

The cost of water is relatively easily measured, but what we forget is the many aspects of 'value' of water i.e. for recreation, amenity, etc. This needs to be considered.

Bureaucracy needs to be kept to a minimum, with decision-making and action taken at the local level as far as possible. Identified a major lack of interaction between authorities and 'Joe Public'.

Pat Brogan - individual:

Nobody minds paying for good service, people pay money for bottled water and will pay for water if the service is good. Existing agencies have failed in their brief to improve the quality of water, so why should the public be made pay for bad quality and poor service. However, water needs to be at a standard where people can drink it. In his area the public were told that water was 'ok', but when tested it had more chlorine than the local swimming pool. Parasitic organisms found in River Nore have found their way into finished drinking water supplies. Very little action is taken when pollution is identified.

The management has been left with agencies, who have had the power long enough and are not addressing the problems. We have to have a new agency set up to be responsible for the WFD. Quoted EU correspondence stating that the EPA had a tendency to support the local authorities.

Ken Irvine – Implementation of WFD will ensure adequate monitoring – yes there is a need to improve existing monitoring but we need to have faith in the LA's to do this. The

Directive is all to do with establishing good ecosystems. Felt another agency would create another layer of bureaucracy. Chlorine has enabled people survive. Prevention is better than cure.

Rick Boelens – Things get through the net and we must look for better monitoring. There is little faith in local authorities and they need to be aware that people do not trust them.

Brendan Price – Irish Seal Sanctuary:

Subscribes to the objectives of the WFD. Most of the things in the Directive are already in law, such as good quality water and cost recovery. Those areas open to subsidiarity are the only ones in which we can make a difference. How can we implement public participation? We need to make full use of existing data/ knowledge, such as that held by farmers' organisations etc.

Ken Irvine – clarified that the Directive is a de facto responsibility of the government, and will be introduced into legislation by the end of the year.

Ray Norton - Mayo County Council:

Apologised for the polluting of rivers, lakes and water bodies and poisoning of the population undertaken by local authorities over the last number of years.

Stressed that the WFD is about improving the quality of water. In 1970 An Foras Forbatha identified eutrophication as a problem. It is getting worse, everyone knows this and yet nobody does anything about it. Teagasc used to tell farmers to use phosphate, which is now recognised as undesirable. We have to accept the problem, everyone accept their proportion of the problem and move ahead. Resources are needed to bring this about, but there is talk about cut backs in the public service, not additional resources.

Philip Comber – Ennis and District Anglers:

Monitoring is no good without implementation of the laws, and there are no prosecutions. Ground water contaminants have been 3 times the acceptable level and still no fine was applied. There is no group taking the bull by the horns, fines need to be imposed. Who is going to prosecute under WFD?

Ken – the issue comes back to funding again; more monitoring means more investment. You can't do more work for less money. It is not just about water, its about fish, plants, etc.

Rick – Under the Directive we have to monitor things that we have not done previously. We must test to see whether we are complying with the Directive. Monitoring is more complex, more facilities and people are needed and this cannot be done with existing resources.

John Leach – Irish Water Safety:

People need to be educated about water and the WFD. It needs to be taken into the classrooms at primary and secondary level, but also to be fully integrated into other training, such as for sailing and diving courses.

Ruth Delany – the success of the Irish Water Safety Association's campaign in raising awareness of water safety issues, suggests they can speak from a respected position of authority on this.

Alison Badrian – Green Party:

A hotline number should be set up so that people can report pollution in a confidential manner.

Jim Devlin – IFA:

Stressed that illegal incidents of water pollution, etc. can already be reported to the Gardaí, IFA or relevant local authority. He felt that inappropriate use of water, such as for car washing, etc. should be treated in a similar manner.

Mo Mathies – Bord Iascaigh Mhara:

The Environment & Heritage Service has such a hotline in the North of Ireland. Cost of monitoring and enforcement should come from the fines imposed on polluters and also on people who waste water. None of the agencies have really used their enforcement powers to date.

Mike Fitzsimons - Regional Fisheries Board:

The Fisheries Board has a 24-hour monitoring service – any calls are anonymous. They endeavour to prosecute, but point out that the fines, which are laid down in statute, have to be imposed by judiciary.

Ruth Delany - wastage of water is a critical issue, not fully addressed.

Ken Irvine – people are using more water, water shortages are getting worse, and with climate change we need to be careful how we treat our water resources.

Eamon Cusack – Shannon Regional Fisheries Board:

People do get prosecuted, but damages also need to be awarded against the polluter. Pollution is not just a one-sector issue. Existing agencies are doing a good job, but a regulator is needed to ensure complete implementation by existing agencies. There is little trust in the State agencies, which is part of the problem and they have inadequate resources to do their job.

Christine Croton – Birdwatch Ireland:

Pointed out that the Directive is about more than just water. She welcomed the greater amount of consultation around the eco-systems, Protected areas etc. She enquired what role the Heritage Council has in regard to public participation.

Ruth Delany – the Working Group on the WFD will continue, making use of the output from the seminar, and make policy recommendations to government.

Rick Boelens – we have evolved a very narrow vision of the water environment. There are a variety of activities that we don't automatically see as a threat, but which will have to be addressed. Each agency will have to address how it will implement the Directive.

Ken Irvine – We need to move away from thinking just about water quality and start to think of eco-system quality. It is about the health of the eco-system and not just about what we drink.

Maire Ní Choinnín - Galway Co. Council:

Raised concerns about water conservation. She suggested that we use too much water, and spend a great deal of money on infrastructure to support this, rather than taking on the challenge of water conservation. She saw a need for metered water supply, as it is not a free resource. She proposed that the government should set a target or limits as to how much water individuals use. This would need to be integrated at policy level to decrease the amount of water usage. We need to come up with more guiding principals on how we actively involve the public.

John Sadlier – Department of the Environment, Heritage and Local Government:

Thanked the Heritage Council for hosting the seminar, which he found hugely beneficial. He stressed that there is already a huge amount of work going on within the agencies involved in implementing the Directive, and which is being led by the DoEHLG. However, instead of an increase in funding the government are cutting back in the public sector area, and for those involved the tasks are in addition to their existing responsibilities. He sees the Directive as removing hiding places as the systematic inventory of river basins requires them to reveal full information, and bringing together the functions involved in ensuring water quality, revealing areas that are not being addressed currently. He was pleased to see local authority representatives from each of the seven anticipated River Basin Districts present at the seminar. He suggested that the exemptions under the Directive are more troublesome and costly to qualify for and that it is better to aim to achieve the objectives. He stressed that as of now there is an obligation to prevent deterioration in any waters – a higher objective than is often recognised, and that to achieve good quality status by 2015 we must protect what we have. He also pointed out that whether directly as consumers or indirectly as tax payers, the public will foot the bill.

Ruth Delany – thanked the Department for their involvement and enthusiasm for the work of the Heritage Council in this area.

Anne Curran – Sacred Wells:

Proposed that a thorough report be published every year in the newspapers (in a supplement format) to keep the public informed of the process, including what work is been/has been undertaken, costs, progress. This should reach as wide an audience as possible, may be a source for volunteers.

Anthony Waldron – Carra, Mask, Corrib Water Protection Group:

Recognised that it is important that we appreciate our ecosystems and improve their ecological status. He quoted an official report indicating that the necessary monitoring framework is not possible because the technology is not available.

Maire Ní Choinna – Galway County Council:

Pointed out that the statement referred to was now two years out of date.

Ken Irvine – agreed that they have not got all the answers yet, but that these are the focus of work and will be forthcoming in 18 months.

Ruth Delany – thanked all the contributors and stressed again that their inputs would be considered by the Heritage Council as it put together its own policy recommendations.

10. CHALLENGES ARISING FROM THE CONSULTATION FEEDBACK

A wide range of challenges to successful implementation of the Water Framework Directive emerges clearly from the public consultation exercise outlined in this report. The following list synthesises a number of these and highlights some of the most significant areas raised. To address these challenges will require the co-ordinated effort of a number of authorities and agencies at all levels within the State.

- Informing the public as widely and thoroughly as possible of the importance of water, and of the commitments made under the WFD. In addition, there is a need to generate interest in all aspects of water amongst the public, and to motivate them to support efforts under the WFD to achieve "good status".
- Successfully reassuring the wider public that there are adequate mechanisms in place to deal with potential conflicts of interest in the various roles of the local authorities, ensure internal and intra-agency co-ordination, and demonstrate that these (and any other competent agencies) are adequately resourced to deliver their responsibilities.
- Establish a sufficiently inclusive model of public participation, which demonstrably reflects all relevant interests at appropriate levels within the River Basin Districts, enables those groups that wish to participate actively to do so, and satisfies the public that their input through this mechanism is valued.
- Demonstrate that all public participation undertaken is meaningful and not tokenistic, with the provision of necessary supports to enable all sectors to be actively represented.
- Inform and involve the community at large in the process by which the measures necessary to achieve 'good status' water are established, and develop their support for these. It is necessary to capitalise on the expressed support for the WFD amongst the majority of respondents in this consultation exercise.
- Demonstrate that all human activities impacting on water have been thoroughly examined and that their negative impacts are adequately and consistently addressed in the measures adopted as part of the River Basin Management Plans. In addition, the other functions of competent authorities must be seen to respect the decisions agreed as part of such Management Plans.
- Make evident the responsibilities of the relevant agencies for water-related issues, and ensure that they deliver these functions and services efficiently and transparently.
- Design an inclusive partnership for long-term management of River Basin Districts, which would be reflected in a widespread appreciation of all citizens' duty of care for water resources.
- Implement agreed measures in River Basin Management Plans consistently, and with transparent fairness, and actively enforce regulations introduced.
- Provide feedback on positive achievements of implementation of the Water Framework Directive

Appendices

A. "SEEKING YOUR VIEWS ON WATER QUALITY" – THE QUESTIONS CONTAINED IN THE CONSULTATIVE DOCUMENT

1. What water-related issues are of most concern to you?
(see page 13 for overview of all responses to this question)
2. What do you think of the Water Framework Directive's new, and potentially tough, approach to protection and management of our water resources? Why?
(see page 14 for overview of all responses to this question)
3. What risks do you see with the proposed administrative arrangements for the implementation of the Water Framework Directive?
(see page 14 for overview of all responses to this question)
4. How do you think that individuals, organisations and community groups can get involved in the preparation and implementation of the River Basin Management Plans?
(see page 15 for overview of all responses to this question)
5. Who should be involved in the long-term management of the River Basin Districts?
(see page 15 for overview of all responses to this question)
6. Would you be willing to accept an increased personal cost for implementation of the Directive? If not, how should its costs be met?
(see page 16 for overview of all responses to this question)
7. How might implementation of the Directive affect your own activities?
(see page 16 for overview of all responses to this question)
8. What other human activities should be controlled or restricted in the interests of achieving the aims of the Directive?
(see page 16 for overview of all responses to this question)

(Note: that the responses to each question from the various groups of respondents are set out in section 8.0 of the Report, beginning at page 24)

B. COMPLETE LIST OF ORGANISATIONS REPRESENTED BY RESPONDENTS

An Taisce - the National Trust for Ireland	Kinsale Yacht Club
Anglingwest.com	Laois County Council
Bat Conservation Group	Lough Dearg Anglers Association
Birdwatch Ireland	Lough Neagh & Lower Bann Advisory Committee
Bord Iascaigh Mhara	Lough Sheelin Trout Protection Association
Camlough & District Anglers Club	Macra Na Feirme
Carra, Mask, Corrib Water Protection Group	Macroom Town Council
Castle Blayney Anglers	Maritime Institute of Ireland
Catholic Church	Mayo County Council
Church of Ireland	An Taisce
Clare County Council	Mid-West Regional Authority
Clonmel and District Aglers Club	Monaghan County Council
Coastwatch	National Federation of Group Water Schemes
Construction Industry Federation	National Parks & Wildlife, Dept. of Environment
Cork County Council	Networks for Nature
Cork Trout Anglers Association	North Eastern Health Board
Cullann Angling Club	North Tipperary County Council
Dublin Dockland Development Authority	North Western Health Board
Eastern Regional Health Authority	Northern Regional Fisheries Board
Electricity Supply Board	Offaly County Council
ENFO	Offaly Leader+ Company
Ennis & District Anglers Association	Recreational Angling Ireland
Environmental Protection Agency	River Bann & Lough Neagh Association (RBLNA)
Eyrecourt Community	Roscommon County Council
Fáilte Ireland	Rossmore Coarse Angling Club
Féidhlim Harty Wetland Systems	Royal Town Planning Institute
Fermoy Salmon Anglers Association	Save Our Lough Derg
Fingal County Council	Shannon Regional Fisheries Board

Food Safety Authority of Ireland	Shannon River Basin Project
Freshford	SLAA (Angling Association)
Galway City Council	Sligo Borough Council
Galway County Council	SOLVE (Save Our Lake and Valley Environment)
Green Party	South East Galway IRD - Heritage & Training
Inland Waterways Amenity Advisory Council	South East Tourism
Inland Waterways Association of Ireland	South Eastern Health Board
Irish Boat Rental Association	South Eastern River Basin District Project
Irish Char Conservation Group	South Western Area Health Board
Irish Farmers' Association	South Western Regional Fisheries Board
Irish Fishermen's Organisation	South Tipperary County Council
Irish Naval Service	Taighde Mara Teo
Irish Peatlands Conservation Council	Thurles, Suir and Drish Anglers Association
Irish Sailing Association	Tipperary Institute
Irish Seal Sanctuary	Tuam and District Anglers
Irish Water and Fish Preservation Society	Tulla and District Angling Club
Irish Water Safety Association	Ulster Waterways Group
Irish Wildlife Trust	University College Cork
Kerry County Council	University College Dublin
Kildare County Council	University of Limerick Activity Centre
Kilkenny Anglers Association	VOICE - Voice of Irish Concern for the Environment
Killeshandra Angling Club	Waterford City Council
Killybegs S.A.C	Waterford City Council
	Waterways Ireland
	Western Health Board
	Westmeath County Council
	Plus 18 responses from individuals

C. COMPLETE LIST OF THOSE IDENTIFIED FOR INCLUSION IN LONG-TERM MANAGEMENT OF RBDS

- Agriculture organisations
- All interested parties/ stakeholders
- All interested state bodies
- Angling clubs
- Bord na Mona
- Business
- Civil Defence
- Coillte
- Community groups
- Conservation bodies, Environmental NGOs
- Construction Industry Federation
- Consumer representatives
- Co-ordinated Local Aquaculture Management System representatives
- Department of Communications, Marine & Natural Resources
- Dept. of Agriculture and Food
- Dept. of the Environment, Heritage and Local Government
- Dúchas
- Educational authorities
- Electricity Supply Board
- Environment Protection Agency
- Food Safety Authority of Ireland
- Forestry industry
- Garda Síochana
- Geological Society of Ireland
- Health Boards
- Heritage Council
- Housing groups
- Industry
- Inland Waterways Association of Ireland

- Inshore Fisheries Boards
- Landowners
- Local Authorities
- Marine Institute
- National Federation of Group Water Schemes
- Navigation trusts
- Office of Public Works
- Recreation/ leisure interests
- Regional Fishery Boards
- Relevant experts & technical advisers (incl. biological & physical aspects of catchment management)
- Teagasc
- Tourism representatives
- Water Service and Rivers Agency (Northern Ireland)
- Waterways Ireland
- Wildlife Section of Dept. of Environment

D. COMPLETE LIST OF ACTIVITIES IDENTIFIED AS REQUIRING CONTROL/RESTRICTION IN ORDER TO ACHIEVE AIMS OF DIRECTIVE

- Agriculture (incl. slurry spreading, fertiliser, herbicide & pesticide use, nutrient run-off, stocking levels, disposal of surplus milk production)
- Airborne pollution
- All discharging activities
- Aquaculture
- Concrete ground cover
- Development (urban, industrial, domestic and agricultural)
- Domestic detergents
- Drainage from mechanical/maintenance yards, businesses and roads
- Dumping (on land, in water bodies, and at sea)
- Effluent disposal
- Fisheries guidelines

- Flood alleviation schemes
- Floodplain development
- Forestry activities
- Gravel removal from streams/rivers
- Industry
- Introduction of exotic species
- Land reclamation & drainage
- Leisure pursuits
- Licensing of water discharges
- Local authorities' activities
- Management of riparian zones
- Marine engine pollution
- Military activities
- Motor transport
- Motor wastes (oils, etc.)
- Planning (for housing, infrastructure, industry, etc.)
- Power boat use on canals, rivers and at sea
- River and lake side development
- Sand/ gravel extraction
- Sea fisheries
- Sewerage & waste water treatment (municipal and private) – septic tanks, sewage treatment plants,
- Stormwater soakaways
- Tourism
- Turf cutting
- Use of reed beds
- Waste disposal
- Waste disposal from boats (incl. sewage)
- Water abstraction
- Water consumption
- Water supply systems (wells – commissioning & decommissioning, group water schemes, large scale extraction, leaks)
- Wetland drainage

E. COMPLETE LIST OF ORGANISATIONS REPRESENTED AT THE SEMINAR (18TH OCT. 2003)

Bat Conservation Group	Irish Seal Sanctuary
Bere Island Conservation Plan	Irish Water & Fish Preservation Society
Birdwatch Ireland	Irish Water Safety
Bord Iascaigh	Irish Wildlife Trust
Cara Mask Corrib Water Protection Group	Kerry County Council
Centre for Water Resources Research	Kilkenny Anglers Association
Cork County Council	Killybegs Sea Angling Club
Dept of Environment, Heritage & Local Govt.	Mayo County Council
Dublin Trout Anglers	NARA Angling
Eastern River Basin District Project	National Federation of Group Water Schemes
Ennis & District Anglers Association	National Parks & Wildlife Service
ESB	Offaly County Council
Faillte Ireland	Mhara Recreational Anglers of Ireland
Friends of the Irish Environment	Roscommon County Council
Galway City Council	Rural Resettlement Ireland
Galway County Council	Save our Lough Derg
Green Party	SERBD
Heritage Council	Shannon Regional Fisheries Board
ICMSA	Shannon River Basin District Project
IFA - National Environment Committee	Slaine - Charity Sacred Wells
IFA Regional Vice President	South East Galway IRD
Inland Waterways Association of Ireland (IWAI)	South East River Basin District Project
IWAI - Athlone Branch	South Western Area Health Board
IWAI - Corrib Branch	South Western Regional Fisheries Board
IWAI - Kildare Branch	Tree Peace Walk Group
IWAI - Barrow Branch	Tulla & District Angling Club
IWAI - Offaly Branch	Tulla District Anglers
Irish Boat Rental Association	Waterways Ireland
Irish Federation of Pike Anglers	Western Regional Fisheries Board
Irish Ladies Fly Fishing Association	Plus 7 individuals
Irish Sailing Association	