



Eastern River Basin District

Water Framework Directive

Submissions Digest Report 2009



eastern
river basin district

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Introduction

This report summarises submissions made on the Draft Eastern River Basin Management Plan (RBMP), issued on the 22 December 2008 for six months of public consultation. The Draft Management Plan sets out a roadmap as to how the status of our natural waters will be protected and restored. Throughout the Plan we have asked interested parties key questions and we encouraged them to make comments and tell us their views and opinions on these, or any other issues they have concerning our waters. A Strategic Environmental Assessment and Appropriate Assessment under the EU Habitats Directive were prepared in draft, to accompany the Draft Plan. They were also subject to the same statutory consultation process.

The consultation period ran from 22 December 2008 to 22 June 2009 and a series of public information events on the Draft Plan were held in different towns in the District. Notices were publicised in major newspapers circulating in the vicinity, supplemented by radio interviews given by the Eastern River Basin District coordinator. The public notice placed in the various newspapers is shown in Appendix A. In addition, a copy of the Draft Plan, Strategic Environmental Assessment and Appropriate Assessment were made available on the ERBD w (www.erbd.ie) and WFD Ireland (www.wfdireland.ie) websites for public information.

An important background report, known as "Water Matters" was prepared in December 2007 by the relevant local authorities covering each river basin district. It includes a preliminary overview of significant water management issues across each river basin district and actions suggested to solve these problems, in addition to inviting public comment. This report is used as a background report for the Draft Plan. Information on public consultation for this report can also be seen in Appendix A.

Currently, the EU Water Framework Directive 2000/60/EC (WFD) is being implemented across Europe. It is recognized by the Directive that Non Governmental Organisations (NGOs) play an important role in the implementation of the WFD where the Directive states "the success of the WFD relies on close co-operation and coherent action at Community, Member State and local level as well as on information, consultation and involvement of the public users".

In the context of Ireland, the WFD as transposed by S.I. 722 of 2003, under Article 14, refers to public information and consultation on the plan. In order to finalise the Draft Plan and to facilitate Article 14, a report must be published, outlining in a transparent way, how submissions influenced the final RBMP. The implementation timeline of the Directive can be seen in Table 1., where it can be seen that the final plan must be adopted by December 2009; consequently, the submissions report must be delivered prior to this deadline.

A total of 64 submissions were received by the ERBD office through the comments@erbd.ie e-mail address. Each official submission was acknowledged and allocated a unique registration number. Comments within each submission were also given a unique identification number.

Comments were collated into a series of tables which are available for viewing at the ERBD web site (www.erbd.ie). In summary, this report consists of the following:

- An executive summary which highlights the organisations that made submissions on the Draft Plan;

- A chapter on the key pressures highlighted by the submissions;
- A summary of comments by pressure; and
- Appendix A presents advertisements on the public consultation events and “hits” on the ERBD website (www.erbd.ie).

Table 1: Implementation Timeline of the Water Framework Directive

Year	Action Required
2000	Directive enters into force.
2003	Directive to be transposed into national law. International River Basin Districts and River Basin Districts to be identified. Competent authorities to be identified.
2004	Characterisation of surface and groundwaters to be completed. Impacts of human activity (industry, farming etc) to be identified. Economic analysis of water use to be completed. Location and boundaries of water bodies to be identified. Reference conditions for water status to be defined. Register of protected areas to be established.
2006	Environmental monitoring to be established and operational to ensure comprehensive view of water quality in each River Basin District. Work programme for production of River Basin Management Plans for each River Basin District to be published.
2007	Interim overview of the significant water management issues for each River Basin District to be published.
2008	Draft River Basin Management Plans to be published for consultation. Draft programmes of measures to be established in each RBD.
2009	River Basin Management Plans to be finalised and published. Programmes of measures to be established in each RBD to meet environmental objectives.
2010	Water pricing policies to be in place.
2012	Programmes of measures to be fully operational. Interim progress reports to be prepared on implementation of planned programmes of measures.
2015	Main environmental objectives to be met. River Basin Management Plans to be reviewed and updated every six years thereafter.

Executive Summary

This table lists the number of organisations that made submissions on the Draft RBMP, SEA and AA, the unique submission identification codes and number of pages per submission.

Table 2: Summary of Submissions

Submission			Target Document		
Reference Code	Organisation	# Page	RBMP	SEA	AA
001	Meath County Council	2	✓		
002	ERBD Advisory Council	3	✓		
003	DCC	1	✓		
004	DAFF	2	✓		
005	IFA	1	✓		
006	Noel O'Hara	1	✓		
007	William Hannon	1	✓		
008	River Vartry Protection Society	4	✓		
009	North Kildare Trout & Salmon Anglers Assoc.	1	✓		
010	Clane Trout & Salmon Anglers	3	✓		
011	Housing & Residential Services	1	✓		
012	EPA	2	✓		
013	Wicklow Anglers' Association	2	✓		
014	Rathdrum Trout Anglers & Environmental Club	2	✓		
015	Drogheda Port Company	3	✓		
016	Meath County Council	4	✓		
017	Dougal Cousins	1	✓		
018	Arklow Town Council	1	✓		
019	Bremore Ireland Port	1	✓		
020	Water Supply Project - Dublin Region	1	✓		
021	Dublin Port Company	56	✓		
022	Animal & Plant Health Association	3	✓		
023	Heritage Council	2	✓		
024	Industrial Heritage Association	1	✓		
025	Michael Gunn	2	✓		
026	Laois IFA	1	✓		
027	Aughrim & District Trout Angling	1	✓		
028	DEHLG	6		✓	✓
029	Dept. of Agriculture	17	✓		
030	ESB	2	✓		
031	Offaly County Council	15	✓		
032	Teagasc	22	✓		
033	Eastern Regional Fisheries Board	24	✓		
034	Irish Doctors Environmental Association	1	✓		
035	Central Fisheries Board	6	✓		
036	Irish Concrete Federation	4	✓		
037	OPW	2	✓		
038	Shay Murtagh Ltd.	14	✓		
039	National Roads Authority	2			
040	Independent Farmers Association	4	✓		

Submission			Target Document		
Reference Code	Organisation	# Page	RBMP	SEA	AA
041	Failte Ireland	6	✓		
042	Fingal County Council	18	✓	✓	✓
043	Kildare County Council	8	✓		
044	Waterways Ireland	3	✓		
045	Dodder Anglers Association	1	✓		
046	An Taisce	16	✓		
047	Wicklow County Council	2	✓		
048	Chambers Toxicological Consulting	3	✓		
049	IBEC	6	✓		
050	EPA	9	✓	✓	✓
051	Irish Creamery Milk Suppliers	1	✓		
052	Meath IFA	2	✓		
053	Dublin IFA	2	✓		
054	Bord Na Mona	12	✓		
055	Dublin City Council	38	✓		
056	DCENR	2		✓	
057	IFA	16	✓		
058	GSI	2	✓		
059	SWAN	34	✓		
060	Tim Gleeson	3	✓		
061	Wicklow IFA	4	✓		
062	Meath County Council	13	✓		
063	Westmeath County Council	9	✓		
064	Coillte	6	✓		

Key Issues

Submission	Pressure								
	Wastewater from Industrial Discharges	Quarries, Mines & Landfills	Agriculture	Wastewater from unsewered properties	Forestry	Dangerous Substances	Abstractions	Morphology	Other
Meath County Council	1		1			1	4		8
ERBD Advisory Council	1							3	1
DCC									11
DAFF								1	5
IFA			2						2
Noel O'Hara		1							
William Hannon		1							
River Vartry Protection Society		1					1		1
North Kildare Trout & Salmon Anglers Assoc.	1							3	1
Clane Trout & Salmon Anglers	1							3	1
Housing & Residential Services									1
EPA	1		1						2
Wicklow Anglers' Association		1							
Rathdrum Trout Anglers & Environmental Club		1							
Drogheda Port Company								1	
Meath County Council	3		3	3			1		4
Dougal Cousins									1
Arklow Town Council	1	1							
Bremore Ireland Port								1	
Water Supply Project - Dublin Region							1		
Dublin Port Company								4	
Animal & Plant Health Association					1	9			
Heritage Council			1				1	1	4
Industrial Heritage Association									1
Michael Gunn	2								1
Laois IFA			9						
Aughrim & District Trout Angling		1							
DEHLG									1
Dept. of Agriculture			4		2	1		1	4
ESB								1	
Offaly County Council		1	2						6
Teagasc			1		3				

Submission	Pressure								
	Wastewater from Industrial Discharges	Quarries, Mines & Landfills	Agriculture	Wastewater from unsewered properties	Forestry	Dangerous Substances	Abstractions	Morphology	Other
Eastern Regional Fisheries Board	2	1		1	2		4	1	45
Irish Doctors Environmental Association	1								1
Central Fisheries Board									2
Irish Concrete Federation							1		2
OPW								1	1
Shay Murtagh Ltd.							1		
National Roads Authority							1		
Independent Farmers Association	1								1
Failte Ireland									2
Fingal County Council		1	1	2			1	4	29
Kildare County Council	2		1						2
Waterways Ireland									2
Dodder Anglers Association								2	
An Taisce		1	4		2	2	5	2	26
Wicklow County Council									7
Chambers Toxicological Consulting							1		4
IBEC							1		7
EPA	2		2						24
Irish Creamery Milk Suppliers			1						
Meath IFA			4		1				1
Dublin IFA			4		1				1
Bord Na Mona									15
Dublin City Council									21
DCENR							1	2	6
IFA			4		3		1		8
GSI				1			2		8
SWAN	4	4	2	5	5	2	15	4	59
-			4						
Wicklow IFA			1						11
Meath County Council	4		5	5			1	1	14
Westmeath County Council									8
Coillte									1
Totals	27	15	57	17	20	15	43	36	363

Submissions by Pressure

Wastewater from Municipal Industrial Discharges

Issue	Organisation Name	Submission Code ERBD_RBMP	Comment Code ERBD_RBMP	Description	Where Addressed	Section number in the plan
Typographical / Presentation	Meath County Council	001	001_c002	Page 21,Map7. The Blackwater South WMU looks like it has a very big WwTP/industrial discharge pressure. Meath has the WMU at 40% WwTP/discharges while Kildare has it at 70% WwTP discharges. Net effect is that Blackwater South WMU looks like it is most impacted by WwTP/discharges in Meath of all rivers which would not be representative.	Map will be reviewed.	Mapping
Measure	ERBD Advisory Council	002	002_c002	A POM for the Liffey WMU is questioned. Good ecological potential is questioned as strong effluent is discharged into the Liffey from WwTP in Kildare.	GEP has been confirmed.	Section 7/ Section 9/ Section 10/ POM
Measure	North Kildare Trout and Salmon Anglers	009	009_c002	A POM for the Liffey WMU is questioned. Good ecological potential is questioned as strong effluent is discharged into the Liffey from WwTP in Kildare.	GEP has been confirmed.	Section 7/ Section 9/ Section 10/ POM
Measure	Clane & Trout Salmon Anglers	010	010_c002	A POM for the Liffey WMU is questioned. Good ecological potential is questioned as strong effluent is discharged into the Liffey from WwTP in Kildare.	GEP has been confirmed.	Section 7/ Section 9/ Section 10/ POM
Measure	EPA	012	012_c002	The correct operation and upgrade, where necessary, of Urban waste water treatment plants.	To be included in the plan.	Section 7/ Section 9/ Section 10/ POM
Implementation	Meath County Council	016	017_c001	Municipal WwTP. All of the following plants are in service and are generally deficient and require upgrade and/or expansion. : Kells, Kells IDA (possible connection to Kells), Oldcastle, Kildalkey, Stamullen, Crosskiel, Nobber, Kentstown, Dunderry, Drumcondrath, Rathmolyon.	Responsibility of Meath County Council.	Section 10 POM
Implementation	Meath County Council	016	017_c002	Smaller WWTPs .In 2007 - 2013 assessment of needs the following plants were recommended for upgrade/expansion. Ardcah, Ballinabrackey, Batterstown, Bellewstown, Bohermeen, Carnaross, Castlejordan, Clonalvey,Lobinstown.	Responsibility of Meath County Council.	Section 10
Implementation	Meath County Council	016	017_c010	Sludge. Sludge mgt plans will be required for the disposal of municipal wastes, IPPC, pig, poultry.	Responsibility of Meath County Council.	Section 10

Issue	Organisation Name	Submission Code ERBD_RBMP	Comment Code ERBD_RBMP	Description	Where Addressed	Section number in the plan
Implementation	Arklow Town Council	018	018_c001	Avoca River must be cleaned up. Arklow Town Council put forward plans to clean up the estuary by removing some 26 outlets.	It is technically infeasible to remediate the whole of the Avoca river by 2015. 2027 is a more realistic timeline for this.	Section 10
Exemption	Public	025	025_c002	Table 27. Explain reason for exemption of the Boyne more clearly. Mention inadequate WWTPs as reason. Elaborate more on the influence of human waste rather than diffuse agricultural pollution.	More detail to be included in the plan.	Section 10
Data	Public	025	025_c008	P60Q7. More could be done in relation to outflows.	Observation.	Section 3/ Section 10
Regulation	ERFB	033	033_c001	Licensing of WwTPs and Industrial facilities. Licenses must be informed by fisheries and other relevant legislation.	Matter for the EPA and Local Authorities.	Section 7
Data	ERFB	033	033_c003	Osberstown and Kells WwTp must be prioritised in the plan.	Programme funding is a matter for the DEHLG.	Section 3/ Section 10
Regulation	Irish Doctors Environmental Association	034	034_c001	Arklow - inadequate treatment of wastewater.	Arklow WwTW included in the Plan	Section 7
Regulation	Central Fisheries Board	035	035_c003	SACs - stricter ELVs as local authorities sewage outfalls discharge to waters designate as SACs.	Matter for DEHLG, NPWS.	Section 7
Regulation	Independent Farmer Federation	040	040_c001	Municipal Waste Water Treatment plant/sewage sludge application on lands should be banned as a public health safeguard. This should be noted in the RBMP.	Responsibility of DEHLG.	Section 7
Exemption	Kildare County Council	043	043_c014	For water bodies at moderate or poor status a derogation in respect of the 2015 deadline is sought. These are outlined on pg 3 of 8 in submission.	Exemption is only permitted for reasons of technical infeasibility or disproportionate cost	Section 10
Exemption	Kildare County Council	043	043_c015	Where WwTP have been identified as pressures, planned improvement works are scheduled for end of first cycle. An extended timeframe is sought for these as shown in table on pg 3 of 8.	Exemption is only permitted for reasons of technical infeasibility or disproportionate cost	Section 10
Data	EPA	050	050_c015	Wastewater and industrial discharge. Permits should be required to take account of environmental objectives of the plan. Emphasise new environmental quality standards as published in European Communities Environmental Objectives.	Will be included if transposed in time by Irish regulations.	Section 3/ Section 10
Data	EPA	050	050_c019	Proposed Measures. A prioritised list of Urban WwTPs in the ERBD, requiring and upgrade or improved operation be listed in tabular form.	A list will be provided in accordance with current publication.	Section 9

Issue	Organisation Name	Submission Code ERBD_RBMP	Comment Code ERBD_RBMP	Description	Where Addressed	Section number in the plan
Policy	SWAN	059	059_c001	No new developments should be permitted unless adequate sewage treatment capacity is in place before permission is granted.	Dealt with via GDSDS & CDPs.	Section 7/ Section 8/ Section 10/
Policy	SWAN	059	059_c002	For new settlements, isolated gated communities and other isolated commercial developments, waste treatment facilities must not be permitted to discharge to watercourses but should be impounded and transported direct to wastewater treatment plants.	Dealt with in planning policies & city/county development plans.	Section 7/ Section 8/ Section 10
Policy	SWAN	059	059_c003	DEHLG must resource sewage treatment capacity to handle the additional load created by requirements to de-sludge septic tanks.	Extra capacity for sludge mgmt to be considered in the section of the plan dealing with treatment plants.	Section 7/ Section 8/ Section 10
Policy	SWAN	059	059_c004	The Plan must set out clearly the measures to be taken to tackle heightened hormone levels in water bodies.	Addressed.	Section 7
Implementation	Meath County Council	062	062_c005	Athboy - Proposed exemption to 2021 welcomed. Upgrade of Athboy WWTP at advanced stage. Kildalkey WWTP not on Meath County Council list of needs. Diffuse agricultural pressures are being inspected with improvement being made.	Critical Dependencies.	Section 10
Implementation	Meath County Council	062	062_c006	Boyne Lower. Proposed exemption welcomed to 2027. Lower Boyne drains a large area encompassing parts of 6 counties. A need for LAs to work together. 5 schemes are at an advanced stage namely: Athboy, Donore, Moynalty, Rathmolyon and Summerhill. Also Kells & Navan will be upgraded.	Critical Dependencies.	Section 10
Implementation	Meath County Council	062	062_c023	Nanny experiences many problems from industrial sources, agriculture, septic tanks etc and also abstractions. Meath awaits results of detailed ground water abstraction.	Critical Dependencies.	Section 10
Implementation	Meath County Council	062	062_c028	Stoneyford - Meath County Council welcomes exemption to 2021. Meath will require assistance from Westmeath to eliminate point source pressure from Ballivor WWTP.	Critical Dependencies.	Section 10

Submissions by Pressure Quarries, Mines & Landfills

Issue	Organisation Name	Submission Code ERBD_RBMP	Comment Code ERBD_RBMP	Description	Where Addressed	Section number in the plan
Implementation	Public	006	006_c001	Objection to the derogation of the Avoca River.	It is technically infeasible to remediate the Avoca river by 2015 because of pollution by overland flow and groundwater. 2027 is a realistic timeline.	Section 10
Implementation	Public	007	007_C001	Objection to the derogation of the Avoca River.	It is technically infeasible to remediate the Avoca river by 2015 because of pollution by overland flow and groundwater. 2027 is a realistic timeline.	Section 10
Implementation	River Vartry Protection Society	008	008_c003	Objection to the derogation on the Avoca River.	It is technically infeasible to remediate the Avoca river by 2015 because of pollution by overland flow and groundwater. 2027 is a realistic timeline.	Section 10
Implementation	Co Wickow Anglers Association	013	013_c001	Objection to derogation sought for Avoca River.	It is technically infeasible to remediate the Avoca river by 2015 because of pollution by overland flow and groundwater. 2027 is a realistic timeline.	Section 10
Implementation	Rathdrum Trout and Anglers Association	014	014_c001	Objection to derogation sought for Avoca River.	It is technically infeasible to remediate the Avoca river by 2015 because of pollution by overland flow and groundwater. 2027 is a realistic timeline.	Section 10
Implementation	Arklow Town Council	018	018_c001	Avoca River must be cleaned up. Arklow Town Council put forward plans to clean up the estuary by removing some 26 outlets.	It is technically infeasible to remediate the Avoca river by 2015 because of pollution by overland flow and groundwater. 2027 is a realistic timeline.	Section 10

Issue	Organisation Name	Submission Code ERBD_RBMP	Comment Code ERBD_RBMP	Description	Where Addressed	Section number in the plan
Implementation	Aughrim & District Trout Angling & Conservation Club	027	027_c001	Objects strongly to the derogation of the Avoca River.	It is technically infeasible to remediate the Avoca river by 2015 because of pollution by overland flow and groundwater. 2027 is a realistic timeline.	Section 10
Exemption	Offaly County Council	031	030_c006	An exemption is sought for peat lands in Offaly due to naturally occurring ammonia found in them.	Plan modified	Section 10
Implementation	ERFB	033	033_c005	Avoca River- objection to derogation.	Require funding for further investigations. Heritage issues yet to be resolved.	Section 10
Data	Fingal County Council	042	042_c025	Map 10 pg 30 relates to environmental pressures caused by landfills. Balleally landfill at Rush/ Lusk and its impact on the Rogerstown Estuary is not indicated on the map.	To be reviewed in the plan.	Section 4
Data	An Taisce	046	046_c012	Avoca river not just at risk from the mines but also Ballymurtagh landfill, Schering Plough factory, forestry, acid water from upstream mines and the Arklow wastewater treatment plant. All problems should be exposed.	Highlighted in the plan.	Section 3
Policy	SWAN	059	059_c005	More detail with regard to addressing pollution from these sites is required. Threats from landfill leachate were a particular concern to participants.	Plan will require compliance with the landfill Directive. A case by case basis will be required.	Section 7/ Section 8/ Appendices
Data	SWAN	059	059_c081	The anticipated report on the AVOCA area has not been issued, and is therefore assumed not to inform the Plan. Why?	Issue of report is a matter for the DEMNR. Preliminary findings have been reviewed.	Section 3
Data	SWAN	059	059_c083	The "problem" of the mines in Avoca is perceived as being used as a blanket for a wide range of issues including those associated with the Ballymurtagh landfill (located on old mines), Schering Plough factory, forestry, acid water from upstream mines, and the Arklow wastewater treatment plant. More detail is required to ensure that all these issues are being dealt with appropriately.	The Avoca will be managed as a river basin in line with the philosophy of the WFD.	Section 3
Economic	SWAN	059	059_c085	If problems like the Avoca mines are too costly for the local authorities/government involved, is there a case to be made for establishing a European fund as in the Federal US "Superfund" to support rehabilitation of such sites (e.g. Love Canal)?	Matter for the DEHLG/ DEMNR.	Section 11

Submissions by Pressure

Agriculture

Issue	Organisation Name	Submission Code ERBD_RBMP	Comment Code ERBD_RBMP	Description	Where Addressed	Section number in the plan
Measure	Meath County Council	001	001_c015	Agricultural measures. Resource limitations. Premature to introduce supplementary measures as basic measures not fully implemented.	Supplementary measures are judged necessary at specific sites; ERBD approach is to use pilots to ascertain need for future measures.	Section 7/ Section 9/ Section 10/ Appendices
Measure	IFA	005	005_c002	Agricultural Measures. Not in agreement with supplementary dealing with agriculture.	Supplementary measures are judged necessary at specific sites; ERBD approach is to use pilots to ascertain need for future measures.	Section 7/ Section 9/ Section 10/ Appendices
Economic	IFA	005	005_c003	Riparian Buffers. Such riparian buffers would result in stocking level restrictions and a financial loss of income. This cost must be quantified.	Economic costs included.	Section 10
Measure	EPA	012	012_c003	Use of Farm Inspections to control agricultural wastes.	To be included in the plan.	Section 7/ Section 9/ Section 10/ Appendices
Implementation	Meath County Council	016	017_c003	Agriculture.4000 farms in Meath. Will require assistance from Dept of Agriculture and Teagasc to resolve pollution problems from farms.	Responsibility of Meath County Council, DAFF	Section 10
Implementation	Meath County Council	016	017_c010	Sludge. Sludge mgt plans will be required for the disposal of municipal wastes, IPPC, pig, poultry.	Responsibility of Meath County Council, DAFF	Section 10
Implementation	Meath County Council	016	017_c012	Habitats. Riparian Zones.	Responsibility of Meath County Council.	Section 10
Measure	The Heritage Council	023	023_c002	Agriculture. Council Carrying out High Nature Value Farming. This may contribute to shaping supplementary measures.	Information not readily available.	Section 7/ Section 9/ Section 10/ Appendices
Measure	Laois IFA	026	026_c001	IFA reject: Increased inspections by Local Authorities & EPA.	Supplementary measures are judged necessary at specific sites; ERBD approach is to use pilots to ascertain need for future measures.	Section 7/ Section 9/ Section 10/ Appendices

Issue	Organisation Name	Submission Code ERBD_RBMP	Comment Code ERBD_RBMP	Description	Where Addressed	Section number in the plan
Measure	Laois IFA	026	026_c002	IFA reject: Creating increased buffer strips.	Supplementary measures are judged necessary at specific sites; ERBD approach is to use pilots to ascertain need for future measures.	Section 7/ Section 9/ Section 10/ Appendices
Measure	Laois IFA	026	026_c003	IFA rejects: Setting aside lands.	Supplementary measures are judged necessary at specific sites; ERBD approach is to use pilots to ascertain need for future measures.	Section 7/ Section 9/ Section 10/ Appendices
Measure	Laois IFA	026	026_c004	IFA rejects: Reducing Stocking density.	Supplementary measures are judged necessary at specific sites; ERBD approach is to use pilots to ascertain need for future measures.	Section 7/ Section 9/ Section 10/ Appendices
Measure	Laois IFA	026	026_c005	IFA rejects: Reducing levels of land reclamation.	Supplementary measures are judged necessary at specific sites; ERBD approach is to use pilots to ascertain need for future measures.	Section 7/ Section 9/ Section 10/ Appendices
Measure	Laois IFA	026	026_c006	IFA rejects: requiring nutrient management planning.	Supplementary measures are judged necessary at specific sites; ERBD approach is to use pilots to ascertain need for future measures.	Section 7/ Section 9/ Section 10/ Appendix 2/ Appendix 3
Measure	Laois IFA	026	026_c007	IFA rejects: stricter storage or closed periods.	Supplementary measures are judged necessary at specific sites; ERBD approach is to use pilots to ascertain need for future measures.	Section 7/ Section 9/ Section 10/ Appendices
Measure	Laois IFA	026	026_c008	IFA rejects: Relocation by using digesters in areas where nutrient surplus or tinkering in areas of nutrient surplus.	Supplementary measures are judged necessary at specific sites; ERBD approach is to use pilots to ascertain need for future measures.	Section 7/ Section 9/ Section 10/ Appendices

Issue	Organisation Name	Submission Code ERBD_RBMP	Comment Code ERBD_RBMP	Description	Where Addressed	Section number in the plan
Measure	Laois IFA	026	026_c009	IFA rejects: any proposal to prevent farmers from using watercourses for livestock under REPS.	Supplementary measures are judged necessary at specific sites; ERBD approach is to use pilots to ascertain need for future measures.	Section 7/ Section 9/ Section 10/ Appendices
Measure	DAFF	029	029_c001	DAFF are strongly opposed to the introduction of supplementary measures prior to the finding of EPA review of the European Communities (Good Agricultural Practice for protection of waters) Regulations and the findings of the DAFF Agricultural Mini-Catchment Programme.	Much included in REPS and is therefore part of good farming practices.	Section 7/ Section 9/ Section 10/ Appendices
Measure	DAFF	029	029_c002	DAFF are strongly opposed to 'over grazing remediation' as a supplementary measure.	Will be reviewed.	Section 7/ Section 9/ Section 10/ Appendices
Measure	DAFF	029	029_c006	DAFF are strongly opposed to supplementary measures specifically outlined in the EBMP AS Nitrates Action Plan has yet to be reviewed. Other outlined in Annex 2. (1) Proposed measure in chapter 10. Introduce Agricultural Bye-Laws through water pollution Act 1977 to eliminate animal access to watercourses. Enforce new bye-law. Proposed supplementary measures listed in Annex B of the ERBD plan, (2) Restrict cattle access to rivers - create cattle dinking points. (3)Dept of Ag - code of Good Practice and Guidelines on the Use of Biosolids in Agriculture, 1999, (3) Riparian buffers, (4) DAFF restoration works on intensive land use for FW Morphology, (5) Evaluate bog impact.	Supplementary measures are judged necessary at specific sites; ERBD approach is to use pilots to ascertain need for future measures.. Many of the supplementary measures are in REPS which is viewed as good farming practice.	Section 7/ Section 9/ Section 10/ Appendices
Regulation	DAFF	029	029_c007	Code of Good Practice on the Use of Biosolids in Agriculture, 1999 is erroneous. This code was introduced by the DEHLG.	Plan will be amended.	Section 7
Measure	Offaly County Council	031	030_c008	Upper Boyne Pilot- minimum 3m riparian buffer zone planted would be effective in preventing fertiliser being spread into streams.	Included in the plan.	Section 7/ Section 9/ Section 10/ Appendix 2/ Appendix 3
Measure	Offaly County Council	031	030_c009	An alternative method of water cattle (nose pump); rather allowing access to the rivers should be considered.	Included in the plan.	Section 7/ Section 9/ Section 10/ Appendices

Issue	Organisation Name	Submission Code ERBD_RBMP	Comment Code ERBD_RBMP	Description	Where Addressed	Section number in the plan
Implementation	Teagasc	032	032_c001	Concern that if the lag time between implementation of agricultural environmental measures and the improvement of water quality, is not sufficiently accounted for, the plans may prematurely accommodate supplementary measures for the agricultural sector.	Timescale is not ambitious in the ERBD. Supplementary measures are judged necessary at specific sites; ERBD approach is to use pilots to ascertain need for future measures.	Section 10
Regulation	Central Fisheries Board	035	035_c002	Good Agricultural Practice Regulations, 2009. Fears that the slurry storage periods prescribed will be inadequate to protect salmonid waters.	Matter for DAFF.	Section 7
Measure	Fingal County Council	042	041_c019	Basic Measure ' Good Agricultural Practice' has been updated in 2008.	Plan amended.	Section 7/ Section 9/ Section 10/ Appendices
Measure	Kildare County Council	043	043_c012	A measure to address the issue of siltation in rivers in certain water bodies caused by overland sediment run-off from lands ploughed to the river bank should be included in the plan.	Measures relating to riparian buffers including in plan.	Section 7/ Section 9/ Section 10/ Appendices
Implementation	An Taisce	046	046_c007	Review of Agricultural practices (Nitrates regulations). The synchronisation of the regulations and the Plans is unlikely to coincide.	Different timescales. Cannot be avoided.	Section 10
Measure	An Taisce	046	046_c028	Biodigestors - unless deemed unfeasible for clear technical reasons should be examined to reduce spreading of pig slurry.	To be considered in the plan.	Section 7/ Section 9/ Section 10/ Appendices
Measure	An Taisce	046	046_c029	Incorporate a special incentive into REPS for the appropriate mgmt of water dependent habitats on farms.	Matter for DAFF and Teagasc.	Section 7/ Section 9/ Section 10/ Appendices
Measure	An Taisce	046	046_c041	Horticulture- specific measures to address horticulture need to be included in the plan.	Covered by basic measures.	Section 7/ Section 9/ Section 10/ Appendices
Data	EPA	050	050_c013	NAP main instrument for tackling diffuse agric pollution. NAP could be detailed more in the plan.	Will be included.	Section 3/ Section 10
Implementation	EPA	050	050_c014	Programme for farm inspections to control agricultural waste should be set out.	Will be included if available from Local Authorities and DAFF.	Section 10

Issue	Organisation Name	Submission Code ERBD_RBMP	Comment Code ERBD_RBMP	Description	Where Addressed	Section number in the plan
Measure	ICMSA	051	051_c001	Believes that 2006 Nitrate regulations more than adequately represents farmers contribution to good water status achievement- no further supplementary measures should be made on the sector.	Supplementary measures are judged necessary at specific sites; ERBD approach is to use pilots to ascertain need for future measures.	Section 7/ Section 9/ Section 10/ Appendices
Implementation	Meath Farmers Association	052	052_c001	RBMP must not exceed the Nitrates Regulations. Water quality improves over decades rather than years.	Supplementary measures are judged necessary at specific sites; ERBD approach is to use pilots to ascertain need for future measures.	Section 10
Measure	Meath Farmers Association	052	052_c002	Supplementary measures - premature and excessive to propose.	Supplementary measures are judged necessary at specific sites; ERBD approach is to use pilots to ascertain need for future measures.	Section 7/ Section 9/ Section 10/ Appendices
Economic	Meath Farmers Association	052	052_c003	190 million euros spend by farmers in ERBD on improvements to comply with nitrates regulations and the WFD.	Matter for DAFF and DEHLG.	Section 10
Regulation	Meath Farmers Association	052	052_c004	Duplication of on farm inspectorate - IFA welcomes agreement between DAFF and DoE which will end in duplicate inspections by both departments and result in just DAFF undertaking WFD on -farm inspections under the nitrates regulations. This agreement must be communicated to and enacted by all County Councils and public bodies.	Outside the scope of the Plan; increased farm inspections will require stronger coordination between DAFF and LAs	Section 7
Implementation	Dublin Farmers Association	053	053_c001	RBMP must not exceed the Nitrates Regulations. Water quality improves over decades rather than years.	Supplementary measures are judged necessary at specific sites; ERBD approach is to use pilots to ascertain need for future measures.	Section 10
Measure	Dublin Farmers Association	053	053_c002	Supplementary measures - premature and excessive to propose.	Supplementary measures are judged necessary at specific sites; ERBD approach is to use pilots to ascertain need for future measures.	Section 7/ Section 9/ Section 10/ Appendices
Economic	Dublin Farmers Association	053	053_c003	190 million euros spend by farmers in ERBD on improvements to comply with nitrates regulations and the WFD.	Matter for DAFF and DEHLG.	Section 10

Issue	Organisation Name	Submission Code ERBD_RBMP	Comment Code ERBD_RBMP	Description	Where Addressed	Section number in the plan
Regulation	Dublin Farmers Association	053	053_c004	Duplication of on farm inspectorate - IFA welcomes agreement between DAFF and DoE which will end in duplicate inspections by both departments and result in just DAFF undertaking WFD on -farm inspections under the nitrates regulations. This agreement must be communicated to and enacted by all County Councils and public bodies.	Outside the scope of the Plan; increased farm inspections will require stronger coordination between DAFF and LAs	Section 7
Implementation	Irish Farmers Association	057	057_c001	RBMP must not exceed the Nitrates Regulations. Water quality improves over decades rather than years.	Supplementary measures are judged necessary at specific sites; ERBD approach is to use pilots to ascertain need for future measures.	Section 10
Measure	Irish Farmers Association	057	057_c002	Supplementary measures - premature and excessive to propose.	Supplementary measures are judged necessary at specific sites; ERBD approach is to use pilots to ascertain need for future measures.	Section 7/ Section 9/ Section 10/ Appendices
Economic	Irish Farmers Association	057	057_c003	190 million euros spent by farmers in the ERBD on improvements to comply with nitrates regulations and the WFD.	Matter for DAFF and DEHLG.	Section 10
Regulation	Irish Farmers Association	057	057_c004	Duplication of on farm inspectorate - IFA welcomes agreement between DAFF and DoE which will end in duplicate inspections by both departments and result in just DAFF undertaking WFD on -farm inspections under the nitrates regulations. This agreement must be communicated to and enacted by all County Councils and public bodies.	Outside the scope of the plan.	Section 7
Regulation	SWAN	059	059_c006	IF DAFF are to take responsibility for enforcing the GAPP regulations, DEHLG must retain an overseeing role in ensuring this is carried out correctly and effectively and is not in any way influenced by DAFF's close relationship and affinity with the agriculture sector.	Interdepartmental government structure issue.	Section 7
Economic	SWAN	059	059_c007	The potential for funding of water protection measures through the Rural Development Programme (Department of Community, Rural & Gaeltacht Affairs, 2006) should also be recognised in the Plan and a proposal to explore opportunities put forward.	To be included under agricultural pressures.	Section 10
Measure	Public	060	060_c001	Believes well meaning but poorly guided environmentalists have over rated the risk of pollution from agriculture to both surface water and GW.	Agriculture poses a significant risk to water quality.	Section 7/ Section 9/ Section 10/ Appendices

Issue	Organisation Name	Submission Code ERBD_RBMP	Comment Code ERBD_RBMP	Description	Where Addressed	Section number in the plan
Data	Public	060	060_c002	Has concerns over the understanding of nutrient flow in soils (particularly unsaturated) that led to the risk assessment of agriculture and pollution to groundwater, same in surface water.	Agriculture poses a significant risk to water quality.	Section 3/ Section 10
Data	Public	060	060_c003	Mentions confusion between water logged and saturated soil when assessing risk of agricultural practices to surface waters.	Agriculture poses a significant risk to water quality.	Section 3/ Section 10
Implementation	Public	060	060_c004	Believes that most farm pollution originates for insufficient farm storage-need simple cost effective liquid manure storage to eliminate pollution from agriculture.	Considered in supplementary measures. Supplementary measures are judged necessary at specific sites; ERBD approach is to use pilots to ascertain need for future measures.	Section 10
Measure	IFA-WICKLOW	061	061_c011	Q12 Focus seems tilted towards agricultural and economic activity while urban and domestic impacts seem to be secondary, still many discharges from domestic dwellings and inadequate WWTPS.	Agriculture poses a risk to water quality.	Section 7/ Section 9/ Section 10/ Appendices
Implementation	Meath County Council	062	062_c008	Boyne Lower- cattle access to tributaries may need to be further examined.	Critical Dependencies.	Section 10
Implementation	Meath County Council	062	062_c019	Mattock - Meath welcomes exemption to 2021. Meath will require aid from EPA to solve pressure like intensified pig farming units.	Critical Dependencies.	Section 10
Implementation	Meath County Council	062	062_c020	Mosney - Meath welcomes exemption to 2021. Meath will require assistance from DAFF to solve issues of diffuse agricultural pollution in this catchment.	Critical Dependencies.	Section 10
Implementation	Meath County Council	062	062_c023	Nanny experiences many problems from industrial sources, agriculture, septic tanks etc and also abstractions. Meath awaits results of detailed ground water abstraction.	Critical Dependencies.	Section 10
Implementation	Meath County Council	062	062_c025	Ryewater - ERBD MMU helped highlighted substantial agricultural diffuse and point source pressure.	Critical Dependencies.	Section 10

Submissions by Pressure

Wastewater from unsewered properties

Issue	Organisation Name	Submission Code ERBD_RBMP	Comment Code ERBD_RBMP	Description	Where Addressed	Section number in the plan
Implementation	Meath County Council	016	017_c004	Septic tanks. 18,000 septic tank or onsite WWTPs . Significant problem in poorly drained soils of Ashborne, Dun shaughlin, Kilbride. Solution to problem not yet known. New panel of assessors drafted to assess planning applications.	Responsibility of Meath County Council.	Section 10
Implementation	Meath County Council	016	017_c005	Planning. Planning departments must be diligent when considering planning applications. Onus on them to ensure receiving waters has sufficient assimilative capacity.	Responsibility of Meath County Council.	Section 10
Implementation	Meath County Council	016	017_c008	Urban Diffuse. Misconnections to be investigated where found to be causing an impact.	Responsibility of Meath County Council.	Section 10
Regulation	ERFB	033	033_c008	Unsewered properties -enforcement. Direct discharge to SW where septic tanks have been constructed at unsuitable locations such as those characterised by heavy impermeable soils in the vicinity of watercourses.	Subject to LA resources.	Section 7
Measure	Fingal County Council	042	041_c020	Supplementary POM - Alternative Supplementary Measure ' Include inspection of septic tanks and treatment system for single houses'.	To be considered in the plan.	Section 7/ Section 9/ Section 10/ Appendices
Measure	Fingal County Council	042	041_c021	Donabate - WMU supplementary measures should include mention of FOGS programme which in terms of sustainable commercial water use and improved water infrastructure.	Measures made on WMU level and not at water body level.	Section 7/ Section 9/ Section 10/ Appendices
Data	GSI	058	058_c002	Methodology to assess the cumulative impact on GW quality of discharges to GW would be useful (Septic tanks etc) - the documentation produced would help assess impacts and guide planning.	Matter for Local Authorities and EPA.	Section 3/ Section 10
Measure	SWAN	059	059_c008	Support measures for alternative systems such as subsidies on new tanks or treatment systems, or connection to municipal sewerage schemes where possible should be provided.	Departmental funding matter.	Section 7/ Section 9/ Section 10/ Appendices
Policy	SWAN	059	059_c009	Proprietary treatment systems must be mandatory in all permissions for new one-off housing where soil percolation / assimilative capacity is insufficient.	Proprietary systems may be inappropriate.	Section 7/ Section 8/ Section 10/ Appendices

Issue	Organisation Name	Submission Code ERBD_RBMP	Comment Code ERBD_RBMP	Description	Where Addressed	Section number in the plan
Regulation	SWAN	059	059_c010	Bye-laws (as in County Cavan) requiring certified annual de-sludging of septic tanks must be mandatory.	Matter for specific county council.	Section 7
Implementation	SWAN	059	059_c011	A modest grant scheme to support the obligatory replacement of demonstrably failing septic tanks must be initiated in Protected Areas.	Departmental funding matter.	Section 10/
Policy	SWAN	059	059_c012	Site assessment should independently carried out, commissioned by the planning authorities in the case of private developments in order to avoid unduly pressure on companies doing site assessments.	Matter for planning authority.	Section 7/ Section 8/ Section 10/ Appendices
Implementation	Meath County Council	062	062_c001	Rural Settlement: Meath County Council has categorised rural area types into 3 area types. Namely rural areas namely rural areas under strong urban influence, strong rural areas and low development pressure areas. Specific technical requirements with respect to the one off houses within these 3 rural areas have been adopted in the CDP.	Critical Dependencies.	Section 10
Implementation	Meath County Council	062	062_c002	It is envisaged that the county development plan has addressed unsewered pressures going forward.	Critical Dependencies.	Section 10
Implementation	Meath County Council	062	062_c011	Broadmeadow- contain poorly drained soils and is under significant pressure from diffuse septic tanks, diffuse urban pollution and naturally high phosphorus in the ground.	Critical Dependencies.	Section 10
Implementation	Meath County Council	062	062_c015	Broadmeadow - Meath County Council continue to monitor point sources.	Critical Dependencies.	Section 10
Implementation	Meath County Council	062	062_c023	Nanny experiences many problems from industrial sources, agriculture, septic tanks etc and also abstractions. Meath awaits results of detailed ground water abstraction.	Critical Dependencies.	Section 10

Submissions by Pressure

Forestry

Issue	Organisation Name	Submission Code ERBD_RBMP	Comment Code ERBD_RBMP	Description	Where Addressed	Section number in the plan
Regulation	Animal and Plant Health Association Ltd.	022	022_c007	S9 - Pesticide Use- gives an impression that farmers and land owners overuse pesticides- financial constraints mean this is not true.	Comment does not refer to ERBD Plan.	Section 7
Measure	DAFF	029	029_c016	National Forestry Supplementary Measure- maintain registers of pesticide use. End users of plant protection products for professional use already legally required to maintain records under SI No 381 of 2006.	Will be included in basic measures.	Section 7/ Section 9/ Section 10/ Appendices
Measure	DAFF	029	029_c017	National Forestry Supplementary Measure - develop biological control methods. National Action Plan to promote the sustainable use of pesticides will encourage the use of non chemical methods of plant protection etc.	NAP (pesticides) can be incorporated in the next cycle of the plan.	Section 7/ Section 9/ Section 10/ Appendices
Measure	Teagasc	032	032_c002	POMS for forestry should be spatially targeted at high-risk sites and activities. Instead of blanket measures.	Measures conform with DAFF guidance.	Section 7/ Section 9/ Section 10/ Appendices
Measure	Teagasc	032	032_c003	POMS for forestry should only be introduced following catchment specific evaluations of the cost effectiveness of proposed measures.	Measures conform with DAFF guidance.	Section 7/ Section 9/ Section 10/ Appendices
Policy	Teagasc	032	032_c004	Acidification Protocol - any change should be scientifically based.	Matter for DAFF.	Section 7/ Section 8/ Section 10/ Appendices
Policy	ERFB	033	033_c010	Forestry - pre 1990 plantations and upland sites most problematic due to lack of mgt. Board recommends that a precondition to planning on such sites that proper mgt be carried out.	Local Authority planning issue.	Section 7/ Section 8/ Section 10/ Appendices
Policy	ERFB	033	033_c011	Forest Service Codes - the issue of replanting commercial forestry in acid sensitive areas has not been addressed. (outlines problem with acidification in Gleanealo River).	Forest Service to review guidance of forestry in acid sensitive areas.	Section 7/ Section 8/ Section 10/ Appendices

Issue	Organisation Name	Submission Code ERBD_RBMP	Comment Code ERBD_RBMP	Description	Where Addressed	Section number in the plan
Measure	Central Fisheries Board	035	035_c001	Forest Management Plans - there is a need to realign forest mgt plans to ensure supplementary measures to forestry are applied.	Matter for DAFF.	Section 7/ Section 9/ Section 10/ Appendices
Measure	An Taisce	046	046_c030	Problems associated with forestry have been simplified by the plan. e.g acidification and causes of by different species.	To be considered in the plan.	Section 7/ Section 9/ Section 10/ Appendix 2/ Appendix 3
Measure	An Taisce	046	046_c031	Sensitive areas - more stringent measures required in more sensitive areas and does the plan tackle wider issues of water deterioration from forestry outside of prioritised areas.	Sensitive areas must be prioritised.	Section 7/ Section 9/ Section 10/ Appendices
Measure	Meath Farmers Association	052	052_c005	IFA recommends that the forest service, Code of Best Forest Practice and the Forest and Water Quality, Forest Harvesting and the Environment and Forestry and AERIAL Fertilisation Guidelines are sufficient to satisfy WFD. Further research is required prior to introduction of forestry supplementary measures.	Supplementary measures are judged necessary at specific sites; ERBD approach is to use pilots to ascertain need for future measures.	Section 7/ Section 9/ Section 10/ Appendices
Measure	Dublin Farmers Association	053	053_c005	IFA recommends that the forest service, Code of Best Forest Practice and the Forest and Water Quality, Forest Harvesting and the Environment and Forestry and AERIAL Fertilisation Guidelines are sufficient to satisfy WFD. Further research is required prior to introduction of forestry supplementary measures.	Supplementary measures are judged necessary at specific sites; ERBD approach is to use pilots to ascertain need for future measures.	Section 7/ Section 9/ Section 10/ Appendices
Measure	Irish Farmers Association	057	057_c011	No supplementary measures should be introduced unless the effect of water quality is known and can be directly related to forestry.	Measures driven by status; where status is derived from extrapolated data monitoring is recommended as the first action.	Section 7/ Section 9/ Section 10/ Appendices
Measure	Irish Farmers Association	057	057_c012	IFA strongly oppose the measure to limit or avoid afforestation on improved peat sites.	Measure has been validated. Matter for DAFF.	Section 7/ Section 9/ Section 10/ Appendices

Issue	Organisation Name	Submission Code ERBD_RBMP	Comment Code ERBD_RBMP	Description	Where Addressed	Section number in the plan
Measure	Irish Farmers Association	057	057_c013	IFA recommends that the forest service, Code of Best Forest Practice and the Forest and Water Quality, Forest Harvesting and the Environment and Forestry and AERIAL Fertilisation Guidelines are sufficient to satisfy WFD. Further research is required prior to introduction of forestry supplementary measures.	Supplementary measures are judged necessary at specific sites; ERBD approach is to use pilots to ascertain need for future measures.	Section 7/ Section 9/ Section 10/ Appendices
Measure	SWAN	059	059_c013	Forestry is only briefly and poorly addressed as a factor influencing water quality in the Draft Plan. This is misleading.	Pressures are addressed in the SWIMI report. Percentage pressure has been estimated for each water body.	Section 7/ Section 9/ Section 10/ Appendices
Policy	SWAN	059	059_c014	The Draft Plan fails to address the need to challenge the existing Forestry Act requirements for replanting following felling, irrespective of the suitability of the site.	A comment will be added to the plan suggesting that the Department review Forestry Act.	Section 7/ Section 8/ Section 10/ Appendices
Regulation	SWAN	059	059_c015	Coillte's activities, including drainage schemes, clear-fells and continued conifer plantings are not addressed and SWAN believes that there is widespread flouting of good practice guidelines and this is not address in the Plan.	Enforcement role.	Section 7
Policy	SWAN	059	059_c016	Remove obligation under 1947 Forestry Act to replant all felled areas.	A comment will be added to the plan suggesting that the Department review Forestry Act.	Section 7/ Section 8/ Section 10/ Appendices
Regulation	SWAN	059	059_c017	Enforcement of Code of Good Practice as mandatory.	Enforcement role.	Section 7

Submissions by Pressure Dangerous Substances

Issue	Organisation Name	Submission Code ERBD_RBMP	Comment Code ERBD_RBMP	Description	Where Addressed	Section number in the plan
Typographical / Presentation	Meath County Council	001	001_c010	Page 42. Should not limit discussion to Groundwater as pesticides have been detected in surface waters on repeated occasions, with implications for surface waters abstractions.	Map will be reviewed.	Mapping
Measure	Animal & Plant Health Association Ltd.	022	022_c001	Concerned that Plant Protection Products are being "lumped in" with Dangerous Chemicals and Priority Substances, only a small no. of them are named within Priority Substances.	Plant Protection Products have been correctly categorised.	Section 7/ Section 9/ Section 10/ Appendices
Regulation	Animal & Plant Health Association Ltd.	022	022_c002	Questions how agriculture can affect water- makes a point that farmers would not consider themselves to be using dangerous substances as vast majority are regulated under Reach, Pesticides Control Service or Irish Medicine Board.	Comment made on the Water Matters Report.	Section 7
Regulation	Animal & Plant Health Association Ltd.	022	022_c003	Mentions document refers to the "National Action Plan for Nitrates" and "Good Agricultural Practice" - In June 09 the EU agreed new legislation on Plant Protection Protects-shortly to be ratified.	Legislation not available.	Section 7
Policy	Animal & Plant Health Association Ltd.	022	022_c004	Mentions new initiative -The Directive on the Sustainable Use of Pesticides"-thinks it would be appropriate that any measures in the RBMP be discussed and agreed with the relevant competent authority- (Pesticide Control Service).	PCS should be represented on the ERBD Technical Council.	Section 7/ Section 8/ Section 10/ Appendices
Regulation	Animal & Plant Health Association Ltd.	022	022_c005	Suggests that all designated activities and specific pollutants and their associated threshold values be agreed across all member states. In particular, in cross border river basin catchment areas.	Legislation not available.	Section 7
Policy	Animal & Plant Health Association Ltd.	022	022_c006	Mentions this part only focuses on Nutrients-target stakeholder of a farmer would not appreciate that pesticides are covered in another section-should introduce proposed plan on sustainable use of pesticides here.	Do not know what plan this comment is referring to.	Section 7/ Section 8/ Section 10/ Appendices
Regulation	Animal & Plant Health Association Ltd.	022	022_c007	S9 - Pesticide Use- gives an impression that farmers and land owners overuse pesticides- financial constraints mean this is not true.	Do not know what plan this comment is referring to.	Section 7
Measure	Animal & Plant Health Association Ltd.	022	022_c008	No mention in relation to Agriculture here- critical that pesticides are mentioned in the relevant agriculture section.	Do not know what plan this comment is referring to.	Section 7/ Section 9/ Section 10/ Appendices

Issue	Organisation Name	Submission Code ERBD_RBMP	Comment Code ERBD_RBMP	Description	Where Addressed	Section number in the plan
Regulation	Animal & Plant Health Association Ltd.	022	022_c009	Plan will be integrated into other named plans- no mention of proposed National Plan for sustainable use of Pesticides- recommend mentioning this.	National Action Plan for sustainable use of Pesticides to be mentioned in the plan.	Section 7
Measure	DAFF	029	029_c009	National Action Plan for the sustainable use of pesticides will be the measure for ensuring objectives of the WFD. No other measures will be required for pesticides.	Can be incorporated in the next cycle of the plan.	Section 7/ Section 9/ Section 10/ Appendices
Policy	DAFF	029	029_c010	Measure -prohibit use of pesticides within groundwater protection zones should be dealt with by the National Action Programme for sustainable use of pesticides.	Can be incorporated in the next cycle of the plan.	Section 7/ Section 8/ Section 10/ Appendices
Regulation	DAFF	029	029_c012	Measure - Reporting and auditing of pesticide sales and usage by sector. As an element of EU Thematic Strategy for pesticides. Regulation will make pesticide usage surveys a statutory obligation.	Can be incorporated in the next cycle of the plan.	Section 7
Regulation	DAFF	029	029_c013	Measure- Follow Principles for Good Plant Protection Practice (use of pesticides). Question presentation of measures in table A1 and B1. This measures is already covered by Irish Legislation covering EU Directive 91/414/ EEC which is 1 of the 11 basic measures.	Matter for the EPA.	Section 7
Regulation	DAFF	029	029_c014	Measures for high status and protected areas - review controls on use and disposal of pesticides including sheep -dip. Sheep dip products are not within the remit of PCS.(pesticide control service).	Matter for the EPA.	Section 7
Measure	DAFF	029	029_c015	All RBDs - National forestry supplementary measure - reduce pesticide usage. Clarification is required here. Pesticides with high usage rates may be benign / pesticides with lower usage rate but more toxic and therefore more impact.	Site specific implementation.	Section 7/ Section 9/ Section 10/ Appendices
Measure	DAFF	029	029_c016	National Forestry Supplementary Measure- maintain registers of pesticide use. End users of plant protection products for professional use already legally required to maintain records under SI No 381 of 2006.	Will be included in basic measures.	Section 7/ Section 9/ Section 10/ Appendices
Measure	DAFF	029	029_c017	National Forestry Supplementary Measure - develop biological control methods. National Action Plan to promote the sustainable use of pesticides will encourage the use of non chemical methods of plant protection etc.	NAP (pesticides) can be incorporated in the next cycle of the plan.	Section 7/ Section 9/ Section 10/ Appendices
Data	DAFF	029	029_c018	Incorrect description of the primary Irish legislation on plant protection products and omits key amendments. See page 8 of 17 in submission outlines the relevant legislation.	Plan will be amended.	Section 3/ Section 10

Issue	Organisation Name	Submission Code ERBD_RBMP	Comment Code ERBD_RBMP	Description	Where Addressed	Section number in the plan
Regulation	DAFF	029	029_c019	Important to note: legislation relating to pesticides will be updated as appropriate to give effect to the EU legislation comprising the Thematic Strategy on Pesticides.	Noted and will be included.	Section 7
Data	Central Fisheries Board	035	035_c004	Dangerous substance - phosphorus has been designated a dangerous substance. Not highlighted in the plans.	Regulations define parameters.	Section 3/ Section 10
Regulation	An Taisce	046	046_c032	Pesticides and herbicides use within SACs, SPAs & Natural Areas of conservation should be prohibited.	Matter for NPWS.	Section 7
Measure	An Taisce	046	046_c034	Regulation of the NRA through measures in the plan such as through the design and implementation of a programme of inspection and maintenance of all oil interceptor drains on existing roads etc.	Included in the EIS.	Section 7/ Section 9/ Section 10/ Appendices
Policy	SWAN	059	059_c018	The treatment of drinking water supplies with chlorine, fluoride and aluminium must be independently reviewed.	Not relevant to the plan.	Section 7/ Section 8/ Section 10/ Appendices
Public Participation	SWAN	059	059_c019	Conduct a public awareness campaign on the use and disposal of a range of household chemicals: oils, detergents, paints, solvents etc.	Will be included in the plan.	Section 1

Submissions by Pressure Abstractions

Issue	Organisation Name	Submission Code ERBD_RBMP	Comment Code ERBD_RBMP	Description	Where Addressed	Section number in the plan
Typographical / Presentation	Meath County Council	001	001_c005	Page 29 map 14. Drinking Water abstraction point for Trim is Boyne main channel, not Knightsbrook river as indicated.	Map will be reviewed.	Maps
Typographical / Presentation	Meath County Council	001	001_c006	Page 29 map 14. Abstraction point for lower Boyne at Staleen / Roughgrange is not indicated or is misplaced further downstream.	Map will be reviewed.	Maps
Typographical / Presentation	Meath County Council	001	001_c007	Page 29 map 14. Abstraction point at Kilcarne upstream Navan not visible.	Map will be reviewed.	Maps
Typographical / Presentation	Meath County Council	001	001_c008	Page 29 map 14. Abstraction point at Blackwater (Kells) at Clavinsbridge not marked.	Map will be reviewed.	Maps
Policy	River Vartry Protection Society	008	008_c001	Page 140. Include the following additions. Any abstraction from the River Vartry's vicinity should be subject to both planning permission and a full EIA. Any abstraction in the river vicinity that threatens water levels in the river should not be undertaken. Riparian owners rights must be observed regarding fishing and water abstraction.	Wicklow County Council responsibility.	Section 7/ Section 8/ Section 11/ Appendices
Implementation	Meath County Council	016	017_c006	Abstractions. Abstractions from ground water bodies and surface waters bodies do not exceed the rate of discharge. East Meath/Kells & Oldcastle.	Matter for EPA; they will review status in 2001	Section 10
Measure	Water Supply Project	020	020_c001	The Dublin water supply project where appropriate will incorporate the objectives and measures of the plan.	Matter for the Shannon RBD; proposed transfer project noted in the Plan.	Section 7/ Section 9/ Section 10/ Appendices
Policy	The Heritage Council	023	023_c003	Abstractions. The council hopes that the plans are sufficiently robust to cope with the increasing demand of drinking water and effect on aquatic ecosystems.	The plan deals with known existing abstractions.	Section 7/ Section 8/ Section 10/ Appendices
Policy	ERFB	033	033_c007	Un regulated abstractions from watercourses with impacts on fisheries needs to be addressed.	New regulations are being drafted.	Section 7/ Section 8/ Section 10/ Appendices
Regulation	ERFB	033	033_c012	Vartry River - Abstraction proposals - impact on the surface water and fish habitat. Extinction of Atlantic Salmon population.	New regulations are being drafted.	Section 7
Climate Change	ERFB	033	033_c013	Abstraction legislation and climate change could impose problems for Boyne SAC and Liffey main channel.	New regulations are being drafted.	Section 10

Issue	Organisation Name	Submission Code ERBD_RBMP	Comment Code ERBD_RBMP	Description	Where Addressed	Section number in the plan
Regulation	ERFB	033	033_c014	Proposed abstractions on ground waters or surface waters should not cause a water body to fail to meet its WFD objective.	New regulations are being drafted.	Section 7
Data	Irish Concrete Federation	036	036_c001	De-watering of a quarry is incorrectly deemed an abstraction. It should be acknowledged in the plans and in Abstraction Legislation as water transfer.	Designation - role of the EPA.	Section 3/ Section 10
Climate Change	Shay Murtagh Ltd.	038	001_c001	Rainwater harvesting makes a significant contribution to conservation of potable water.	To be considered in the plan.	Section 7
Regulation	National Roads Authority	039	039_c001	Table 6 p31 of GW Abstractions Pressure Assessment - Pollardstown Fen ' gradual drainage of and decline in ground water levels drying up of a GWDTE with this being linked to road construction. Kildare Town Bypass GW Monitoring Committee - current work carried out is not causing damage to the terrestrial ecosystem.	Submission not on the plan but on the Groundwater Abstraction Pressure Assessment (Dublin City Council Feb 2009).	Section 7
Regulation	Independent Farmer Federation	040	040_c002	End to GW abstraction in farmlands - objects to this proposal.	Abstractions are an important pressure on water bodies.	Section 7
Data	Fingal County Council	042	041_c026	Map 15 shows pressures on Fingal rivers. Given that there is a reference to over abstraction in the Bog of the Ring, should Matt stream be indicated on this map also.	To be reviewed in the plan.	Section 3/ Section 10
Regulation	An Taisce	046	046_c014	Vartry river - plan should consider implications of abstraction from the river by Wicklow County Council. Report to be published.	Matter for Wicklow County Council. The DEHLG is preparing new regulations.	Section 7
Policy	An Taisce	046	046_c015	ERBD has not acknowledged its role in delivering WFD objectives in the Shannon RBD if proposed transfer of water from that RBD goes ahead.	Matter for the ShRBD; proposed transfer project noted in the Plan.	Section 7/ Section 8/ Section 10/ Appendices
Measure	An Taisce	046	046_c035	Water conservation measures not adequately addressed.	Needs to be incentivised under water pricing policy 2010; additional water conservation approaches included.	Section 7/ Section 9/ Section 10/ Appendices
Measure	An Taisce	046	046_c038	Water saving strategies have not been addressed in the Draft Plan. Water conservation strategy only briefly mentioned in the plan.	Needs to be incentivised under water pricing policy 2010; additional water conservation approaches included.	Section 7/ Section 9/ Section 10/ Appendices
Measure	An Taisce	046	046_c043	Complimentary measure - to water conservation programme measure - environmental awareness programme.	Covered in the project and plan.	Section 7/ Section 9/ Section 10/ Appendices

Issue	Organisation Name	Submission Code ERBD_RBMP	Comment Code ERBD_RBMP	Description	Where Addressed	Section number in the plan
Public Participation	Chambers toxicology Consulting	048	048_c005	Q8. P60 Wide consultation is good. Prevents nasty surprises. Eg In the Wicklow uplands increased abstraction of ground water for the new coastal urban areas lowers the water table, leaving existing wells run dry.	Matter for Local Authority.	Section 1
Policy	IBEC	049	049_c005	DRWSA - possible abstractions from the Shannon RBD to the ERBD not mentioned in the plan. The importance of interaction between RBDs is underscored.	Matter for ShRBD; proposed transfer project noted in the Plan.	Section 7/ Section 8/ Section 10/ Appendices
SEA	DCENR	056	056_c004	Re an abstraction licensing system for groundwater, no equivalent system yet for surface waters, these should be in parallel. Ireland may be in breach of Article11.3(e) otherwise.	DEHLG reviewing abstractions legislation.	Section 12
Economic	Irish Farmers Association	057	057_c005	Farm families who use public water supplies should have equivalency with all public water users and must not be required to subsidise the cost of supplying water to the domestic sector.	Will be addressed under water pricing policy required by 2010	Section 10
Measure	GSI	058	058_c006	In the POMs "GW should be considered as a source of public water supply in the ERBD"- This should also suggest contributing to the Greater Dublin Supply. Potential impacts of abstraction on GW, GWDTES, and surface water should be evaluated also.	Matter for Local Authorities and DEHLG.	Section 7/ Section 9/ Section 10/ Appendices
Data	GSI	058	058_c011	Geothermal Energy Exploitations are not addressed as a GW use in the draft plan. It might be useful to address this in the final plan.	To be addressed through government policy external to the Plan.	
Regulation	SWAN	059	059_c023	SWAN welcomes the proposed abstraction licensing, mandatory under the WFD.	Observation.	Section 7
Regulation	SWAN	059	059_c024	A central authority must be established, independent of the local authorities to oversee abstraction licensing, take responsibility for ensuring cumulative impacts of abstraction are not damaging to good water status, and to enforce controls on abstraction.	EPA likely regulatory authority; legislation not yet framed.	Section 7
Data	SWAN	059	059_c025	A definition of "significant" abstractions must be provided and justified. ("Significant abstractions" are those referred to in the Plans as subject to the new licensing system.)	Will be included in legislation.	Section 3/ Section 10
Data	SWAN	059	059_c026	Recharge data must be ascertained and available for each abstraction proposed.	Legislation not yet framed.	Section 3/ Section 10
Policy	SWAN	059	059_c027	The Eastern RBD Management Plan should not be finalised until the decision regarding the proposed abstraction from the Shannon to the Dublin area is made, since this has significant implications for water management in both these RBDs.	Legislative requirement to finalise the Plan. Timescales are different. Proposed transfer project noted in the Plan.	Section 7/ Section 8/ Section 10/ Appendices

Issue	Organisation Name	Submission Code ERBD_RBMP	Comment Code ERBD_RBMP	Description	Where Addressed	Section number in the plan
Climate Change	SWAN	059	059_c028	It can be conclusively demonstrated that the option chosen will have NO affect on the ecological status of the water body (including within-status deterioration) from which it is abstracting, taking into future climate change affects.	Within Shannon RBD.	Section 10
Policy	SWAN	059	059_c029	Discussions at Advisory Council meetings in the ERBD indicate that the Dublin City Council does not appear to appreciate its responsibility for WFD implementation in the Shannon RBD in the event that the abstraction goes ahead. This is not acceptable.	Will be addressed in the planning process.	Section 7/ Section 8/ Section 10/ Appendices
Data	SWAN	059	059_c082	Any further abstractions from the Avonmore/ Avonbeg system for Ashford will further worsen the Avoca problems.	Evidence required.	Section 3/ Section 10
Policy	SWAN	059	059_c084	Similarly the study of abstraction implications for the Vartry River, commissioned by Wicklow County Council has not been released. Are these reports being sat on to avoid their having to be dealt with by the RBD Plans?	Matter for the County Councils. Will be addressed in the planning process.	Section 7/ Section 8/ Section 10/ Appendices
Implementation	SWAN	059	059_c092	Encourage water harvesting and similar practical measures to reduce water use and re-use of water.	To be considered in the plan.	Section 7/ Section 10
Measure	SWAN	059	059_c093	Ban phosphates in detergents.	To be considered in the plan.	Section 7/ Section 9/ Section 10/
Measure	SWAN	059	059_c096	Reduce demands for potable water. Encourage use of harvested or recycled water for other purposes.	To be considered in the plan.	Section 7/ Section 9/ Section 10/
Measure	SWAN	059	059_c097	Actively encourage reduced water use and re-use of water where appropriate.	To be considered in the plan.	Section 7/ Section 9/ Section 10/
Measure	SWAN	059	059_c098	Address conservation of water and the prevention of waste in the water supply system.	To be considered in the plan.	Section 7/ Section 9/ Section 10
Public Participation	SWAN	059	059_c099	Establish a scheme to publicly identify water bodies meeting "good" or "high" status to increase a sense of local ownership and pride (like Tidy Towns, with some sort of "flag" or other award system).	To be considered in the plan.	Section 7
Implementation	Meath County Council	062	062_c023	Nanny experiences many problems from industrial sources, agriculture, septic tanks etc and also abstractions. Meath awaits results of detailed ground water abstraction.	Critical Dependencies.	Section 10

Submissions by Pressure Morphology

Issue	Organization Name	Submission Code	Comment Code	Description	Where Addressed	Section number in the plan
Regulation	ERBD Advisory Council	002	002_c001	Liffey Reservoir Act of 1936. Not mentioned in the plan. This Act needs to be addressed. A need to amend the Act so that no one has the right to shut off flow of the Liffey at Pollaphuca.	A reference will be made in the plan to the changing of this Act.	Section 7
Measure	ERBD Advisory Council	002	002_c003	A POM for the Liffey WMU is questioned. Measures for rivers downstream Implement a gravel loosening or gravel transportation from behind the dams to the river. Need to mention ESB.	ESB to be mentioned in the POMS.	Section 7/ Section 9/ Section 10/ Appendices
Data	ERBD Advisory Council	002	002_c004	Goldenfalls wrong designation. Plan says impoundment for drinking water. This is incorrect. This is buffer lake intended for slow release of water from Pollaphuca into the river Liffey.	Designation to be reviewed.	Section 3/ Section 11
Measure	DAFF	004	004_c003	Supplementary measures in Table B1 which should be more specifically identified include: page 155 3rd row , pg 155 8th row. Page 155 12th row.	Wording of POMS to be reviewed in the plan.	Section 7/ Section 9/ Section 10/ Appendices.
Regulation	North Kildare Trout and Salmon Anglers	009	009_c001	Liffey Reservoir Act of 1936. Not mentioned in the plan. This Act needs to be addressed. A need to amend the Act so that no one has the right to shut off flow of the Liffey at Pollaphuca.	A reference will be made in the plan to the changing of this Act.	Section 7
Measure	North Kildare Trout and Salmon Anglers	009	009_c003	A POM for the Liffey WMU is questioned. Measures for rivers downstream Implement a gravel loosening or gravel transportation from behind the dams to the river. Need to mention ESB.	ESB to be mentioned in the POMS.	Section 7/ Section 9/ Section 10/ Appendices.
Data	North Kildare Trout and Salmon Anglers	009	009_c004	Goldenfalls wrong designation. Plan says impoundment for drinking water. This is incorrect. This is buffer lake intended for slow release of water from Pollaphuca into the river Liffey.	Designation to be reviewed.	Section 3/ Section 11
Regulation	Clane & Trout Salmon Anglers	010	010_c001	Liffey Reservoir Act of 1936. Not mentioned in the plan. This Act needs to be addressed. A need to amend the Act so that no one has the right to shut off flow of the liffey at Pollaphuca.	A reference will be made in the plan to the changing of this Act.	Section 7

Issue	Organization Name	Submission Code	Comment Code	Description	Where Addressed	Section number in the plan
Measure	Clane & Trout Salmon Anglers	010	010_c003	A POM for the Liffey WMU is questioned. Measures for rivers downstream Implement a gravel loosening or gravel transportation from behind the dams to the river. Need to mention ESB.	ESB to be mentioned in the POMs.	Section 7/ Section 9/ Section 10/ Appendices.
Data	Clane & Trout Salmon Anglers	010	010_c004	Goldenfalls wrong designation. Plan says impoundment for drinking water. This is incorrect. This is a buffer lake intended for slow release of water from Pollaphuca into the river Liffey.	Designation to be reviewed.	Section 3/ Section 11
Data	Drogheda Port Company	015	015_c001	Seeking a heavily Modified Water Body designation to the river Boyne Lower tidal/ commercial estuary.	Designated as such in the plan.	Section 3/ Section 11
Data	Bremore Port Company	019	019_c001	Development of Bremore Ireland Port should be considered as it will impact on the coastal waters and tidal inlet of the Delvin River.	To be included in the plan.	Section 3/ Section 11
Data	Dublin Port Company	021	021_c001	Dublin Gateway Project to be included in the plan.	To be included in the plan.	Section 3/ Section 11
Data	Dublin Port Company	021	021_c002	6-year Maintenance Dredging Plan (2009-2015) to be included in the plan.	To be included in the plan.	Section 3/ Section 11
Data	Dublin Port Company	021	021_c003	Bulk Handling Facility - to be included in the plan.	To be included in the plan.	Section 3/ Section 11
Data	Dublin Port Company	021	021_c004	Capital Dredging (Berths and Basins) to be included in the plan.	To be included in the plan.	Section 3/ Section 11
Measure	The Heritage Council	023	023_c001	Physical Modifications. How will plan deal with modern coastal defences. Softer option such as the use of natural buffers such as mud flats, salt marshes, sand dunes and managed realignment. Plan should clarify whether hard coastal protection structures quality as 'physical modification'.	Explanation to be included in the plan.	Section 7/ Section 9/ Section 10/ Appendices.
Regulation	DAFF	029	029_c008	FW morphology, DAFF has been listed as responsible for restoration works on intensive land use. This is not the case.	Will be reviewed.	Section 7
Measure	ESB	030	030_c001	Pollaphuca and Golden Falls- recommendations regarding gravel loosening or transportation of gravel from behind the dam. Measure unclear.	Measure to be reviewed.	Section 7/ Section 9/ Section 10/ Appendices.
Exemption	ERFB	033	033_c018	Table 27. Questions validity of inclusion of Dublin Bay (HMWB).	Upstream pollution has to be addressed before GES can be obtained.	Section 11

Issue	Organization Name	Submission Code	Comment Code	Description	Where Addressed	Section number in the plan
Implementation	OPW	037	037_c002	GES and HMWBs will be challenge due to hydromorphology.	Exemptions provided for HMWBs.	Section 10/ Section 11
Data	Fingal County Council	042	041_c027	Map 16. Delvin river highly effected by drainage works. - study on the ecology . Delvin should be included on morphological pressures map.	To be reviewed in the plan.	Section 3/ Section 11
Measure	Fingal County Council	042	041_c030	Delvin Report - Restore channelized sections to natural river course and habitat.	One generic measure will be added to cover all recommendations of the Delvin Report.	Section 7/ Section 9/ Section 10/ Appendices.
Measure	Fingal County Council	042	041_c031	Delvin Report - Install natural revetment along heavily eroded sections of the river e.g Quarry site near Naul.	One generic measure will be added to cover all recommendations of the Delvin Report.	Section 7/ Section 9/ Section 10/ Appendices.
Measure	Fingal County Council	042	041_c032	Delvin Report - Review river and tributary maintenance operations.	One generic measure will be added to cover all recommendations of the Delvin Report.	Section 7/ Section 9/ Section 10/ Appendices.
Data	Dodder Angler Association	045	045_c001	HMWB designation of the Dodder not acceptable.	Correct designation has been applied.	Section 3/ Section 11
Exemption	Dodder Angler Association	045	045_c002	Proposed exemption to 2027 not exceptable ERFB submission dated 11th of November - Vartry, Liffey and Dodder main channel not wholly heavily modified. Provision made within the WFD for split designation of water bodies where HM status applies to only discreet areas.	Split designations will not be applied.	Section 11
Regulation	An Taisce	046	046_c023	pg 49 absconds some agencies of responsibilities to implement basic measures. Eg OPW responsible for 'controls of physical modifications of surface waters.	List to be reviewed.	Section 7
Data	An Taisce	046	046_c033	Objection to Boyne Estuary classified as HMWB as it is an SPA.	This SPA is an artificial environment.	Section 3/ Section 11
SEA	DCENR	056	056_c006	HMWBs and AWBs Step 8 includes Alternative objectives- HMWBs and AWBs. These should be included in the Action Plan at Step 9 in each of the proposed RBMPs.	HMWBs treated as other water bodies for measures selection in addition to specific measures. No GEP yet defined by EPA .	Section 12

Issue	Organization Name	Submission Code	Comment Code	Description	Where Addressed	Section number in the plan
SEA	DCENR	056	056_c009	Step 8 specifies that mitigation measures are required to minimise the suspension of silt during dredging at Rosslare Harbour- unnecessary as material is predominantly sand.	HMWBs treated as other water bodies for measures selection in addition to specific measures. No GEP yet defined by EPA .	Section 12
Regulation	SWAN	059	059_c020	SWAN welcomes the proposed licensing regime but cannot offer detailed comment since further details on the conditions for licensing are not provided.	Legislation not yet framed.	Section 7
Regulation	SWAN	059	059_c021	The Land Drainage Act must be revoked to remove the incentive for modifying wetlands and riparian areas through drainage.	Being addressed by the OPW under the Floods Directive.	Section 7
Implementation	SWAN	059	059_c022	Clarification on the treatment proposed for culverts is requested - Will they be retained or removed to restore streams? Rather than protection from flooding, culverting streams and rivers actually exacerbate the risks of flooding	Being addressed by the OPW under the Floods Directive.	Section 10/ Section 11
Measure	SWAN	059	059_c094	Provide simple, environmentally positive alternatives for stream flood relief measures, etc.	Matter for the OPW.	Section 7/ Section 9/ Section 10/ Appendices
Implementation	Meath County Council	062	062_c029	Tolka - serious problems with soil drainage i.e Ashbourne soil series. Significant dredging of river posed a significant threat to ecology of this water body.	Critical Dependencies.	Section 10/ Section 11

Submissions Other

Issue	Organisation Name	Submission Code ERBD_RBMP	Comment Code ERBD_RBMP	Description	Where Addressed	Section number in the plan
Typographical / Presentation	Meath County Council	001	001_c001	Page 21, Map 7. Thematic map legend looks like the 70%-80%% and 80-90% displays are swapped around. The other maps looks like this also.	Map will be reviewed.	Mapping
Typographical / Presentation	Meath County Council	001	001_c003	Page 28 Map 13. Should be chp 5, page 38, map1. Protected Areas map displays SACs as areas coloured orange. Boyne Main Channel, Blackwater (Kells), Athboy, Stoneyford, Deek are SAC but this is not obvious on the Map. Colour in channel with orange/ pink line to show Salmonid +SAC designation.	Map will be reviewed.	Mapping
Typographical / Presentation	Meath County Council	001	001_c004	Page 29 map 14. Should be chp5 page 39 map no2. Drinking Waters protected areas for rivers are coloured purple. Map incorrect.	Map will be reviewed.	Mapping
Typographical / Presentation	Meath County Council	001	001_c009	Page 34 map 16. Objectives for Lakes not coloured in. Blue / Red.	Map will be reviewed.	Mapping
Exemption	Meath County Council	001	001_c011	Page 76 Map 18. Query target for Devlins Water body (part of Mattock / Devlins) at 2015. Change Devlin target to 2021?.	Comment based on first draft of the plan. Final draft issued in December proposed exemption until 2021.	Section 10
Exemption	Meath County Council	001	001_c012	Page 76 Map 18. Query target date of 2021 for Athboy, Stonyford, Skane.	Main Meath submission agrees with exemption dates of 2021.	Section 10
Exemption	Meath County Council	001	001_c013	Page 77, Map 19. Query target date for Ryewater 2027.	Main Meath submission agrees with exemption dates of 2027.	Section 10
Exemption	Meath County Council	001	001_c014	Page 77, Map 19. Query difference between upper Broadmeadow (2021) and upper Tolka (2027)?.	Comment based on first draft of the plan. Final draft issued in December exemptions in final draft for Tolka and Broadmeadow are the same 2027.	Section 10
Measure	ERBD Advisory Council	002	002_c005	New POM added. Wicklow County Council to investigate and if necessary clean up sludge in Goldenfalls.	Measures to be included for Goldenfalls.	Section 7/ Section 9/ Section 10/ Appendices
Typographical / Presentation	Dublin City Council	003	003_c001	p13:3.2. Monitoring Network: 'Data is' should be 'data are'.	Typographical / Presentation mistakes taken account of in the plan.	Text

Issue	Organisation Name	Submission Code ERBD_RBMP	Comment Code ERBD_RBMP	Description	Where Addressed	Section number in the plan
Typographical / Presentation	Dublin City Council	003	003_c002	Pg 19- She refers to the wording of the phrase "habitats in the water". Makes a point that the word "habitats" refers to a series of elements and the sentence would read be more correct if it was " the habitats which the waters sustain"	Typographical / Presentation mistakes taken account of in the plan.	Text
Typographical / Presentation	Dublin City Council	003	003_c003	Pg 27- Typo in the phrase "National Heritage Areas (NHAS). This should be "Natural heritage Areas". Amend this throughout document. SACs should be referred to as cSACs, meaning candidate SACs. Amend through document also. It should be stated that CSACs AND SPAS are also the responsibility of NPWS.	Typographical / Presentation mistakes taken account of in the plan.	Text
Typographical / Presentation	Dublin City Council	003	003_c004	Pg 35 Table 6.11 -The "purpose" given to the habitats directive is "Habitat conservation". This is incorrect. Should say "protects species" as this is in Annex II of the directive.	Typographical / Presentation mistakes taken account of in the plan.	Text
Typographical / Presentation	Dublin City Council	003	003_c005	Pg 37, 3rd line TYPO. "theses" should be "these"	Typographical / Presentation mistakes taken account of in the plan.	Text
Typographical / Presentation	Dublin City Council	003	003_c006	Pg 38 -Amend "SAC" to "cSAC". Need consistency in naming Freshwater Pearl Mussel, need full name only of FPM only. " Margaritifera" should be spelled as "Margaritifera" Also must put all Latin names of species in Italics or underline. "Annex 2" should be "Annex II"	Typographical / Presentation mistakes taken account of in the plan.	Text
Typographical / Presentation	Dublin City Council	003	003_c007	Pg 69- The paragraph about "widespread impacts of climate change" should contain reference to pollution in watercourses from CSOs and increased rainfall conditions as well as greater prevalence of invasive species in water courses	Typographical / Presentation mistakes taken account of in the plan.	Text
Typographical / Presentation	Dublin City Council	003	003_c008	Pg 82- The National Biodiversity Plan should be included in the list of plans	Typographical / Presentation mistakes taken account of in the plan.	Text
Typographical / Presentation	Dublin City Council	003	003_c009	Pg 89 – There is no 2nd National Biodiversity Plan yet. Therefore this should say it is in preparation.	Typographical / Presentation mistakes taken account of in the plan.	Text
Typographical / Presentation	Dublin City Council	003	003_c010	Pg 106 – "Freshwater Pearl Regulations" should be given the proper title "Draft European Communities Environmental Objectives (Freshwater Pearl Mussel) Regulations 2008. Same in pg 112.	Typographical / Presentation mistakes taken account of in the plan.	Text
Typographical / Presentation	Dublin City Council	003	003_c011	Pg 114 – Typo- "Caraterisation" should be "Characterisation".	Typographical / Presentation mistakes taken account of in the plan.	Text

Issue	Organisation Name	Submission Code ERBD_RBMP	Comment Code ERBD_RBMP	Description	Where Addressed	Section number in the plan
Typographical / Presentation	DAFF	004	004_c001	A number of acronyms are used that are not listed in the Table of Acronyms e.g MimAS, FPM, PCS p131, GIS P153.	Table of Acronyms to be updated.	Text
Measure	DAFF	004	004_c002	The supplementary program of Measures (TableB1) specifies a number of measures which it is not possible to identify what exactly they should be applied to. To specify the location only as a water body eg Southwestern Irish Sea- Killiney Bay is not sufficient.	Water bodies name designation classified by the EPA.	Section 7/ Section 9/ Section 10/ Appendices
Typographical / Presentation	DAFF	004	004_c004	Appendix E page 179. A number of other places refer to 'Channelisation impact remediation schemes'. All natural river channels when not in flood so rehabilitating channelised rivers does not make sense. Suggested that channelisation is replaced with 'canalisation'.	To be changed in the plan.	Text
Measure	DAFF	004	004_c005	Coastal Waters. Proposed programme of measures. Purpose of measures sometimes not obvious. E.g. monitor shipping movements and survey banks coast.	Wording of POMS to be reviewed in the plan.	Section 7/ Section 9/ Section 10/ Appendices
Measure	DAFF	004	004_c006	Alternative program of measures where parent ID name is specified as 'Dumping at Sea Act 1996-2004 the measure name should be changed to ' permit required for Dumping at Sea' and not just repeat at Sea Act 1996-2004'.	To be included in the plan.	Section 7/ Section 9/ Section 10/ Appendices
Typographical / Presentation	IFA	005	005_c001	Illegible Graph and Charts. Eg the table of supplementary measures and associated costs are difficult to read.	Associated costs with measures not included in final draft plan.	Absorbed into the plan where appropriate
Data	IFA	005	005_c004	Good Status Water Quality. The document fails to clearly explain what is meant by good status.	Role of the EPA.	Section 3
Data	River Vartry Protection Society	008	008_c002	Protected Habitat figure 5.1 of the assessment report does not show this. Figure 5.9 does not show Nuns cross bridge which is protected nor does it show Newrath bridge.	Information on SACs and protected areas received from EPA.	Section 3
Measure	North Kildare Trout and Salmon Anglers	009	009_c005	New POM added. Wicklow County Council to investigate and if necessary clean up sludge in Goldenfalls.	Measures included for Goldenfalls.	Section 7/ Section 9/ Section 10/ Appendices
Measure	Clane & Trout Salmon Anglers	010	010_c005	New POM added. Wicklow County Council to investigate and if necessary clean up sludge in Goldenfalls.	Measures included for Goldenfalls.	Section 7/ Section 9/ Section 10/ Appendices
Implementation	Una Ui Lachtnain	011	011_c001	Requesting City Council to urgently initiate an implementation programme.	No change in the plan.	Section 10

Issue	Organisation Name	Submission Code ERBD_RBMP	Comment Code ERBD_RBMP	Description	Where Addressed	Section number in the plan
Implementation	EPA	012	012_c001	POM should be identified in the plan should be measurable and have timetables, milestones, progress reports and completion dates associated with their implementation, in respect of each specific water body.	To be included in the plan.	Section 10
Measure	EPA	012	012_c004	Water bodies that have failed to meet the required status should be listed in the plan along with the quality elements assessed as being at less than good status.	To be included in the plan.	Section 7/ Section 9/ Section 10/ Appendices
Implementation	Meath County Council	016	017_c007	Coastal. Coastal Mgt plans required by 2010.	Responsibility of Meath County Council.	Section 10
Implementation	Meath County Council	016	017_c009	Morphology. Dredge mgt plans will be required if the biotic status if our larger rivers are to be maintained. It is expected that this is an area to be managed by the OPW.	Responsibility of Meath County Council.	Section 10
Implementation	Meath County Council	016	017_c011	Peat lands. Operators of peat lands will be required to reduce impact on surface waters by better peat land mgt. Support from the EPA may be sought.	Responsibility of Meath County Council.	Section 10
Implementation	Meath County Council	016	017_c013	Resources. Meath County Council has invested heavily in cleaning up rivers. Current work programmes will have to be maintained if not improved.	Responsibility of Meath County Council.	Section 10
Measure	Public	017	017_c001	Engineering solutions to combat pollution runoff from roads etc.	These measures are already included in the plan.	Section 7/ Section 9/ Section 10/ Appendices
Climate Change	The Heritage Council	023	023_c004	Climate change. The council and failte Ireland recently completed a review of the potential impact of climate change. This report may be helpful. Www.heritagecouncil.ie .	Report to be considered in the climate change section of the plan.	Section 10
Invasive Species	The Heritage Council	023	023_c005	Invasive Species. Council hopes that emphasis on the plans will allow for funding to eradicate evasive species.	Responsibility of the DEHLG, NPWS.	Section 10
Regulation	The Heritage Council	023	023_c006	Protecting high quality areas. Emphasis on the plans may encourage the contribution of resources to ensure local Authority compliance with Birds and Habitats Directive and Biodiversity Plans.	Responsibility of the DEHLG, NPWS.	Section 7
Public Participation	The Heritage Council	023	023_c007	Public Participation. Action should be taken to educate the public generally about the value of water.	Public consultations have been carried out.	Section 1
Data	The Industrial Heritage Council	024	024_c001	Mill related waterworks - The plan does not take cognisance of the potential heritage value of water mills and related features.	Objective of the plan is to improve water quality.	Section 3/ Section 10
Data	Public	025	025_c001	Classification. It is not clear what the basis for the classification is. What is good? What is poor?.	More detail to be included in the plan.	Section 3/ Section 10

Issue	Organisation Name	Submission Code ERBD_RBMP	Comment Code ERBD_RBMP	Description	Where Addressed	Section number in the plan
Public Participation	Public	025	025_c003	P17 Q1. . Ans. Info on a website of posted locally as hardcopy.	Information to be available through water maps and RBMS.	Section 1
Data	Public	025	025_c004	P25 Q2. Criteria for classifications unclear.	More detail to be included in the plan.	Section 3/ Section 10
Data	Public	025	025_c005	p26 Q3. Map 7 does not reflect coastal water quality in the area, If so why not more blue flags.	Responsibility of EPA.	Section 3/ Section 10
Data	Public	025	025_c006	P37Q4. Not clear from Map 17 whether that the Boyne Estuary and associated Dune system is both an SPA and SAC.	Map to be reviewed.	Section 3/ Section 10
Implementation	Public	025	025_c009	P60Q8. Where there is doubt as to the success of measures, pilots should be used.	Pilot approach to be used in these cases.	Section 10
Exemption	Public	025	025_c011	p94Q10. It is not clear what the consequences of the exemption are.	Reasons for exemptions explained in the plan.	Section 10
Climate Change	Public	025	025_c012	p95Q11. Changes in rainfall pattern increase in windiness both will occasionally, increase the risk of flooding.	Observation.	Section 10
Data	Public	025	025_c013	P104Q12: From a microbiological water quality point of view why not refer to possible mitigation systems.	Part of design process	Section 3/ Section 10
Regulation	Public	025	025_c014	P104q13. The biggest risk often comes from public bodies.	Observation.	Section 7
SEA	DEHLG	028	028_c001	No specific comment to RBMP.	N/ A	Section 12
Regulation	DAFF	029	029_c003	DAFF as lead Authority of the Waste Mgt Act is incorrect. Local Authorities are the lead authorities in this regard.	Will be amended.	Section 7
Regulation	DAFF	029	029_c004	Statutory Mgt requirement 3. Implementing Authorities for national legislation are the Local Authorities.	Will be amended.	Section 7
Plan structure	DAFF	029	029_c005	The Eastern RBMP should follow the same template as the other plans.	This format facilitates the level of detail required by the EPA.	See table of contents
Data	DAFF	029	029_c011	Measure -Licensing and distribution of DAFF's GIS mapping of cropping patterns to EPA and local authorities. This is not practical to carry out. Reason duplication of data.	Data inaccessible.	Section 3/ Section 10
Data	DAFF	029	029_c020	Forestry Service. No comments submitted.	-	Section 3/ Section 10
Implementation	Offaly County Council	031	030_c001	Adoption of the plan- deferred by 1 year to allow for realistic planning and implementation timeframes.	Responsibility of the DEHLG.	Section 10
Economic	Offaly County Council	031	030_c002	Resource - lack thereof to implement measures.	Responsibility of the DEHLG.	Section 10

Issue	Organisation Name	Submission Code ERBD_RBMP	Comment Code ERBD_RBMP	Description	Where Addressed	Section number in the plan
Implementation	Offaly County Council	031	030_c003	Plan- to address specific resources, financial and human required for implementation.	Responsibility for Local Authorities.	Section 10
Economic	Offaly County Council	031	030_c004	Plan - should recognise the cost for implementation to the various stakeholders.	Inclusion of economics into the plan - a matter for the DEHLG.	Section 10
Implementation	Offaly County Council	031	030_c005	An extended deadline may be required for water bodies in Offaly. ' A proposal where no further deterioration takes place and a minimum' moderate status' is achieved by 2015 with good status being achieved by 2021 is suggested.	Exemptions can only be justified on the grounds of technical infeasibility or disproportionate costs.	Section 10
Data	Offaly County Council	031	030_c007	Implications of the Draft Surface Water regulations should be expressed in the plan.	Legislation not final.	Section 3/ Section 10
Climate Change	ERFB	033	033_c002	Licensing of WwTPs and Industrial facilities - Climate change to be incorporated into licenses.	Matter for the EPA and Local Authorities	Section 10
Data	ERFB	033	033_c004	Microbiological contamination must be considered in the plan.	Matter for the EPA and Local Authorities	Section 3/ Section 10
Measure	ERFB	033	033_c006	Basic Measures are achieving limited success. This highlights the need for wide ranging supplementary measures.	Adequate supplementary measures/Key Supporting Actions have been included as priority actions.	Section 7/ Section 9/ Section 10/ Appendices
Regulation	ERFB	033	033_c009	Coastal/ estuarine areas with holiday homes with significantly elevated pollution needs to be addressed by plan.	Subject to LA resources.	Section 7
Invasive Species	ERFB	033	033_c015	Non- native invasives- best practice mgt plans should be implemented at RBD level.	Will be included.	Section 10
Data	ERFB	033	033_c016	Protected species - populations of Margaritifera are found in Aughtrim/Avonmore while records exist for Derry Water and Ow River. What measures are in place to protect them?.	NPWS & EPA stated that no management plans are required for Margaritifera in the ERBD.	Section 3/ Section 10
Implementation	ERFB	033	033_c017	Map 17 & 18 (Maps of protected areas) must be excluded from Table 27 which outlines overview of exemptions as there is no obligation to achieve compliance with any standards and objectives at the latest 15 years from 2000 i.e. 2015.	Will be reviewed.	Section 10
Exemption	ERFB	033	033_c019	Overview exemptions. Table 27. Questions validity of inclusion of Irish Sea Dublin (HA09).	Upstream pollution has to be addressed before GES can be obtained.	Section 10
Exemption	ERFB	033	033_c020	Table 27. Questions validity of inclusion of Malahide Bay (Shellfish Designated Area).	To be reviewed.	Section 10

Issue	Organisation Name	Submission Code ERBD_RBMP	Comment Code ERBD_RBMP	Description	Where Addressed	Section number in the plan
Exemption	ERFB	033	033_c021	Table 27. Questions validity of inclusion of Northwestern Irish Sea (HA08).	Upstream pollution has to be addressed before GES can be obtained.	Section 10
Exemption	ERFB	033	033_c022	Table 27. Questions validity of inclusion of Lough Ramour (NHA), WHICH DOES'NT APPEAR TO BE INCLUDED IN map 17 (SITE CODE 000008).	Is included in the map. EPA suggests further delay.	Section 10
Exemption	ERFB	033	033_c023	Table 27. Questions validity of inclusion Athboy (Tremblestown) River (SAC not included Map 17 (Site Code 002299).	To be reviewed.	Section 10
Exemption	ERFB	033	033_c024	Table 27. Questions validity of inclusion of Blackwater North WMU (partly included as a protected drinking water area).	To be reviewed.	Section 10
Exemption	ERFB	033	033_c025	Table 27. Questions validity of inclusion of Boyne Lower WMU(SAC DESIGNATED Salmonid Waters maybe included as a protected drinking water area. Not included in map 17(Site Code 002299).	To be reviewed.	Section 10
Exemption	ERFB	033	033_c026	Table 27. Questions validity of inclusion of Boyne Upper (SAC AND MAYBE INCLUDED AS A Protected Drinking Water area(not included inMap17) and designated Salmonid Waters). SAC also not included in Map 17 (Site Code 002299).	To be reviewed.	Section 10
Exemption	ERFB	033	033_c027	Table 27. Questions validity of inclusion of Broadmeadow WMU.	To be reviewed.	Section 10
Exemption	ERFB	033	033_c028	Table 27. Questions validity of inclusion of Cammock WMU.	To be reviewed.	Section 10
Exemption	ERFB	033	033_c029	Table 27. Questions validity of inclusion of Dargle WMU.	To be reviewed.	Section 10
Exemption	ERFB	033	033_c030	Table 27. Questions validity of inclusion of Dodder WMU (HMWB).	To be reviewed.	Section 10
Exemption	ERFB	033	033_c031	Table 27. Questions validity of inclusion of Lusk WMU.	To be reviewed.	Section 10
Exemption	ERFB	033	033_c032	Table 27. Questions validity of inclusion of Mattock River MWU (partly included as a Protected drinking water area).	To be reviewed.	Section 10
Exemption	ERFB	033	033_c033	Table 27. Questions validity of inclusion of Ryewater.	To be reviewed.	Section 10
Exemption	ERFB	033	033_c034	Table 27. Questions validity of inclusion of Stoneyford River (SAC) SAC not included in Map 17 (Site Code 002299).	To be reviewed.	Section 10
Exemption	ERFB	033	033_c035	Table 27. Questions validity of inclusion of Tolka River. (HMWB).	To be reviewed.	Section 10
Exemption	ERFB	033	033_c036	Table 27. Questions validity of Boyne Estuary SAC - Site Code 001957.	To be reviewed.	Section 10
Exemption	ERFB	033	033_c037	Table 27. Questions validity of inclusion Broadmeadow Estuary (HMWB).	To be reviewed.	Section 10
Exemption	ERFB	033	033_c038	Table 27. Questions validity of inclusion of Liffey Estuary Lower (HMWB).	To be reviewed.	Section 10
Exemption	ERFB	033	033_c039	Table 27. Questions validity of inclusion of Liffey Estuary Upper (HMWB).	To be reviewed.	Section 10

Issue	Organisation Name	Submission Code ERBD_RBMP	Comment Code ERBD_RBMP	Description	Where Addressed	Section number in the plan
Exemption	ERFB	033	033_c040	Table 27. Questions validity of inclusion of Rogerstown Estuary.	To be reviewed.	Section 10
Exemption	ERFB	033	033_c041	Table 27. Questions validity of inclusion of Tolka Estuary (HMWB).	To be reviewed.	Section 10
Exemption	ERFB	033	033_c042	Table 27. Questions validity of inclusion of Dublin Bay (HMWB).	To be reviewed.	Section 10
Exemption	ERFB	033	033_c043	Table 27. Questions validity of inclusion of Irish Sea Dublin (HA09).	To be reviewed.	Section 10
Exemption	ERFB	033	033_c044	Table 27. Questions validity of inclusion of Malahide Bay.	To be reviewed.	Section 10
Exemption	ERFB	033	033_c045	Table 27. Questions validity of inclusion of Northwestern Irish Sea (HA08).	To be reviewed.	Section 10
Exemption	ERFB	033	033_c046	Table 27. Questions validity of inclusion of Avoca River designated as a drinking water, while stretches of the Avoca have been included within NHA at Arklow and near Shelton.	To be reviewed.	Section 10
Exemption	ERFB	033	033_c047	Table 27. Questions validity of inclusion of Avonbeg river significant stretches of the Avonbeg have been included within NHA/ SAC near Greenan.	To be reviewed.	Section 10
Exemption	ERFB	033	033_c048	Table 27. Questions validity of Potters River designated as a drinking water, while stretched of the potters have been included within SAC close to Deputys Pass.	To be reviewed.	Section 10
Exemption	ERFB	033	033_c049	Table 27. Questions validity of Glenealo & Glendasan Rivers, stretches of both these watercourses have been included with SACs near Laragh.	To be reviewed.	Section 10
Exemption	ERFB	033	033_c050	High status waters - Table 13 fails to take into account issues in this area.	Matter for the EPA.	Section 10
Regulation	ERFB	033	033_c051	Draft European Communities Environmental Objectives (Surface Waters) Regulations 2008 would be signed in as soon as possible.	Matter for the DEHLG.	Section 7
Data	ERFB	033	033_c052	Designated Shellfish Areas - No designation in the plan; however Balbriggan/Skerries and Malahide are designated shellfish areas.	Will be addressed now that they are designated.	Section 3/ Section 10
Exemption	ERFB	033	033_c053	Boyne Estuary (moderate status) proposed as HMWB is within an SAC. ERBD has no authority to exempt this water body.	EPA to define GEP. Precautionary approach applied.	Section 10
Exemption	ERFB	033	033_c054	Malahide Bay (moderate status) is an SAC. Proposal to exempt this. ERBD has no authority to do so.	To be reviewed.	Section 10
Data	ERFB	033	033_c055	Good Ecological Potential - has yet to be defined. This is important in terms of HMWBs and how this will affect marine and fisheries interests.	Agreed. Matter for the EPA.	Section 3/ Section 10
Exemption	ERFB	033	033_c056	Derogation sought for Lower Boyne, Nanny, Delvin systems, the Dargle, Kilcoole March and Broad Lough are excessive.	Upstream pollution has to be addressed before GES can be obtained.	Section 10

Issue	Organisation Name	Submission Code ERBD_RBMP	Comment Code ERBD_RBMP	Description	Where Addressed	Section number in the plan
Climate Change	Irish Doctors Environmental Association	034	034_c002	Table 8. Flooding not mentioned here. Climate change and a rise in the number of salt marshes may ensue and with increased temperatures may encourage mosquito to carry plasmodium vivax.	To be included	Section 10
Climate Change	Central Fisheries Board	035	035_c005	Climate Change- more emphasis given to impacts and adaptation to climate change.	To be included in the plan.	Section 10
Invasive Species	Central Fisheries Board	035	035_c006	Invasive Species - need to implement extra measures to stop the importation and further spread of non-native species.	To be included in the plan.	Section 10
Data	Central Fisheries Board	035	035_c007	Status - wfdireland.ie - does not show underlying data upon which a water body is based.	Will be included in the plan.	Section 3/ Section 10
Data	Central Fisheries Board	035	035_c008	Status - large water bodies should be split in terms of status so that the whole water body does not fail. Currently this has implications for tourism.	Defined by the EPA.	Section 3/ Section 10
Data	Central Fisheries Board	035	035_c009	Fisheries - draft plan understates the importance of fisheries	Whole plan based on ecological performance.	Section 3/ Section 10
Data	Central Fisheries Board	035	035_c010	Fisheries - plan should acknowledge that there is a clear need for salmon restoration plans.	Will be reviewed	Section 3/ Section 10
Data	Central Fisheries Board	035	035_c012	Eels - A need for the plan to take into account the existence of eels.	Will be reviewed	Section 3/ Section 10
Measure	Central Fisheries Board	035	035_c013	Supplementary measures suggested. See table 1 of submission. Measures are sub divided into problems - (1) Gravel Substrate Manipulation (2) Water - flow manipulation. (3) Riparian Zone - Bank re -profiling and tree planting (4) Fishery Management/ habitat protection.	Measures not site specific.	Section 7/ Section 9/ Section 10/ Appendices
Measure	Central Fisheries Board	035	035_c014	Integrated Constructed Wetlands - no reference to these in the draft plan. Propose it as a supplementary measure.	Already included.	Section 7/ Section 9/ Section 10/ Appendices
Public Participation	Central Fisheries Board	035	035_c015	Public Awareness of the plan and WDF.	Extensive public awareness was carried out in the ERBD.	Section 1
Measure	Central Fisheries Board	035	035_c016	Biosecurity Plans for lakes should be encouraged in the ERBD.	To be included in the plan.	Section 7/ Section 9/ Section 10/ Appendices
Climate Change	Irish Concrete Federation	036	036_c002	Supports Shay Murtagh submission - pg 4 on rainwater harvesting	To be considered in the plan.	Section 10
Climate Change	Irish Concrete Federation	036	036_c003	Promotes rain water harvesting - accelerated tax allowances to be provided for commercial installations.	To be considered in the plan.	Section 10

Issue	Organisation Name	Submission Code ERBD_RBMP	Comment Code ERBD_RBMP	Description	Where Addressed	Section number in the plan
Policy	OPW	037	037_c001	Floods Directive and WFD - important to coordinate plans and programmes of both Directives.	To be included in the plan	Section 7/ Section 8/ Section 10/ Appendices
Economic	Independent Farmer Federation	040	040_c003	Recovery of cost for water services. Opposed to this aspect of the WFD. They deem the charges to be wholly excessive for the provision of water services to farms.	Pricing policy is part of the WFD legislation.	Section 10
Implementation	Faite Ireland	041	041_c001	Prioritisation of water quality improvements to waters of high recreational and amenity value. Reference made to a report drawn up by the Faite Ireland highlighting the quality status of waters of national significance.	Priority given to all transitional and coastal water bodies.	Section 10
Climate Change	Faite Ireland	041	041_c002	Consideration of the issue of climate change in the management plan. Ref made to joint report between Faite Ireland and Heritage council on climate change.	Climate change mentioned in the plan. Report to be taken into considered in the climate change section.	Section 10
Data	Fingal County Council	042	041_c001	Poor Status designation assigned to Bog of the Ring - Fingal County Council wants this upgraded. Ref made to report written on behalf of Fingal County Council in relation to Bog of the Ring by TES.	Bog of the Ring classification status to be revised in the next classification cycle. Clarification that poor status is due only to quantitative issues and not quality.	Section 3/ Section 10
Plan Structure	Fingal County Council	042	041_c002	Plan very difficult to read.	Full data sets available in RBMS and PowerPoints.	See table of contents
Plan Structure	Fingal County Council	042	041_c003	Tables are too large - should be sub divided into smaller data blocks for clearer understanding.	Full data sets available in RBMS and PowerPoints.	See table of contents
Data	Fingal County Council	042	041_c004	A detailed glossary explaining technical language references and functions of the Acronyms.	Glossary of terms to be revised and developed.	Section 3/ Section 10
Typographical / Presentation	Fingal County Council	042	041_c005	No towns in Fingal in the maps.	Town of Swords, Blanchardstown and Balbriggan to be included on all maps.	Absorbed into the plan where appropriate
Typographical / Presentation	Fingal County Council	042	041_c006	No country boundaries included.	All maps reviewed to improve readability.	Absorbed into the plan where appropriate
Typographical / Presentation	Fingal County Council	042	041_c007	Map of all natural protected areas associated with each catchment as an easy reference point for public.	Information to be found in PowerPoints.	Absorbed into the plan where appropriate

Issue	Organisation Name	Submission Code ERBD_RBMP	Comment Code ERBD_RBMP	Description	Where Addressed	Section number in the plan
Implementation	Fingal County Council	042	041_c008	There should be clear indication of the process for implementation of actionable items to progress to good status.	More detail provided in POMS document.	Section 10/
Data	Fingal County Council	042	041_c009	No data appears to be recorded with regard to location of Waste Facility Permits, certificate of registration of Waste Management facilities with EIS within the ERBD area.	Inclusion of these records not relevant.	Section 3/ Section 10
Implementation	Fingal County Council	042	041_c010	In the current economic downturn the entire plan needs to be reviewed with what is actually achievable in terms of resource allocation.	Matter for Local Authorities & DEHLG.	Section 10
Regulation	Fingal County Council	042	041_c011	The document should describe enforcement sanctions and initiatives to ensure compliance with under lying legislation e.g. polluter pays principal.	Enforcement is a matter for the regulator	Section 7
Typographical / Presentation	Fingal County Council	042	041_c012	Itemised comments (pages 3 -5). Including typos, rewording or additional information.	To be considered in the plan.	Text
Data	Fingal County Council	042	041_c013	pg 25 par 4. Bog of the Ring upgraded from poor status.	Classification and status of water bodies - role of the EPA.	Section 3/ Section 10
Policy	Fingal County Council	042	041_c014	pg 25 and 26. ref should be made to new or draft legislation whether Irish or EU being introduced that may change the classifications of watercourses. E.g. the new draft Salmon Fishing Regulations 2009.	Only existing law is used; future changes will be addressed in subsequent plans.	Section 7/ Section 8/ Section 10/ Appendices
Data	Fingal County Council	042	041_c015	Protected Areas need to be checked for completeness. Eg Lusk WMU, MISSING SKERRIES Island SPA, Balbriggan North Beach as recreational water, Shellfish areas off Skerries and Malahide.	Will be reviewed.	Section 3/ Section 10
Implementation	Fingal County Council	042	041_c016	Extended timelines (tables must be checked against map eg Ballyboghil WMU areas shown on map don't agree with info in table).	Will be reviewed.	Section 10
Data	Fingal County Council	042	041_c017	Bathing water in Fingal has deteriorated since the draft plan.	Classification status role of the EPA.	Section 3/ Section 10
Data	Fingal County Council	042	041_c018	Proposed Shellfish Waters now adopted.	Will be included in the plan.	Section 3/ Section 10
Implementation	Fingal County Council	042	041_c022	Catchment report -Deadline for implementing each action.	Responsibility of Local Authority/DEHLG high level committee.	Section 10
Regulation	Fingal County Council	042	041_c023	Catchment report -The organisation or dept responsible.	Responsibility of Local Authority/DEHLG/EPA	Section 7
Economic	Fingal County Council	042	041_c024	Catchment report - The financial and manpower resources for implementing these actions.	Responsibility of Local Authority/DEHLG	Section 10
Data	Fingal County Council	042	041_c028	Table 13. Assessment of ecology outside of the designated water bodies should be referenced. Reference should be made to the National Biological Centre in Waterford.	Plan refers to designated reportable water bodies only.	Section 3/ Section 10

Issue	Organisation Name	Submission Code ERBD_RBMP	Comment Code ERBD_RBMP	Description	Where Addressed	Section number in the plan
Exemption	Fingal County Council	042	041_c029	Exemptions listed in table 27 Malahide Bay, North Western Irish Sea, Broadmeadow Estuary, Rogerstown Estuary and Mayne Estuary- all designated sites under EU nature conservation legislation and these will not do so until 2027. This may cause controversy.	SACs do not have to be at GES; they do have to meet the standards required of their designation.	Section 10
Measure	Fingal County Council	042	041_c033	Delvin Report- Manage and Expand riverside tree cover.	One generic measure included to cover recommendations of the Delvin Catchment Report.	Section 7/ Section 9/ Section 10/ Appendices
Measure	Fingal County Council	042	041_c034	Install/ Restore Salmonid spawning grounds.	One generic measure included to cover recommendations of the Delvin Catchment Report.	Section 7/ Section 9/ Section 10/ Appendices
Measure	Fingal County Council	042	041_c035	Delvin Report -Install permanent water quality data loggers.	One generic measure included to cover recommendations of the Delvin Catchment Report.	Section 7/ Section 9/ Section 10/ Appendices
Measure	Fingal County Council	042	041_c036	Delvin Report- establish permanent water quality data loggers.	One generic measure included to cover recommendations of the Delvin Catchment Report.	Section 7/ Section 9/ Section 10/ Appendices
Measure	Fingal County Council	042	041_c037	Delvin Report - Establish wildlife corridor along the Delvin river.	One generic measure included to cover recommendations of the Delvin Catchment Report.	Section 7/ Section 9/ Section 10/ Appendices
Measure	Fingal County Council	042	041_c038	Delvin Report- Control invasive species Japanese Knotweed, Giant Hogweed and Cherry Laurel.	One generic measure included to cover recommendations of the Delvin Catchment Report.	Section 7/ Section 9/ Section 10/ Appendices
Data	Kildare County Council	043	043_c001	Map 4 - does not clearly indicate the presence of Redbog lake.	To be reviewed.	Section 3/ Section 10
Data	Kildare County Council	043	043_c002	Map 23 - . A different type of legend or numbering system should be considered. More clarity on where water bodies are located eg. Simple table showing each water body code, name, status, objective administrative area.	All maps must be consistent.	Section 3/ Section 10

Issue	Organisation Name	Submission Code ERBD_RBMP	Comment Code ERBD_RBMP	Description	Where Addressed	Section number in the plan
Data	Kildare County Council	043	043_c003	EDEN and the RBMS is mentioned in the draft text as if these are extensively used throughout Local Authorities. This is not the case. Text should reflect it.	RBMS has been used extensively to prepare the POMS; both RBMS & EDEN will be extensively used during the cycles.	Section 3/ Section 10
Data	Kildare County Council	043	043_c004	Status Classifications - do not accurately reflect status of waters. Data not up to date. Origin of failures not clear.	Role of EPA.	Section 3/ Section 10
Measure	Kildare County Council	043	043_c005	POMS must be adaptable to status classification changes in 2011.	To be considered in the plan.	Section 7/ Section 9/ Section 10/ Appendices
Data	Kildare County Council	043	043_c006	Maps 9-16. Information sourced for these maps needs to be made clear.	All map data in RBMS with associated metadata	Section 3/ Section 10
Data	Kildare County Council	043	043_c007	Maps 17 -18 a different type of numbering system considered here.	Map to be reviewed.	Section 3/ Section 10
Data	Kildare County Council	043	043_c008	Map 20- Redbog due to its size cannot be seen here.	Map to be reviewed.	Section 3/ Section 10
Measure	Kildare County Council	043	043_c009	Section 7.2 states that the supplementary measures identified reflect an absence of legislation in some areas of water protection. When leg is enacted do they become basic measures still undergo an economic assessment as supplementary measures?>	Matter for DEHLG.	Section 7/ Section 9/ Section 10/ Appendices
Data	Kildare County Council	043	043_c010	Section 7.4 table 14 listed water body and associated recommended measures. Extend table to include status/ or objective.	Table no longer exists in the final draft submission.	Section 3/ Section 10
Measure	Kildare County Council	043	043_c011	Annex A. Considerable overlap between many measures and information could be streamlined in a more beneficial way.	To be considered in the plan.	Section 7/ Section 9/ Section 10/ Appendices
Economic	Kildare County Council	043	043_c013	Current restrictions on capital spending including the recent non-inclusion of Kildare County Council s application for borrowing drawdown is likely to have a considerable impact on the delivery of this programme.	Matter for DEHLG.	Section 10
Exemption	Kildare County Council	043	043_c016	Extended deadline sought for water bodies effected by peatlands as shown by the Upper Boyne pilot as seen on pg 5 of submission.	Exemptions altered.	Section 10
Exemption	Kildare County Council	043	043_c017	Three rivers project highlighted lyreen/ clonshambo/ Ryewater river catchment to be a slow recovery due to the retention of nutrients in sediments and low gradients. Draft plan has included some but not all water bodies for an extended deadline.	To be reviewed.	Section 10

Issue	Organisation Name	Submission Code ERBD_RBMP	Comment Code ERBD_RBMP	Description	Where Addressed	Section number in the plan
Implementation	Kildare County Council	043	043_c018	Nitrates Directive and associated pilot studies not completed. Extended timeframes may be required as information become available.	Will be reviewed in the next cycle.	Section 10
Implementation	Kildare County Council	043	043_c019	Water bodies in the Ryewater, Boyne Upper and Liffey WMUs should be considered for extended timeframes under article 4.4 to achieve the required objective. As outlined in tables in pages 6 & 7.	Exemptions can only be justified on the grounds of technical infeasibility or disproportionate costs.	Section 10
Exemption	Kildare County Council	043	043_c020	Scope in the plan to adjust areas where extrapolation method is used for classification. Eg. Blackwater South WMU.	Extended deadlines implemented where insufficient data provided for classification.	Section 10
Regulation	Kildare County Council	043	043_c021	RBD office. Seeks clarity on the role. Organisational and administrative detail could be included in plan.	Matter for DEHLG	Section 7
Data	Kildare County Council	043	043_c022	Competent Authority. As local authority are competent authorities in implementing the plan. Clarity is required in the maps and tables to show where water bodies are located. Table showing each water body code, name, status objective, administrative area.	More detail on this matter to be included in the plan.	Section 3/ Section 10
Implementation	Kildare County Council	043	043_c023	Pg 6 of plan. Interim progress reports. Clear mechanism for the plan to be reviewed to take into account the outcomes of the special studies and final status classifications.	Will be reviewed in the next cycle.	Section 10
Typographical / Presentation	Waterways Ireland	044	044_c001	Grand Canal Basin - is used in the entire report and should be replaced by Grand Canal Dock.	Correction to be made in the plan.	Text
Measure	Waterways Ireland	044	044_c002	Table 15 - change measure for Grand Canal Dock from ' Elimination of Surface WATER Outfalls where possible to ' Elimination of surface water outfalls'.	To be corrected in the plan.	Section 7/ Section 9/ Section 10/ Appendices
Exemption	An Taisce	046	046_c001	Transparency and Objectives- extended deadlines of 2021 for lakes and resevoirs. 2027 for rivers & canals, Estuaries & coastal as well as ground water is insufficient. Information provided for these derogations.	Reasons for exemptions are adequately described in the plan.	Section 10
Data	An Taisce	046	046_c002	Plan needs to clearer about how 'good status' for each water body is achieved and full cost benefit applied.	Measures are outlined clearly. Funding is a matter for the DEHLG.	Section 3/ Section 10
Economic	An Taisce	046	046_c004	Detail on economic cost not accessible.	Matter for the DEHLG.; available in RBMS.	Section 10
Economic	An Taisce	046	046_c005	Cost effective analysis not carried out as per article 5 of the WFD.	Matter for the DEHLG; available in RBMS	Section 10

Issue	Organisation Name	Submission Code ERBD_RBMP	Comment Code ERBD_RBMP	Description	Where Addressed	Section number in the plan
Implementation	An Taisce	046	046_c006	Basic measures - how long before it is determined that these are insufficient to meet good status before supplementary measures are used.	To be determined during the course of the first plan cycle.	Section 10
Measure	An Taisce	046	046_c008	Draft plan does not demonstrate that supplementary measures have been assessed for possible 'knock on' effects.	Chapter on SEA to be included in the plan.	Section 7/ Section 9/ Section 10/ Appendices
Data	An Taisce	046	046_c009	Classification categories (good, poor) Parameters used to determine this need to be explained.	More detail to be provided in the plan.	Section 3/ Section 10
Data	An Taisce	046	046_c010	Vast amount of dates not given, which needs to be presented and interrogated in order to allow concerned parties to assess the quality of the Draft.	GES defined in the plan and power points for each water body.	Section 3/ Section 10
Economic	An Taisce	046	046_c011	Resources/ funding/ personnel not highlighted in the draft plan. Ireland had not had a good track record in implementing legislation. i.e special protected areas for wild birds.	Matter for the DEHLG.	Section 10
Economic	An Taisce	046	046_c013	EU funds to remediate sites should be accessed i.e. Life funding.	Matter for the DEHLG.	Section 10
Measure	An Taisce	046	046_c016	Floods Directive needs to be listed with 'other relevant Directives'. RBMP could deliver the requirements of Floods Management Plan.	To be included in the plan.	Section 7/ Section 9/ Section 10/ Appendices
Implementation	An Taisce	046	046_c017	No synchronisation between WFD objectives and measures and OPWs drainage activity, flood prevention measures or coastal control initiatives.	There are measures relating to flooding. Matter for the OPW.	Section 10
Regulation	An Taisce	046	046_c018	Competent Authorities tasked with implementation of plan are not acting in an integrated way.	Local Authorities are now acting in a more integrated way as part of the implementation process.	Section 7
Climate Change	An Taisce	046	046_c019	Climate Change - flood mgt not adequately addressed in plan.	Is being addressed by OPW and Floods Directive.	Section 10
Climate Change	An Taisce	046	046_c020	Climate Change is dealt with in a reactive and not a proactive way in terms of strategies to increase resilience of ecosystems and facilitate adaptation to climate change.	Will be addressed.	Section 10
Measure	An Taisce	046	046_c021	National Adaptation Strategy being drafted by the DoE - relevant elements need to be incorporated into the plan. A draft needs to be obtained for plan.	Legislation not available.	Section 7/ Section 9/ Section 10/ Appendices

Issue	Organisation Name	Submission Code ERBD_RBMP	Comment Code ERBD_RBMP	Description	Where Addressed	Section number in the plan
Data	An Taisce	046	046_c022	Background data in the plan inadequate. For meaningful participation public needs access to all data.	More detail to be provided in the plan.	Section 3/ Section 10
Regulation	An Taisce	046	046_c024	pg 49 control of diffuse point discharges should include DAFF.	List to be reviewed.	Section 7
Regulation	An Taisce	046	046_c025	pg 49 prevention or reduction of the impact of accidental pollution incidents should include National Parks and Wildlife Service in terms of prevention reducing damage to aquatic habitats and protected areas.	List to be reviewed.	Section 7
Regulation	An Taisce	046	046_c026	Table 7.3 needs to include DAFF in several of the listed Actions. It is DAFF that licenses a range of activities in Protected Areas which impact on water in protected areas. (Table 7.3 does not exist in the report).	List to be reviewed.	Section 7
Measure	An Taisce	046	046_c027	A low cost/ advisory service that provides good information to farmers would be an extremely useful initiative to be developed. This could be considered as an additional measure.	Adequate advisory services already available i.e. Teagasc & IFA.	Section 7/ Section 9/ Section 10/ Appendices
Climate Change	An Taisce	046	046_c036	Rainwater harvesting needs to be addressed in the plan.	Needs to be incentivised under water pricing policy 2010.	Section 10
Measure	An Taisce	046	046_c037	Supplementary measure - full cost benefit assessment of implementing a combination of water conservation methods needs to be carried out as a supplementary measure.	To be included in the plan.	Section 7/ Section 9/ Section 10/ Appendices
Economic	An Taisce	046	046_c039	Water pricing is only briefly mentioned in the plan.' water pricing policies to be in place by 2010'. More description required on how Ireland will approach this.	Strategy for water pricing not yet identified.	Section 10
Economic	An Taisce	046	046_c040	Draft plan needs to set out its approach to accommodating the anticipated growth in population within the greater Dublin Area.	Matter for Local Authorities.	Section 10
Invasive Species	An Taisce	046	046_c042	p171. Invasive species - plan not developed an adequate scheme to tackle this.	Greater development of this issue to be included in the plan.	Section 10
Implementation	Wicklow County Council	047	ERBC_RBMP_047_c001	Implementation of measures - labour intensive. Currently a resource deficit in Wickow County Council to implement measures.	Matter for the DEHLG.	Section 10
Economic	Wicklow County Council	047	ERBC_RBMP_047_c002	Plan does not take into account monetary or human resource requirements. This makes it difficult for Wicklow County Council to organise implementation of the WFD.	Matter for the DEHLG.	Section 10

Issue	Organisation Name	Submission Code ERBD_RBMP	Comment Code ERBD_RBMP	Description	Where Addressed	Section number in the plan
Exemption	Wicklow County Council	047	ERBC_RBMP_047_c003	Request extended deadlines for out as far as possible for all WMUs it is involved in due to lack of funding for WWTP plant upgrading from the DoE.	Exemptions can only be justified on the grounds of technical infeasibility of disproportionate cost.	Section 10
Data	Wicklow County Council	047	ERBC_RBMP_047_c004	Status Classification - Wicklow County Council concerned about what makes a water body pass or fail.	Greater detail on this to be included in the plan.	Section 3/ Section 10
Data	Wicklow County Council	047	ERBC_RBMP_047_c005	Will water body classification be carried out often enough for LAs to establish if POMS are effective?	Matter for EPA.; interim status assessments are planned for 2011	Section 3/ Section 10
Regulation	Wicklow County Council	047	ERBC_RBMP_047_c006	What water quality standards is Wickow being asked to adhere to?>	Published EQS values from EPA	Section 7
Implementation	Wicklow County Council	047	ERBC_RBMP_047_c007	How achievable will these standards be?	EQS standards are mandatory	Section 10
Data	Chambers toxicology Consulting	048	048_c001	Q1 pg17. It would be useful to have monitoring data available on the ERBD website. It is difficult to understand why Wicklow mountains SAC not included in risk assessment, per guidance form NPWS. This data should be available.	Monitoring data to be made available on EDEN and RBMS	Section 3/ Section 10
Data	Chambers toxicology Consulting	048	048_c002	Q2 pg25. Gw status does not seem to have been considered in detail based on the geology to consider the heavy metal levels and thus the necessary remediation required.	Matter for EPA.	Section 3/ Section 10
Climate Change	Chambers toxicology Consulting	048	048_c003	Q11.p95 Flooding may be caused by loss through increased farm drainage encouraged in the late 1980s, change or blocking of bogs by topsoil landfill in the uplands and in lower lying ground alterations of floodplains.	Observation.	Section 10
Climate Change	Chambers toxicology Consulting	048	048_c004	Q11. p95 GWDTEs would be effected by both flooding and drought conditions.	Agreed	Section 10
Economic	IBEC	049	049_c001	Reassurances are required for businesses that they are only paying the amounts required by law and that charges to the non domestic sector are not countervailing shortfalls in local authority revenue or cross subsidising the cost of water provision to the domestic sector.	Matter for Local Authorities and DEHLG.	Section 10
Economic	IBEC	049	049_c002	Cost of measures - transparent cost options are not available.	To be included.	Section 10
Economic	IBEC	049	049_c003	Final step in cost effectiveness. If a measure is considered disproportionately expensive in its achievement then in such cases derogation should be made use of until 2021 or 2027 where feasible.	To be included..	Section 10

Issue	Organisation Name	Submission Code ERBD_RBMP	Comment Code ERBD_RBMP	Description	Where Addressed	Section number in the plan
Policy	IBEC	049	049_c004	Planning - a more integrated approach to planning and implementation investment is required given the range of planning and investment.	Matter for Local Authorities.	Section 7/ Section 8/ Section 10/ Appendices
Regulation	IBEC	049	049_c006	Local Authorities are sheltered as monopoly providers in the provision of water and wastewater services are sheltered from meaningful competition.	Will be addressed by 2010 pricing policy	Section 7
Economic	IBEC	049	049_c007	River Basin Management should not be compromised by cuts in government funding	Matter for Local Authorities and DEHLG.	Section 10
Public Participation	IBEC	049	049_c008	Reassurances are required that appropriate stakeholder interaction takes place post-consultation to ensure transparency.	Stakeholder interaction is applied equally across all stakeholders.	Section 1
Regulation	EPA	050	050_c001	Competent Authorities (clarity of).	Will be included.	Section 7
Data	EPA	050	050_c002	Inc info on ecoregions/ typology & reference to surface waters in each RBD.	Information to be supplied by EPA.	Section 3/ Section 10
Data	EPA	050	050_c003	Water bodies defined as in Annex 11 of directive.	Will explain water bodies and typologies but will continue to use waters for ease of reading in a public document.	Section 3/ Section 10
Invasive Species	EPA	050	050_c004	RBD specific issues. Greater emphasis on alien species.	Information to be supplied by EPA.	Section 10
Data	EPA	050	050_c005	Monitoring programme - reference to by way of EPA website or wfdireland website.	Link to be included. Many stakeholders have complained about WFD website and this should be amended by EPA.	Section 3/ Section 10
Data	EPA	050	050_c006	Table 4.0 - once classification tools developed they will be integrated.	Will be included.	Section 3/ Section 10
Data	EPA	050	050_c007	Overview diagram indicating how the various monitoring elements combined to give good ecological and chemical status.	Information to be supplied by EPA.	Section 3/ Section 10
Data	EPA	050	050_c008	Water bodies achieving moderate, poor or bad status in interim classification to be listed in tabular form and indicate for each water body the quality elements or other factors causing the water body to be so classified, the objective for the water body and the suggested measure.	Will be included.	Section 3/ Section 10

Issue	Organisation Name	Submission Code ERBD_RBMP	Comment Code ERBD_RBMP	Description	Where Addressed	Section number in the plan
Data	EPA	050	050_c009	Estimation of various pressures on each RBD. As required by Annex v11 requires that various pressures exerted on each RBD be estimated. Some form of analysis. Incorporate a suitable graph or a link to the relevant document.	A graph from the Characterisation Report to be included.	Section 3/ Section 10
Data	EPA	050	050_c010	See detailed appendix	Will be included.	
Implementation	EPA	050	050_c011	Prevent deterioration applicable to all water bodies. Water bodies of moderate status should have dual objectives of preventing deterioration to a lesser status and of restoring that water body to Good Status	Will be included.	Section 10
Implementation	EPA	050	050_c012	More specific targets on a water body by water body basis specifying whether high or good status is to be achieved.	Text on objectives provided nationally needs to be refined by EPA.	Section 10
Data	EPA	050	050_c016	Protection of drinking water sources. Integrate a Drinking Water Safety Plan approach to the identification of potential polluting hazards, assess the risks from such hazards and develop remedial and mitigation measures for such source risks identified.	Outside of the scope of the Plan.	Section 3/ Section 10
Invasive Species	EPA	050	050_c017	Controls on other Activities. It is recommended that controls on invasive species of particular concern for the ERBD be identified.	Will consult with the NPWS.	Section 11
Data	EPA	050	050_c018	See detailed appendix.	Will be included.	
Data	EPA	050	050_c020	More specific water body information will be required to justify derogations in timescale for achieving the WFD objectives for particular water bodies with specific reference to Articles 4 (4), (5), (6) & (7) Provide scientific reasons for seeking derogations in timescale.	Already Included.	Section 3/ Section 10
Measure	EPA	050	050_c021	Supplementary Measures Coding System. A unique coding system be used for each measure to remove any possible ambiguity.	Will consider possibility.	Section 7/ Section 9/ Section 10/ Appendices
Climate Change	EPA	050	050_c022	Climate Change - provide specific measures on how plan will incorporate climate change objectives into the plan.	Will be included.	Section 10
Exemption	EPA	050	050_c023	Achieving Good Water Status - extend deadline in Table 27 in a few cases e.g. Lough Ramour - change achievement of GES to 2021.	Will be included.	Section 10
Data	EPA	050	050_c024	County Development plans should be referenced.	Will be referred to in the body of the report.	Section 3/ Section 10
Data	EPA	050	050_c025	Reference should be made in the RBMP to Pollution Reduction Programmes/ Action Programmes required for Shellfish Waters designated under shellfish Directive etc.	Will be included if now designated.	Section 3/ Section 10

Issue	Organisation Name	Submission Code ERBD_RBMP	Comment Code ERBD_RBMP	Description	Where Addressed	Section number in the plan
SEA	EPA	050	050_c026	Integration of SEA & HDA into plan. There is no evidence that the plan has taken into account the mitigation measures identified in the Environmental Report or Habitats Directive.	Will be included.	Section 12
Implementation	EPA	050	050_c027	Timing of SEA and publication clarification. It should be noted when the final draft of the plan will come into effect.	Will be included.	Section 10
Public Participation	EPA	050	050_c028	Public Participation/ consultation documents/ Key documents should be referenced for the public i.e. websites WFDIreland.ie and ERBD.IE.	Will be included. WFDIreland must be improved.	Section 1
Regulation	Meath Farmers Association	052	052_c006	IFA proposes that each RBD committee in Ireland sets clear targets for water quality in bays and areas designated under the shellfish Waters Directive to ensure that no bays falls below the criteria for water quality set out under Regulation EC No 854/ 2004.	Criteria for WQ standards for shellfish defined by law	Section 7
Regulation	Dublin Farmers Association	053	053_c006	IFA proposes that each RBD committee in Ireland sets clear targets for water quality in bays and areas designated under the shellfish Waters Directive to ensure that no bays falls below the criteria for water quality set out under Regulation EC No 854/ 2004.	Criteria for WQ standards for shellfish defined by law	Section 7
Data	Bord Na Mona	054	054_c001	Q1 Monitoring data should be available in electronic format on a website.	To be made available through RBMS.	Section 3/ Section 10
Data	Bord Na Mona	054	054_c002	Q2 Classifications believed to be a fair assessment, given the nature and volume of monitoring.	Observation.	Section 3/ Section 10
Data	Bord Na Mona	054	054_c003	Q3 Lack of population, industry in a catchment contributes to high status on waters.	Observation.	Section 3/ Section 10
Data	Bord Na Mona	054	054_c004	Q4 Yes all designated protected areas have been identified.	Observation.	Section 3/ Section 10
Measure	Bord Na Mona	054	054_c005	Q5 No, all basic measures have not been identified.	Observation.	Section 7/ Section 9/ Section 10/ Appendices
Implementation	Bord Na Mona	054	054_c006	Q6 Yes, agrees that catchment specific approach is appropriate, even though catchments may have numerous authorities.	Observation.	Section 10
Implementation	Bord Na Mona	054	054_c007	Q7 Yes, thinks that proposed measures will achieve good ecological status, if the required level of funding is available.	Funding matter for the DEHLG.	Section 10
Implementation	Bord Na Mona	054	054_c008	Q8 Yes.	Observation.	Section 10
Economic	Bord Na Mona	054	054_c009	Q9 Difficult to seek additional charges from industry as they are already paying a fair share, water metering should be rolled in everywhere.	Matter for 2010 Pricing Policy	Section 10
Exemption	Bord Na Mona	054	054_c010	Q10 Yes, exemptions suggested are realistic.	Observation.	Section 10

Issue	Organisation Name	Submission Code ERBD_RBMP	Comment Code ERBD_RBMP	Description	Where Addressed	Section number in the plan
Climate Change	Bord Na Mona	054	054_c011	Q11 Increased rainfall in some catchments and less in others.	To be addressed in the plan.	Section 10
Implementation	Bord Na Mona	054	054_c012	Q12 Yes, focused on the right solutions.	Observation.	Section 10
Implementation	Bord Na Mona	054	054_c013	Q13 Given the current economic climate the actions are thought probably too strict, priority should be given to activities with the most impact.	Pilot approach will guide actions.	Section 10
Implementation	Bord Na Mona	054	054_c014	Makes reference to areas of the plan relating to peat extraction activities in ERBD and its impact on water quality in High Quality Areas-Plan suggests protection of these areas should be prioritized.	Observation.	Section 10
Regulation	Bord Na Mona	054	054_c015	Makes reference to recommendations made in the Peatlands Report and to the IPC license for Bord Na Mona- concerned about Emission Limit Values (ELVs) on for nutrient emissions-feel that this is inappropriate.	Outside the scope of the plan.	Section 7
Data	Dublin City Council	055	055_c001	Q1. Pt 1 DCC would like to see the summary status of monitoring data available for public.	To be made available through the RBMS.	Section 3/ Section 10
Data	Dublin City Council	055	055_c002	Q1. Pt 2 Data should be provided to both the public and Local Authorities in real time into EDEN by the EPA.	To be made available through the RBMS.	Section 3/ Section 11
Data	Dublin City Council	055	055_c003	Q1. pt 3There is a need for transparent sharing of information across all stakeholders for efficient implementation of Plan, including EPA, Local Authorities, DAFF etc.	This is one of the potential benefits of the RBMS	Section 3/ Section 10
Data	Dublin City Council	055	055_c004	Q1. Pt 4 EDEN is not currently fully used. Stakeholders are not fully engaged in terms of data.	Outside scope of the plan.	Section 3/ Section 10
Measure	Dublin City Council	055	055_c005	Q5. Pt1.Yes, if taken in conjunction with DCC comments on funding arrangements.	Observation.	Section 7/ Section 9/ Section 10/ Appendices
Measure	Dublin City Council	055	055_c006	Q6. Pt 1. The POMS as set out by the RBMP must be catchment specific, eg, urban to rural. This is especially important in terms of implementation and funding.	They are water body or sub catchment specific	Section 7/ Section 9/ Section 10/ Appendices
Implementation	Dublin City Council	055	055_c007	Q6. Pt 2. There are constraints to implementation on a catchment basis due to jurisdictional boundaries.	Pilot approach will be undertaken.	Section 10
Economic	Dublin City Council	055	055_c008	Q9. pt1. DCC feels that the economics of the RBMP and the implementation of the RBMP are very important. Please refer to funding made at the start of this submission.	Pilot approach will be undertaken.	Section 10
Implementation	Dublin City Council	055	055_c009	Q10.pt 1. Don Mc Entee commented that nature takes a long time to recharge -not enough time to implement measures.	Allowance has been made for natural recovery times	Section 10

Issue	Organisation Name	Submission Code ERBD_RBMP	Comment Code ERBD_RBMP	Description	Where Addressed	Section number in the plan
Exemption	Dublin City Council	055	055_c010	Q10.pt2 Yes exemptions are realistic for DCC.	Observation.	Section 10
Implementation	Dublin City Council	055	055_c011	Q10.pt3. The 2015 status goal may be unrealistic anywhere within the ERBD. Implementation programme should be based on pilot studies and implementation of their findings.	Pilot approach will be undertaken.	Section 10
Economic	Dublin City Council	055	055_c012	Q13pt1. The actions suggested in the RBMP does solve water ecology issues but at great expense.	Pilot approach will be undertaken.	Section 10
Measure	Dublin City Council	055	055_c013	Q13pt2. That preventative measures should be prioritised in the future.	To be included in the second plan cycle.	Section 7/ Section 9/ Section 10/ Appendices
Implementation	Dublin City Council	055	055_c014	Q13.pt 3. Prioritisation if key especially in terms of funding.	Pilot approach will be undertaken.	Section 10
Implementation	Dublin City Council	055	055_c015	Q13.pt 4. That protected areas and drinking waters would perhaps be starting focus?.	To be considered in the plan.	Section 10
Implementation	Dublin City Council	055	055_c016	Q13.pt 5. That POMS should be phased and targeted.	Observation.	Section 10
Implementation	Dublin City Council	055	055_c017	Q13.pt 6. Feels that the actions must be strict on all stakeholders equally. They must be applied across all sectors- from local authorities to developers to farmers, etc.	Observation.	Section 10
Policy	Dublin City Council	055	055_c018	Q13.pt7. Sustainable development should be considered a priority in future planning.	To be included in the plan.	Section 7/ Section 8/ Section 10/ Appendices
Implementation	Dublin City Council	055	055_c019	See pg 3 of first workshop submission. Issues identified during first workshop session.	To be included in the plan.	Section 10
Measure	Dublin City Council	055	055_c020	Amendments to existing POMS. See section 4.1 of first workshop session.	To be included in the plan.	Section 7/ Section 9/ Section 10/ Appendices
Measure	Dublin City Council	055	055_c021	Amendments to additional POMS identified. See section 4.2 of first workshop session.	To be included in the plan.	Section 7/ Section 9/ Section 10/ Appendices

Issue	Organisation Name	Submission Code ERBD_RBMP	Comment Code ERBD_RBMP	Description	Where Addressed	Section number in the plan
SEA	DCENR	056	056_c001	Concerned about access for general public to the POMS online for their local water body of interest - should present a clear pathway on how to access reports? 21% of people do not own a pc.	Plans available at local authority offices; on line resources available through libraries	Section 12
SEA	DCENR	056	056_c002	"Cruising and boating"- Proposed supplementary measures-enforcing pump out controls and speed restrictions at district level-seems to only target inland waterways-suggests an equivalent measure needs to apply in coastal water bodies.	Matter for Waterway Ireland which prepared measures for artificial waters	Section 12
SEA	DCENR	056	056_c003	"Aquaculture" - should include Cork as well as Donegal and Galway as having the highest number of aquaculture licenses.	Not relevant to the ERBD	Section 12
SEA	DCENR	056	056_c005	Action Minerals Development Act - Leading Authority for the granting of Minerals or Mining Licenses with respect to state owned minerals as DCENR and not DETE as indicated in proposed POMs.	To be reviewed	Section 12
SEA	DCENR	056	056_c007	" Next Steps" table- Step 4 should include (basic) in brackets after " mandatory" to inform the public they apply to the same measure	To be reviewed	Section 12
SEA	DCENR	056	056_c008	" Channelisation" should be replaced with the word "Canalisation"	Channelisation to be replaced.	Section 12
Economic	Irish Farmers Association	057	057_c006	IFA propose that County Councils should replicate other EU countries and pay an annual internal charge for historical under investment in water infrastructure.	Outside scope of the plan; matter for 2010 Pricing Policy	Section 10
Policy	Irish Farmers Association	057	057_c007	Dept should establish leakage reduction targets for each County Council.	Matter for DEHLG.	Section 7/ Section 8/ Section 10/ Appendices
Economic	Irish Farmers Association	057	057_c008	IFA propose the re-evaluation of current water charges.	Matter for DEHLG.	Section 10
Economic	Irish Farmers Association	057	057_c009	IFA proposes 3 year price freeze of 3.50 euros per thousand gallons and the development of a water conservation fund.	Outside scope of the plan; matter for 2010 Pricing Policy	Section 10
Measure	Irish Farmers Association	057	057_c010	Reduce Flooding - establish an environmental maintenance programme. IFA propose the establishment of an environmental works programme for each river in the ERBD to increase river capacity by tree cutting and vegetation growth control.	This measure may lead to other environmental problems.	Section 7/ Section 9/ Section 10/ Appendices
Economic	Irish Farmers Association	057	057_c014	IFA propose the establishment of a national river maintenance budget to protect wildlife such as the corncrake, the regeneration of the FW pearl mussel and the livelihoods of the thousands of farm families who loose crops annually due to flooding.	Outside the scope of the plan; matter for DEHLG/NPWS	Section 10

Issue	Organisation Name	Submission Code ERBD_RBMP	Comment Code ERBD_RBMP	Description	Where Addressed	Section number in the plan
Regulation	Irish Farmers Association	057	057_c015	IFA proposes that each RBD committee in Ireland sets clear targets for water quality in bays and areas designated under the shellfish Waters Directive to ensure that no bays falls below the criteria for water quality set out under Regulation EC No 854/ 2004.	Criteria for WQ standards for shellfish defined by law	Section 7
Economic	Irish Farmers Association	057	057_c016	Financial cost of implementing the basic and supplementary measures not available in plan. IFA would welcome additional information in this area.	Additional report on economics to be submitted.	Section 10
Data	GSI	058	058_c001	Greater consideration to GW is required- is both a pathway and a receptor.	To be addressed in the plan.	Section 3/ Section 10
Data	GSI	058	058_c003	Potential impact of SUDs on GW quality requires further investigation.	Pilot approach will guide actions.	Section 3/ Section 10
Measure	GSI	058	058_c004	Road run-off should be considered, RBD - wide.	Applied in urban areas.	Section 7/ Section 9/ Section 10/ Appendices
Measure	GSI	058	058_c005	Consideration might be given to the development of response matrices for roads, similar to existing ones for landfills.	Matter for EPA and National Roads Authority	Section 7/ Section 9/ Section 10/ Appendices
Measure	GSI	058	058_c007	Six GWDTEs are identified as "at risk" within the ERBD, supports the recommended supplementary measures in the plan.	Observation Comment.	Section 7/ Section 9/ Section 10/ Appendices
Data	GSI	058	058_c008	Useful to place greater emphasis on linkages between GW and surface waters within the final document.	To be addressed in the plan.	Section 3/ Section 10
Climate Change	GSI	058	058_c009	Reference is made to potential impacts of climate change on rivers and lakes in document, quantification of climate change impacts on GW will be required also - have potential to affect GWDTEs- needs investigation.	Climate change to be addressed in more detail in the plan.	Section 10
Data	GSI	058	058_c010	Useful to add following text under GW sub-heading " However, groundwater bodies , the groundwater management unit of the WFD, typically share boundaries with larger surface water catchments as well as aquifer boundaries".	To be addressed in the plan.	Section 3/ Section 10
Invasive Species	SWAN	059	059_c030	It is unsatisfactory that this important issue is not dealt with in the Plan.	Will be addressed in the plan.	Section 10
Invasive Species	SWAN	059	059_c031	Lists of known invasive alien species must be included in Plans.	Will be addressed in the plan.	Section 10

Issue	Organisation Name	Submission Code ERBD_RBMP	Comment Code ERBD_RBMP	Description	Where Addressed	Section number in the plan
Invasive Species	SWAN	059	059_c032	RBD Management Plans must make clear which agency/ies has responsibility for tackling invasive alien species, the resources available to do this, and their ability to command compliance from others in delivering this task.	NPWS responsible body; text to be included	Section 10
Invasive Species	SWAN	059	059_c033	RBD Management Plans must make clear who is responsible for handling situations where alien species were licensed for introduction to water bodies, but which have subsequently become invasive.	No appropriate legislation	Section 10
Invasive Species	SWAN	059	059_c034	The sale of all known invasive alien species, especially priority species already known to be causing serious problems should be banned immediately with emergency legislation (rescind the plant passports for these species).	Department to introduce legislation.	Section 10
Public Participation	SWAN	059	059_c035	Measures for public participation are inadequate in the report. An analysis of current provision and future needs should be included.	Public participation will be addressed appropriately.	Section 1
Public Participation	SWAN	059	059_c036	It is unfortunate that the more was not done to encourage active involvement of the public in the drafting of the Plan or through the consultation period	An extensive public consultation campaign was carried out.	Section 1
Public Participation	SWAN	059	059_c037	A programme for actively encouraging public participation in the implementation of the first planning cycle of the Plan from 2009 to 2015 must be set out in the Plan.	Public participation will be addressed appropriately.	Section 7
Public Participation	SWAN	059	059_c038	Include as a measure to be implemented immediately, a national public awareness campaign on water.	Matter for the DEHLG & SWAN to address failed initiative.	Section 1
Public Participation	SWAN	059	059_c039	The RBD must provide access to information on the Plan (and its supporting/background documentation) to those without broadband Internet connections.	Hardcopies are available throughout each local authority.	Section 1
Policy	SWAN	059	059_c040	The Advisory Councils must be reconstituted in an open and transparent manner.	Constituted in an open and transparent manner.	Section 7/ Section 8/ Section 10/ Appendices
Policy	SWAN	059	059_c041	The Standing Orders must be open to discussion and should be amended to allow for substantially more facilitated discussion and workshops.	Adopted by members in the first meeting.	Section 7/ Section 8/ Section 10/ Appendices
Policy	SWAN	059	059_c042	The exact role of the Advisory Council; the nature of the advice it will give, the degree to which this will be taken on board and to whom the advice will be given must be made clear so that members expectations are not unrealistic.	Defined in the standing orders.	Section 7/ Section 8/ Section 10/ Appendices

Issue	Organisation Name	Submission Code ERBD_RBMP	Comment Code ERBD_RBMP	Description	Where Addressed	Section number in the plan
Economic	SWAN	059	059_c043	The WFD requires that the cost effectiveness analysis carried out for the RBD Plans includes ecological costs and benefits.	Followed national guidance on economics.	Section 10
Economic	SWAN	059	059_c044	The RBD Management Plans must provide a summary of the economic analysis that has informed the Plans. This is mandatory under Article 13 of the Directive.	Data available will be included subject to revised DEHLG instruction.	Section 10
Economic	SWAN	059	059_c045	It must contain a commitment to initiate work to develop / adapt tools to assess ecological costs and benefits associated with water in the RBD.	Only tools developed by Goodbodys consultants are appropriate.	Section 10
Economic	SWAN	059	059_c046	The Plan must specifically require transparent decision-making, with regard to DCA, lead by fully qualified personnel and in consultation with the public and must include a specific directive that alternative objectives cannot be applied based on affordability criteria alone.	Guidance not available.	Section 10
Economic	SWAN	059	059_c047	The Plan must clearly outline the legal situation regarding domestic water charges and propose water charging as the best mechanism for promoting sustainable water use. It should propose an independent review of the issue and the possible charging options, taking into account social justice issues, with full public participation, water charging	Matter for 2010 pricing policy	Section 10
Climate Change	SWAN	059	059_c048	The short section on climate change in the Plan is insufficient.	Will be included in the plan.	Section 10
Climate Change	SWAN	059	059_c049	The plan should give a more detailed treatment of climate change similar to that in the NI draft Plans, including an outline of the implications of climate change for the aquatic environment and a summary of measures for each SWMI, to address these implications.	Will be addressed appropriately.	Section 10
Policy	SWAN	059	059_c050	The monitoring programme for coastal water bodies must be implemented immediately if Ireland is to be in compliance with Article 8 of the Directive. The Plan must then be amended, mid cycle if necessary to take account of the resulting classification	Matter for the Marine Institute.	Section 7/ Section 8/ Section 10/ Appendices
Policy	SWAN	059	059_c051	The National Integrated Coastal Zone Management strategy in draft form for years, must be reviewed with public consultation and implemented	Responsibility of commissioning authority.	Section 7/ Section 8/ Section 10/ Appendices
Data	SWAN	059	059_c052	The Draft Plan gives significantly less attention to ground water than to surface water, although these water bodies are often far harder to manage and protect effectively	All water bodies addressed appropriately.	Section 3/ Section 10

Issue	Organisation Name	Submission Code ERBD_RBMP	Comment Code ERBD_RBMP	Description	Where Addressed	Section number in the plan
Policy	SWAN	059	059_c054	The negative impacts and risks posed by so-called "land reclamation", i.e. infilling of low-lying ground/ wetlands is not addressed. The Land Drainage Act must be revoked to remove the incentive for such drainage	Matter for OPW.	Section 7/ Section 8/ Section 10/ Appendices
Measure	SWAN	059	059_c055	Floodplain restoration should be proposed as a measure	Matter for OPW.	Section 7/ Section 9/ Section 10/ Appendices
Measure	SWAN	059	059_c056	The complimentary use of reed beds for wastewater 'polishing' should be proposed and their wider use researched.	Pilot implementations recommended in final plan	Section 7/ Section 9/ Section 10/ Appendices
Regulation	SWAN	059	059_c057	The Plans must make clear who monitors delivery of all EU Directives identified as "Basic Measures" in the Draft Plans, specifically as it relates to achieving WFD objectives. They must also explain how the performance of authorities responsible for these other Directives will be held accountable, and how improved performance will be secured.	Will be included in the plan.	Section 7
Public Participation	SWAN	059	059_c058	It is important for public participation and public confidence point of view that all reports of threats to water quality are dealt with by the relevant public authority in a prompt, transparent, efficient and systematic manner.	Local Authority and EPA responsibility.	Section 1
Policy	SWAN	059	059_c059	The Draft Plans do not address anticipated future population growth trends and the water quality implications of these.	Integrated with other plans and programmes.	Section 7/ Section 8/ Section 10/ Appendices
Public Participation	SWAN	059	059_c060	Engage in ongoing dialogue with SWAN regarding our submission and provide us with a further revised copy of the draft Plan indicating where our concerns have been taken on board.	All stakeholders will be dealt with equally.	Section 1
Data	SWAN	059	059_c061	The broad recommendation to read the draft plan "in conjunction with other supplementary documentation" including background documents and the "Water Matters" report is not reasonable.	Reference to other documents agreed with the EPA.	Section 3/ Section 10
Public Participation	SWAN	059	059_c062	The Plan refers to how the process has benefited from public input but yet it nowhere indicates where comments on "Water Matters" were incorporated into the Plan.	Final SWIMI fully reflects a broad range of comments.	Section 1

Issue	Organisation Name	Submission Code ERBD_RBMP	Comment Code ERBD_RBMP	Description	Where Addressed	Section number in the plan
Data	SWAN	059	059_c063	For all water bodies in the RBD classified as less than good (or otherwise failing objectives) the quality elements that: a) were measured (as listed in Annex V of the WFD); b) that were not measured and the reason why and c) were responsible for the failure, must be clearly shown in table form.	Will be included in the plan	Section 3/ Section 10
Data	SWAN	059	059_c064	The EPA or RBD must make data on all sampling sites and frequencies, available in GIS form (click on monitoring point on a map to generate monitoring data) and be open to dialogue on queries regarding the monitoring sites.	Matter for the EPA. There is no RBD.	Section 3/ Section 10
Data	SWAN	059	059_c065	Information on the locations and frequencies of sampling are not made available in the Draft Plans or on the http:// watermaps.wfdireland.ie website,	Available from the EPA.	Section 3/ Section 10
Regulation	SWAN	059	059_c066	The EPA must investigate and establish the most appropriate system of trained volunteer testing for water bodies where monitoring is not presently conducted.	Matter for the EPA.	Section 7
Data	SWAN	059	059_c067	Where no data is held. The EPA must seek to access other existing robust data sources on water bodies where they hold no data at present, and that are not included in the present monitoring programme.	Matter for the EPA.	Section 3/ Section 10
Data	SWAN	059	059_c068	The RBD Management Plans (and www.wfdireland.ie website) must provide accurate mapped data on known discharges to water, including all licensed discharges and other known pollution sources and related information.	In plan related documentation	Section 3/ Section 10
Data	SWAN	059	059_c069	Detailed legends explaining all terms, the presence or absence of all categories (or risk, measure, etc.), the meaning of classifications (“good” and “poor”, etc.) must be included in the http:// watermaps.wfdireland.ie website.	Matter for North-South Share.	Section 3/ Section 10
Data	SWAN	059	059_c070	The precise nature of the tests conducted, as part of the monitoring and the methodology for these must be made available.	Matter for the EPA.	Section 3/ Section 10
Public Participation	SWAN	059	059_c071	There is no reference to the consultation process in relation to the significant water management issues highlighted in “Water Matters”, except to direct readers to the list of comment in the Appendix.	Final SWIMI fully reflects a broad range or comments.	Section 1
Public Participation	SWAN	059	059_c072	The capabilities of the River Basin Management System referred to in this chapter sound impressive, especially as a systematic way of looking at pressures in conjunction with monitoring and other information. However the fact that the public and stakeholders do not have access to this, undermines its relevance.	Is available through the local authorities.	Section 1

Issue	Organisation Name	Submission Code ERBD_RBMP	Comment Code ERBD_RBMP	Description	Where Addressed	Section number in the plan
Data	SWAN	059	059_c073	How many of the Natura 2000 sites are in favourable conservation status.	Available from the NPWS	Section 3/ Section 10
Implementation	SWAN	059	059_c074	It is unacceptable to outline one of the objectives of the WFD as improving water “where appropriate” to achieve good status.	Will address.	Section 10
Implementation	SWAN	059	059_c075	The default objective is good status and that must be made clear.	Will address.	Section 10
Public Participation	SWAN	059	059_c076	SWAN does not agree that the system (RBMS) contributes to transparency in the decision-making process or stakeholder involvement, since stakeholders do not have open access to the tool.	Can be accessed through the Local Authorities.	Section 1
Data	SWAN	059	059_c077	The basis of information presented, especially in relation to ‘expert judgement’ is not clear.	All data sets are defined by metadata in the RBMS	Section 3/ Section 10
Exemption	SWAN	059	059_c078	This is a misleading title when the chapter is actually about exemptions.	Will consider title.	Section 11
Data	SWAN	059	059_c079	A list of water bodies for which alternative objectives are being applied must be provided with justifications according to strict WFD criteria.	Already completed.	Section 3/ Section 10
Implementation	SWAN	059	059_c080	Relative to many other Member States the ambition level here is high & unrealistic.	ERBD's proposed compliance by 2015 is 55%, however this level of ambition will be reduced to exclude waters where data is unavailable	Section 10
Data	SWAN	059	059_c086	Why is the Arklow coast to Brittas Bay unclassified?	Matter for the EPA/MI	Section 3/ Section 10
Data	SWAN	059	059_c087	On http:// watermaps.wfdireland.ie an example of the Vartry River raises questions about the data used. Under status data, against “Fish” appears “n/a”, yet the water body is noted elsewhere as a salmonid river and data related to fish life in such a river must be available from the Fishery Board at a minimum.	Matter for the North-South Share.	Section 3/ Section 10
Data	SWAN	059	059_c088	n/ a” is ambiguous – again in relation to the Vartry on http:// watermaps.wfdireland.ie	Matter for the North-South Share.	Section 3/ Section 10
Data	SWAN	059	059_c089	o “Margartifera” is not applicable in the east of the country, but o “fish” is applicable so is “n/ a” in this case “not available” o alternatively – could “n/ a” be “not accurate”?	No specific plan for FMP protection in ERBD.	Section 3/ Section 10

Issue	Organisation Name	Submission Code ERBD_RBMP	Comment Code ERBD_RBMP	Description	Where Addressed	Section number in the plan
Data	SWAN	059	059_c090	There is a poor grasp of underlying water "geography" and its significance. For example, when the teaching college at Carysfort, Dublin was sold, the developer was unaware of the long-standing practice of water management involving opening the sluice gates of the ornamental lake to flood the meadow ground below. Enduring problems for subsequent development resulted because of a failure to recognise the watercourses and need for flow management, and to accommodate these appropriately.	Matter for the OPW.	Section 3/ Section 10
Public Participation	SWAN	059	059_c095	Encourage positive actions amongst groups (e.g. hoteliers around Killarney that have positive water policies (fat removal, zero phosphate policies, etc.), in recognition that if practices are bad for Lough Leane, then they are also bad for business. Such actions can then be used in marketing materials) and the promotion of these initiatives.	A broad approach to public participation is taken by the ERBD.	Section 1
Data	SWAN	059	059_c100	Borrow from experience of other successful initiatives, such as the RIPPLE project in Northern Ireland, along the Ballinderry River.	To be considered in the plan.	Section 3/ Section 10
Data	SWAN	059	059_c101	Data from monitoring examples of pollution linked to septic tanks that were regularly emptied should be made public, to illustrate the problems and improvements in water quality (and reduced risk to water quality) in contrast with examples of un-emptied tanks.	To be considered in the plan.	Section 3/ Section 10
Public Participation	SWAN	059	059_c102	Establish a water pollution hotline for the Republic of Ireland (as in Northern Ireland), especially out of office hours.	To be considered in the plan.	Section 1
Economic	IFA-WICKLOW	061	061_c001	Suggests that every plan should have an economic appraisal, and that cost has only been vaguely considered, meaningful further discussion needs cost implications on board.	Followed national guidance.	Section 10
Data	IFA-WICKLOW	061	061_c002	Q1 Publication of local data in local areas and wider data available on or readily accessible website.	All data is available via the RBMS	Section 3/ Section 10
Data	IFA-WICKLOW	061	061_c003	Q2 Questions the status declared for upper reaches of rivers on Wicklow such as Avonbeg or Aughtrim, considering they have very low agricultural activity and pop, also the bad category given to the Avonmore North of "Meeting of the Waters".	Matter for the EPA.	Section 3/ Section 10
Economic	IFA-WICKLOW	061	061_c004	Q3 Remote Locations, low/ nil population density - no economic activity except forestry.	Observation.	Section 10
Data	IFA-WICKLOW	061	061_c005	Q4 yes, in the areas I am familiar with.	Observation.	Section 3/ Section 10
Implementation	IFA-WICKLOW	061	061_c006	Q6 Appropriate to basic analysis. Further examination of individual river sections could give a more enlightened view of water status	To be included in the plan.	Section 10

Issue	Organisation Name	Submission Code ERBD_RBMP	Comment Code ERBD_RBMP	Description	Where Addressed	Section number in the plan
Measure	IFA-WICKLOW	061	061_c007	Q7 Proposed measures could lead to improved status - did we ever have "good ecological status" in the history of developed society?	WFD requires good status	Section 7/ Section 9/ Section 10/ Appendices
Economic	IFA-WICKLOW	061	061_c008	Q8 Yes, application of measures are very often inappropriate, expensive and ultimately give poor value for money.	WFD requires a cost effective approach	Section 10
Economic	IFA-WICKLOW	061	061_c009	Q9 it must be remembered our economy and nation are dependent on diverse activity; costs of implementation of some proposals could be prohibitive, must be cognisant of cost/ benefit in respect of any measures proposed.	WFD allows for exemptions on the grounds of disproportionate costs	Section 10
Climate Change	IFA-WICKLOW	061	061_c010	Q11 Climate change may alter rainfall patterns and water levels. Temp change may alter micro flora and fauna which over time could alter macro systems. Cannot apply measure with certainty in respect of such change.	To be included in the plan.	Section 10
Economic	IFA-WICKLOW	061	061_c012	Q13 Actions suggested are devoid of any quantified cost or impact on economic activity. "Rolls Royce vs. Lade" question, where should we be?.	Followed national guidance.	Section 10
Implementation	Meath County Council	062	062_c003	Meat welcomes the proposed exemptions as outlined on pg 5 of the submission.	Critical Dependencies.	Section 10
Implementation	Meath County Council	062	062_c004	Variation order No 2. (order of priority) adds further support to Meath County Council recognizing that adequate water services are in place to protect and enhance the environment.	Critical Dependencies.	Section 10/ Section 11
Implementation	Meath County Council	062	062_c009	Upper Boyne -proposed plan seeks an exemption until 2021. Meath welcomes this.	Critical Dependencies.	Section 10
Implementation	Meath County Council	062	062_c010	Upper Boyne- requires assistance from Kildare, Westmeath and Offaly County Council to rectify pressures here.	Critical Dependencies.	Section 10
Implementation	Meath County Council	062	062_c012	Broadmeadow rises in a bog. Springs rising in the bog are high in phosphorus. Resultant baseline nutrient requires further investigation. Classification of this water body may at a later date need to be reviewed.	Critical Dependencies.	Section 10
Implementation	Meath County Council	062	062_c013	Broadmeadow- upgrading of Ashbourne, Ratoath and Kilbride will reduce the urban pressure.	Critical Dependencies.	Section 10
Implementation	Meath County Council	062	062_c014	Broadmeadow - ERBD project office to carry out a pilot here.	Critical Dependencies.	Section 10
Implementation	Meath County Council	062	062_c016	Fingal- East Meath Flood Risk Assessment, assessing problems in 19 rivers along intercounty borders.	Critical Dependencies.	Section 10
Implementation	Meath County Council	062	062_c017	Deel - exemption to 2021. Meath will need assistance of Westmeath to rectify water quality in this river.	Critical Dependencies.	Section 10

Issue	Organisation Name	Submission Code ERBD_RBMP	Comment Code ERBD_RBMP	Description	Where Addressed	Section number in the plan
Implementation	Meath County Council	062	062_c018	Delvin - Meath welcomes exemption to 2021. Meath will require aid from Fingal to rectify issues with this river.	Critical Dependencies.	Section 10
Implementation	Meath County Council	062	062_c021	Nanny - draft plan proposes exemption to 2027.	Critical Dependencies.	Section 10
Implementation	Meath County Council	062	062_c024	Ryewater - exemption to 2027.	Critical Dependencies.	Section 10
Data	Meath County Council	062	062_c026	Estuarine water bodies - Meath currently await EPA report in relation to the classification of estuarine waters.	Critical Dependencies.	Section 3
Implementation	Meath County Council	062	062_c027	Boyne & Nanny estuaries exemption to 2027 due to significant upstream pressures.	Critical Dependencies.	Section 10
Implementation	Westmeath County Council	063	063_c001	The achievement of Good Water Quality by 2015 in Westmeath is aspirational due to the current economic climate, the status of the majority of water bodies in Westmeath ranging from Moderately at Risk to High Risk.	Exemptions can only be justified on the grounds of technical infeasibility or disproportionate costs	Section 10
Implementation	Westmeath County Council	063	063_c002	This council recommends that a more realistic system to achieve the objective of 'good water quality status' may include incremental catchment improvements for example: 20-40% improvement in 2015, 60% improvement by 2020 and 100% improvement by 2025.	Upstream catchments must achieve GES as soon as possible as they impact downstream reaches. Exemptions can only be justified on the grounds of technical infeasibility or disproportionate costs	Section 10
Implementation	Westmeath County Council	063	063_c003	Measurement in catchment improvement should be accessed through priority monitoring and inspection of agreed sites. The presentation by Mr Peter Pollard of the Scottish Environmental Protection Agency Galway Conference June 2009. See Appendix 1.	Functionality of RBMS will track this is LA implement such a programme	Section 10/ See table of contents
Plan Structure	Westmeath County Council	063	063_c004	The plans should include an executive summary that members of the public can understand,	Plan structure agreed by Advisory and Technical Councils.	See table of contents
Implementation	Westmeath County Council	063	063_c005	There is a need for a measurement system to help a local authority measure their performance regarding the achievement of the RBMP objectives.	Functionality of RBMS agreed by steering committee.	Section 10
Implementation	Westmeath County Council	063	063_c006	This measurement system should be structured in a manner that allows the local authority to clearly identify the principle risks, the pressures, the actions that are to be undertaken and a mechanism to measure their performance in relation to the improvements in surface water quality status.	Functionality of RBMS can facilitate these.	Section 10

Issue	Organisation Name	Submission Code ERBD_RBMP	Comment Code ERBD_RBMP	Description	Where Addressed	Section number in the plan
Implementation	Westmeath County Council	063	063_c007	The proposed LA system should be a usable document (IT system) allowing local authorities to track and review their progress at regular intervals (annually). This system should be linked to MCEI (Minimum Criteria for Environmental Inspections)	Functionality of RBMS agreed by steering committee.	Section 10
Data	Westmeath County Council	063	063_c008	Westmeath's issue with the RBMS include: Difficulty with the extraction of reports, lack of facilities to measure the local authorities progress or performance in relation to achieving water quality objectives,	All ERBD LAs could partake in the RBMS design group.	Section 3/ Section 10
Measure	Coillte	064	064_c001	Not applicable to the ERBD RBMP	Not relevant to the ERBD.	-
Grammar/ Typographical	Fingal County Council	041	041_c039	The Plan should include a detailed Map of all natural protected areas associated with each catchment as an easy reference point for the public.	To be included in the PowerPoint presentations.	Absorbed into the plan where appropriate
Data	Fingal County Council	041	041_c040	There should be clear indication of the process for implementation of actionable items to progress to good status.	More detail to be provided in the POMS document.	Section 3/ Section 10
Data	Fingal County Council	041	041_c041	P6 Table 1. There should be a 3rd column included in this table demonstrating whether the various milestones have been met.	Third column to be included.	Section 3/ Section 10
Data	Fingal County Council	041	041_c042	P7, Reporting. The DOEHLG has indicated there should be 4 levels of reporting. Will this be confirmed in the report.	Yes.	Section 3/ Section 10
Grammar/ Typographical	Fingal County Council	041	041_c043	When referred to in the document the Eastern River Basin District should be referred to the Eastern River Basin District (full title) or should be abbreviated to the ERBD throughout. Referring to the Eastern District or the District is confusing.	Terminology changed where possible.	Absorbed into the plan where appropriate
Data	Fingal County Council	041	041_c044	A full set of results should be on display in the local authority offices and on the council Website.	Will be made available through the RBMS.	Section 3/ Section 10
Data	Fingal County Council	041	041_c045	Map 5 and Section 3.2. The text explains the 2 types of monitoring for lakes and rivers which are clearly shown on MAP5. It is not clear from the text or the map what types of monitoring is carried out for Coastal and Estuarine and Groundwater.	Map amended	Section 3/ Section 10
Data	Fingal County Council	041	041_c046	p25 Paragraph 4. Reference to Bog of the Ring abstractions. This needs to be amended in light of Fingal's proposal to upgrade the status from 'poor'.	Amended.	Section 3/ Section 10
Data	Fingal County Council	041	041_c047	P25 and 26. Reference should be made to new or draft legislation, whether Irish or EU, being introduced that may change the classifications of watercourses e.g. the new draft Salmon Fishing Regulations 2009.	New legislation referenced where possible.	Section 3/ Section 10
Invasive species	Fingal County Council	041	041_c048	P27. Table 8. This table should include invasive alien species and protecting high quality areas as outlined in Appendix C.	More detail included on invasive species.	Section 10

Issue	Organisation Name	Submission Code ERBD_RBMP	Comment Code ERBD_RBMP	Description	Where Addressed	Section number in the plan
Data	Fingal County Council	041	041_c049	P.29 -34. Map 9-34. These maps are very unclear. It is difficult to compare areas that are relatively similar in Percentage Impact . Can different colours be used rather than line thickness to show percentage impact.	Mapping amended throughout to improve readability.	Section 3/ Section 10
Data	Fingal County Council	041	041_c050	P61-69 Table 17 and 18. Tables are unclear. A clearer indication in monetary terms is required for what each asterisk represents etc.	Tables amended.	Section 3/ Section 10
Implementation	Fingal County Council	041	041_c051	The river basin management plan and the individual catchment reports do not include any overview of detailed actions that can be implemented by the local authority or other bodies involved.	More information available in POMS.	Section 10
Economic	Fingal County Council	041	041_c052	Following on from the above, without a clear overview of detailed actions it is envisaged that it be almost impossible to put a realistic estimate on the capital costs for implementing these measures.	Costing information included.	Section 10
Implementation	Fingal County Council	041	041_c053	The reports give deadlines of 2015, 2021 and 2027 for the improvement of individual stretches of river to Good Quality status. It is not clear from the reports how these deadlines are to be achieved.	More information available in POMS.	Section 10
Data	Fingal County Council	041	041_c054	On page 22 it states that' On a positive note, these charts show that 16% of our lakes already achieve either Good or High Ecological status etc. The fact that about 80% of our lakes and 60% of our rivers are in a poor or bad state is hardly positive news. It is suggested that phrase be amended.	Amended.	Section 3/ Section 10
Data	Fingal County Council	041	041_c055	Map 8 on page 24 shows to the overall status of Groundwaters. It is noted that a large areas of north Fingal is shown red, indicating a poor status. Within this red area an area is indicated as good status, which is approximately located in the area of the Bog of the Ring. On page 25 it is stated that there are indications of over extraction at the Bog of the Ring. Should this area therefore be shown as red too and what is the explanation for the poor status of the groundwater in the surrounding area.	Text amended.	Section 3/ Section 10
Data	Fingal County Council	041	041_c056	Table 13 should include a reference to an assessment of the presence of plant and animal species protected in the EU Habitats Directive and Birds Directive that occur outside designated areas etc.	Amended.	Section 3/ Section 10
Grammar/ Typographical	Fingal County Council	041	041_c057	In Table 13 on page 51 Action point Review controls on use and disposal pesticides including Sheep-dip occurs twice.	Amended.	Absorbed into the plan where appropriate.
Data	Fingal County Council	041	041_c058	Table 24 on page 88 gives an overview of Heavily modified water which is further clarified on Map 25 on page 89. The Rogerstown estuary is shown on Map 25 but not referred to in the list in Table 24. It is suggested that this estuary be included in the list.	To be reviewed	Section 3/ Section 10

Appendices:

Table A1: EPA Submission – Response detail

Table A2: Letter from the DEHLG – Response detail

Table A3: Submission from DAFF – Response detail

Report on the road shows

Adverts for briefing session (SWIMI and Plan road shows)

Report on the number of hits on the website

Table A1 EPA Submission Detail – Key Points

Comment No ERBD_RBMP_	Description	Requirement	Reference in the Plan
050_c001	Competent Authorities (clarity of).	Statutory	Chapter 1 pg 5
050_c002	Inc info on ecoregions/typology & reference to surface waters in each RBD.	Statutory Requirement	Chapter 1
050_c003	Water bodies defined as in Annex 11 of directive.	Strongly Recommended	Defined in chapter 2
050_c004	RBD specific issues. Greater emphasis on alien species.	Recommended	Listed in chapter 7
050_c005	Monitoring programme - reference to by way of EPA website or wfdireland website.	Recommended	Included in chapter 3
050_c006	Table 4.0 - once classification tools developed they will be integrated.	Recommended	Included in chapter 3
050_c007	Overview diagram indicating how the various monitoring elements combined to give good ecological and chemical status	Recommended	Included in chapter 3
050_c008	Water bodies achieving moderate, poor or bad status in interim classification to be listed in tabular form and indicate for each water body the quality elements or other factors causing the water body to be so classified, the objective for the water body and the suggested measure.	Strongly Recommended	Section 3 table 3.6 -3.10
050_c009	Estimation of various pressures on each RBD. As required by Annex v11 requires that various pressures exerted on each RBD be estimated. Some form of analysis. Incorporate a suitable graph or a link to the relevant document.	Statutory	Included in Chapter 9
050_c010	See detailed appendix	General Requirement	Comments in Appendix included
050_c011	Prevent deterioration applicable to all water bodies,. Water bodies of moderate status should have dual objectives of preventing deterioration to a lesser status and of restoring that water body to Good Status	Statutory Requirement	Included in Chapter 6 page 1

Comment No ERBD_RBMP_	Description	Requirement	Reference in the Plan
050_c012	More specific targets on a water body by water body basis specifying whether high or good status is to be achieved.	General Requirement	Targets for each water body included in POM. Additional monitoring required for many water bodies before targets can be refined
050_c013	NAP main instrument for tackling diffuse agric pollution. NAP could be detailed more in the plan.	Strongly Recommended	Measure 40 mentioned in text
050_c014	Programme for farm inspections to control agricultural waste should be set out.	Strongly Recommended	Measure 160 -conduct farm survey
050_c015	Wastewater and industrial discharge. Permits should be required to take account of environmental objectives of the plan. Emphasise new environmental quality standards as published in European Communities Environmental Objectives.	Recommended	Included in chapter 7
050_c016	Protection of drinking water sources. Integrate a Drinking Water Safety Plan approach to the identification of potential polluting hazards, assess the risks from such hazards and develop remedial and mitigation measures for such source risks identified.	Strongly Recommended	Drinking waters discussed in Chapter 7
050_c017	Controls on other Activities. It is recommended that controls on invasive species of particular concern for the ERBD be identified.	Recommended	Included in chapter 7
050_c018	See detailed appendix	General Requirement	
050_c019	Proposed Measures. A prioritised list of Urban WwTPs in the ERBD, requiring and upgrade or improved operation be listed in tabular form.	Strongly Recommended	Included in chapter 9
050_c020	More specific water body information will be required to justify derogations in timescale for achieving the WFD objectives for particular water bodies with specific reference to Articles 4 (4), (5), (6) & (7) Provide scientific reasons for seeking derogations in timescale.	Statutory Requirement	Incorporated into Section 6
050_c021	Supplementary Measures Coding System. A unique coding system should be used for each measure to remove any possible ambiguity.	Recommended	Measures have unique codes within the RBMS

Comment No ERBD_RBMP_	Description	Requirement	Reference in the Plan
050_c022	Climate Change - provide specific measures on how plan will incorporate climate change objectives into the plan	Statutory Requirement	Included in chapter 7
050_c023	Achieving Good Water Status - extend deadline in Table 27 in a few cases eg Lough Ramor - change achievement of GES to 2021	General Requirement	GES set to 2027
050_c024	County Development plans should be referenced.	Strongly Recommended	Mentioned in chapter 11
050_c025	Reference should be made in the RBMP to Pollution Reduction Programmes/Action Programmes required for Shellfish Waters designated under shellfish Directive etc	Strongly Recommended	Pollution reduction programmes discussed in Chapter 7
050_c026	Integration of SEA & HDA into plan. There is no evidence that the plan has taken into account the mitigation measures identified in the Environmental Report or Habitats Directive	Statutory Requirement	Included in chapter 12
050_c027	Timing of SEA and publication clarification. It should be noted when the final draft of the plan will come into effect.	General Requirement	Described in chapter 1
050_c028	Public Participation/consultation documents/Key documents should be referenced for the public i.e websites WFDIreland.ie and ERBD.IE	General Requirement	Already listed in introduction

Table A1 EPA Submission Detail

Page No	Description	Reference in Plan
5	Paragraph 1: Incomplete listing of objectives and omitted wetlands, WDTE's	First paragraph of page 5 has been changed.
Gen	The final Eastern RBMP should clearly state who the competent and coordinating authorities are for the RBD as required by Annex VII, (A) (10) of the WFD and provided in Article 6 of S.I. 722 of 2003. The point should be made that it is the relevant local authorities acting jointly that are the competent authorities and that the RBD has a coordinating local authority. It should be also mentioned that EPA is the competent authority for each RBD concerning reporting to the European Commission and other tasks assigned in the regulations. There needs to be a discussion of the typology, artificial and heavily modified water bodies.	Paragraph has been inserted into chapter 1. Discussed in Chapter 2.
7	In Section 1.1 include a section to reflect the purpose of the WFD as described in Article 1 of the WFD. Since the ERBD RBMS is not available online, a link could be provided to "Water Maps" system at www.wfdireland.ie where WFD objectives and measures for individual water bodies can be found.	Included in section 1.1. RBMS will be online.
9	The river water body catchments in Map 2 do not help the readers relate themselves to a particular river of concern, as the sub-basins are presented rather than the river network. It is recommended that the main ERBD river network is included in this map.	Map 2 corrected as instructed.
13	Lakes: 2nd paragraph change to: The Directive requires us to report to them on lakes that exceed 50 hectares... Replace Seas by Transitional and coastal waters. Last paragraph: The definition of the term Water Body has a particular connotation in the WFD, and refers to its geophysical setting and the defined typologies set out in Annex II. A short explanation of this term and perhaps a link to the CIS Guidance Document on the Identification of Water Bodies would be warranted. It is NOT an administrative boundary.	Corrected as instructed.
15	Table 2 caption: water bodies are not administrative boundaries Number of lakes in table does not tally with count in text on the previous page Tables 2 and 3 (page 17) have different totals for the numbers of water bodies in the ERBD. Give the correct figure in each.	Corrected
17	Paragraph 1: The risk assessment was not an assessment of waters status. Paragraph 2, Line 1: replace assessment with <i>characterisation</i> . Delete ..where it was available.. Line 3: change waters to water bodies; change risk in to risk of them Line 4: replace requirements with <i>objectives</i> <i>Monitoring definitions need to be more in line with those in the WFD</i> Surveillance Monitoring this is intended to be a permanent set of monitoring stations at which all specified ecological and chemical quality elements will be examined. The surveillance monitoring programme contains sites representative of all waters nationally and is intended to show long term changes in water quality	Corrected
17	2nd last paragraph, Line 1: <i>these data are. Data is plural. Change in all cases.</i> A link should be provided to where further information can be found on the WFD monitoring programme, either www.wfdireland.ie or www.epa.ie/whatwedo/wfd/monitoring .	Corrected
18	In Map 6 water body status should be attributed to river water bodies and not sub-basins, therefore the linear river network should be colour coded as opposed to the sub-basins. Assigning status to the water body is specified in Annex V of the WFD as the appropriate method for presenting status maps.	Corrected

Table A1 EPA Submission Detail

Page No	Description	Reference in Plan
19	<p>The classification systems will allow us to determine the ecological status of waters when applied to the biological data gathered in the course of the monitoring programmes.</p> <p>3rd Paragraph needs to be rewritten</p> <p>5th Paragraph: There may be occasions when a natural event such as a drought....” to “There may be occasions when a natural event such as a flood or a drought...”</p> <p>There is confusion with the terms classification systems and classification schemes</p> <p>Last paragraph This paragraph needs to be rewritten</p>	Corrected
20	<p>Map 7 It is difficult to identify the lakes on this map. Removal of the background colours would improve it</p>	Mapping amended to improve visibility of lakes.
21	<p>Surface water ecological status</p> <p>Paragraph 2 Line 2 First reference to heavily modified waters states these "waters are subject to a different set of standards" – change standards to objectives.</p> <p>Table 4. Not assessing aquatic invertebrates on rocky shores</p>	Corrected
22	<p>3.5 Line 1. Mention extended time and lesser objectives.</p> <p>Line 5 replace if by <i>of</i></p> <p>As a general rule maps, tables and figures do not come before the first mention in the text. Maps 6 and 7 seem to precede their mention in this section.</p> <p>Figs 3 and 4 show ecological status – change captions</p>	Corrected
25	<p>Paragraph 2 Line 3 Delete ‘trends in groundwater quality’ and replace with ‘, background concentrations and surface water quality standards.</p> <p>Drogheda (Co. Meath) Capital letter omitted.</p> <p>Hydrometric Data</p> <p>There is no hydrometric data on the inflowing rivers to Pollaphouca Reservoir. There is also a lack of information on the flow in the River Liffey at Osberstown Treatment Plant in Co. Kildare, All the hydrometric stations in the Fingal County Council area-East Meath area were closed down, leaving a major gap in the records in the area.</p>	Corrected Installation of hydrometric stations is the role of the EPA.
26	<p>Suggest a Table showing the status of all waterbodies.</p>	Included in the plan.
27	<p>Table 8: Replace Physiochemical with <i>Physico-chemical</i> and all subsequent Morphology with <i>Morphological</i></p> <p>Hydrology with <i>Hydrological</i></p> <p>Paragraph 4 Line 1: change to ... cause pressures on surface and ..</p> <p>Paragraph 5 Line 1: change river to water body. Last sentence confusing.</p>	Corrected
28	<p>Paragraph 2 Line 5: change river to water body. Sentence 2: meaning unclear. Sentence 3 waterbodies are at risk of failing to meet the objectives of the WFD not pressures at risk; the pressures cause the risk. Sentences 5 & 6 in both instances change at risk of to at risk from.</p> <p>The report states “The abstractions map (Map 15) shows the rivers found to be at risk or probably at risk of abstractions”. Should this not be “The abstractions map (Map 15) shows the rivers found to be at risk or probably at risk of OVER abstractions”</p>	Corrected
29-36	<p>Maps should show the location of the discharges, landfills etc,</p> <p>Line thickness is a poor indicator of percent impact – suggest using different colours</p> <p>Also do the percentages have any particular meaning – no explanation in the text</p> <p>DT</p>	Explanation of line thickness in relation to maps included in the text.

Table A1 EPA Submission Detail

Page No	Description	Reference in Plan
37	Section 5 the EPA should be identified as the body (designated by SI 722 of 2003) to maintain the Register of Protected Areas and a link provided to the “Water Maps” tool (or ERBD website if available there). The specific GWDTEs within the ERBD should be listed.	Included
38-39	Maps 17 and/or 18 Indicate the Shellfish growing areas at: i) Balbriggan/Skerries and ii) Malahide Should Heavily Modified and Artificial Waters be identified in relevant Map	Map amended to include additional Shellfish growing areas.
39	Map 18 Check nutrient sensitive area in Dublin Bay. Apart from the Broadmeadow Estuary the other two nutrient sensitive areas are difficult to find on map	Map was reviewed. Nutrient sensitive areas are visible.
41	Reference should be made to the WFD monitoring programme available at www.epa.ie/whatwedo/wfd/monitoring/ . This section jumps straight to status, a Table summarizing what water bodies were at risk and from which main pressures should be included as required by Annex VII (A) (2). Paragraph 5 Line 1 change to “.. key step in deciding on programme of measures..” Section 6.1 Last paragraph should the default objective be good overall status. It should be emphasised that the no deterioration objective applies to all water bodies.	Included in chapter 3. Corrected
42	6.2 Groundwater & Map 21: Needs a table summarizing what groundwater bodies were at risk and from which main pressures should be included as required by Annex VII (A) (2).	Table included as instructed.
44	Are all the lakes indicated or are they too small to see on the map?	Map reviewed and lakes made more visible on the map.
47-48	Table 10: the EU Directive on the protection of groundwater against pollution and deterioration (2006/118/EC) is in force but not yet transposed (due in 2009), however, it should be referenced here.	New legislation was mentioned as instructed in Table 10.
49	Other Basic Measures The control of abstraction and impoundment should be expanded to include ESB in the case of the three reservoirs (Pollaphouca, Golden Falls and Leixlip) and the remaining reservoir at the top of the Cammock catchment may still be in private ownership.	ESB referred to in text
51	Table 13 the EPA developed the measures – they were developed on behalf of EPA. EPA is designated as “Responsible Agency” for a number of items i) It is a function of the Public Authorities, listed in Schedule 1 of the upcoming Surface Water Regulations, which includes the EPA, to take the measures listed in Schedule 2 of said Regulations including a register of abstractions. ii) Review controls on use and disposal of pesticides. (Included twice) this is not a function of the Agency iii) Develop a code of good practice for construction activity. Eastern Fisheries have done this. The list of Agencies assigned responsibility for these measures should be reviewed. Maintaining and expanding data files are not measures for protecting water status. Should the number of water bodies including GWDTEs required to be restored to Good Status be quantified and identified. Is it adequate to map this information?	Corrected

Table A1 EPA Submission Detail

Page No	Description	Reference in Plan
53	<p>Section 7.4 paragraph 1. Change last sentence to state that HM and AWBs are listed and described in section 11.1</p> <p>Table 14: Add by whom and by when for each measure in this table.</p> <p>An additional hydrometric station is required in the Camac Catchment d/s of the existing station. The spelling of River Cammock should be standardized. Both are used: Camac on page 53 and Cammock on page 129. The name of the river registered in the Register of Hydrometric Gauging stations in Ireland is “Cammock”.</p> <p>For the River Dodder, the plan recommends “Install fish passes”. The EPA has developed a rating at Station 09010 Waldron’s Br. for Dublin City Council that caters both for floods and low flows. This station is also required for the purposes of the Floods Directive. No fish pass should be installed unless the proposers can provide a guaranteed rating to the EPA, DCC and OPW for the new configuration post-works.</p> <p>“no additional measures” are proposed for the (main channel ?) of the River Liffey (page 53). However hydrometric stations should be erected on the Kings and Liffey rivers upstream of Pollaphouca, Station 09007 Golden Falls should continue to be upgraded to an on-line data logger, on-line data loggers should be erected at Station 09008 Osberstown, Station 09006 Celbridge and on the River Liffey d/s Leixlip.</p>	<p>Sentence has been changed.</p> <p>Sentence has been changed.</p> <p>The name for the river Cammock has been standardized throughout the plan to Cammock.</p> <p>Conditions relating to fish pass included.</p> <p>Additional measures included.</p>
54	<p>Wastewater and industrial discharges. Line 1. Change EU to Ireland’s</p>	Corrected
55	<p>Regulatory controls on abstractions from rivers, lakes and groundwater are long overdue and require legislation from DEHLG. Currently the Water Supplies Act caters for abstractions from rivers and lakes in a limited fashion and updating in the provisions of this act is required.</p>	Recommendation to update this legislation has been included in the plan.
56	<p>Section 7.4 Agriculture: Refer to the Revised GAP Regulations (S.I. 101 of 2009).</p> <p>Establishing source protection zones may require payment to the farmers involved and this should be factored in.</p> <p>This paragraph refers to EPA’s sub-catchment studies, Teagasc is carrying out this work (referred in WFD circles as “mini-catchment studies”) to assess efficacy of measures in the Nitrates Action Plan. The programme is funded by DAFF and is called the Agriculture Catchments Programme (see website http://www.teagasc.ie/agcatchments/).</p>	<p>Reference made to the GAP regulations.</p> <p>Reference to mini catchment studies has been included.</p>
57	<p>Mobile Organic compounds (pesticides) in groundwater</p> <p>A large proportion of the Upper parts of the Vartry and Liffey Catchments are not used for agricultural use. If they estimated the amount of agricultural land is actual use for various purposes, one could make a reasonable estimate as to what risk is involved here.</p> <p>Paragraph 4 of this section, reference is made to a nation survey of 200 wells and springs being sampled by the EPA. There should be a follow-on reference to how many are in the ERBD area.</p> <p>Wastewater from Unsewered Properties (including septic tanks)</p> <p>2nd Paragraph, 3rd sentence: replace “which places a duty or care” with “which places a duty of care”</p> <p>3rd Paragraph, last sentence: “On-site system remediation works will generally be effective within the first cycle providing they are in place by 2012”. It is unclear what is intended by this para. It is intended that <u>all</u> septic tanks will have on-site remediation or just the new sites put in place between now and 2012 ?</p>	Corrected

Table A1 EPA Submission Detail

Page No	Description	Reference in Plan
58	Figure 8 there is no decision box which identifies the required suite of measures after cost effectiveness analysis (CEA). Ideally this should go after stakeholder consultation. The current decision tree only provides a feedback loop to water bodies after CEA. Therefore, a decision box, which identifies a suite of agreed measures after stakeholder consultation, is required.	Corrected
59	Table 16. The purpose of collecting monitoring data is to determine the quality status of the monitored waterbody. The output will be a status assessment, which will indicate the appropriate objective and consequent measures to achieve the objective. If the waterbody is at less than good status the output will indicate the element that caused it to fail. Purpose may not be the correct column heading. In any event amend Purpose from “Import and analysis of monitoring data from local authorities and EPA” to “Import and analysis of monitoring data from local authorities, EPA, ESB and OPW”. It should be clarified whether the RBMS will be available to use on the ERBD website and if not whether it is planned to be available. As mentioned above, reference should be made to the “Water Maps” tool on the www.wfdireland.ie website.	Corrected
60-69	Section 9 Proposed Measures and, in particular, Tables 17, 18 and 19 unclear. There is a need for some form of prioritisation of these measures.	Clarified in the tables.
61	The * give no indication of cost – 0,000s? 00,000s?	Representation of costings changed.
62	Table 17 lakes Measures to reduce impact from source type - abstractions listed as a source type for all lakes - not all of them have abstractions e.g. Glendalough lakes,	Lake abstractions have been reviewed. Table amended.
67	And again same as above under supplementary measures	Lake abstractions have been reviewed and similarly supplementary measures have been adjusted.
74	Have/will environmental implications of measures, both positive and negative, be taken into account in prioritising measures? Economic analysis in accordance with Annex III of WFD is a Statutory Requirement	Economic analysis has been included in the plan in chapter 10.
	Have measures been grouped in terms of combined environmental benefits and economies of scales likely to be gained from implementation? There could be merits in Packaging Measures to facilitate achieving big hits in a co-ordinated integrated manner. This could be relevant for measures in the low to medium cost. This type of approach is not reflected in RBMP and it seems as though the implementation step is missing The use of the term “alternative programme of measures” is confusing. There is one programme of measures containing the basic and supplementary measures. Are you suggesting that in times of financial shortage that the measures should be prioritised and the top priority measures implemented as far as resources allow? We have no option but to implement the basic measures.	Economic analysis has been included in the plan in chapter 10. Terminology explained.

Table A1 EPA Submission Detail

Page No	Description	Reference in Plan
	The use of ICWs for tertiary treatment and farm specific wetlands as Alternative 2 - supplementary measures, should be examined in greater detail - see MS15 2009 report and inter Departmental Agricultural Working group deliberations as well as D Daly paper. These may not be a long-term solution unless properly designed and maintained. Limited P storage period.	Some additional information included in chapter 7 re best management practices.
75-82	Tables need clearer explanatory caption as to what they are presenting	Explanation has been provided.
85-86	Not clear how cost effective ratio was arrived at. An explanation or justification for the values not obvious at the Eastern RBD website. The Dublin Region Water Supply Project should be referred to in this section as it has major potential to impact on the draft RBMP. A draft Plan for this project is available at www.watersupplyproject-dublinregion.ie and is already going through the SEA process.	Explanation for cost effective ratio provided.
86	Supplementary measure “Introduce Integrated constructed Wetlands where practical to treat polluted river discharges”. It is the EPA view that ICWs should be used for polishing effluents that have been properly treated already and not for dealing with effluents that have not been treated.	Suggested supplementary measure included.
90	Describe proposed development for Scotsman Bay and Bremore Port	Description of proposed measure included.
92	It is doubtful that ‘good’ status can be realistically achieved by 2015 for the 4 groundwater bodies that are poor due to high phosphates in the groundwater. Similarly it is optimistic that Lough Ramor will reach good status by 2021.	Dates to achieve GES status for groundwater and lake water bodies included.
93	Table 27 refers to WMU (water management unit), whereas the accompanying text refers to river sub-catchments, a consistent term is needed.	Consistent term chosen in text - Water Management Unit.
94	In Section 11.4, this section and associated Appendix A provides a comprehensive list of relevant plans and programmes. However, this requirement (Annex VII (A)(8)) really concerns more detailed plans at sub-basin or water body level. Therefore, an obvious omission is the detailed programmes of measures provided at WMU level at the ERBD website www.erbd.ie/your_area . (61) In Section 11.4, page 94 reference should be made to the Western RBD study on climate change which assessed the POMS, which is available at www.wfdireland.ie .	Reference has been made to Western RBD study on climate change.
95	Add the definite article to “from a climate change specialist at the National University of Ireland”	Definite article added to sentence.
104	Section 12- What Happens Next The impression is given that SEA is due to be undertaken and hasn’t already contributed to the Draft RBMPs- In reality this is probably reflects what has happened, however, SEA has been underway during RBMP preparation. This issue has been correctly referred very briefly in Page 7 last sentence.	This impression has been corrected. A detailed chapter on the Strategic Environmental Assessment has been included as chapter 11.
115	Table A2 Measures selected in the Alternative Programme of Measures by Sources of Pollution in the Eastern District The measures proposed are “Collect daily abstraction rates and compensation flow releases” should be “collect the abstraction rates and compensation flow releases on a continuous basis”. Some of the power stations operate on the basis of meeting national power requirements and the times of operation can vary from day to day and hour to hour. Daily values are meaningless (see page 133, 134, 135, 138 also).	The measures have been corrected.

Table A1 EPA Submission Detail

Page No	Description	Reference in Plan
121	There would be merits in having some form of coding to distinguish between different Measures under same category e.g. ABS 01, ABS 02 etc. Abstraction related measures are significant for all rivers and lakes. The issue of Abstraction only appears twice under Groundwater – is this the case, both being Bog of the Ring.	Measures have unique coding within the RBMS.
Table B1	<p>Pages 126, 127, 129, 131. There is a repeated reference to updating the abstraction legislation</p> <p>Pages 140, 141, 144 Should the reference be amended from “collect daily water level” to “collect continuous records of water level”.</p> <p>Pages 143, 146 Should the reference be amended from “record daily abstraction rates” to “record abstraction rates continuously”.</p> <p>The supplementary measures listed in Table B1 do not correlate easily to the supplementary measures listed in Appendix E. This gives the impression of a two-track approach to POMS; an ERBD approach and an approach adopted by the other RBDs. The approach adopted by the other RBDs appears to be reflected in the measures listed in the “water maps” tool. The ERBD approach looks more comprehensive and more water body specific. However, this disconnect between the ERBD and national approach is a concern.</p> <p>There is a need to resolve the contrasting list of measures given by RBD against those listed in Appendix E and used by other RBDs in the “Water Maps” Tool.</p>	<p>This reference is correct.</p> <p>This measure has been changed to ‘Record daily water level.</p> <p>This measure has been changed as instructed.</p> <p>A table has been included in Appendix E which likens ERBD measures to the national measures.</p>
176	<p>Put caption on Table</p> <p>Include additional column to show numbers relevant to ERBD</p> <p>S1 (- 1): need to suggest alternative methods of dealing with these materials</p> <p>S2 should refer to responsibilities of WSAs to comply with Regulation 43 of S.I. No. 648 of 2007 with regard to planning permissions.</p> <p>S3 and S4: state by whom and when</p> <p>Suggest mentioning ‘constructed wetlands’ as a supplementary measure for ‘polishing’ treated sewage effluent in areas where river status is high or river is sensitive.</p> <p>Water Service Authorities should review their licences to discharge to sewer and waters (Section 4 and 16 licences) in light of the authorisations granted or pending under the Waste Water Discharge (Authorisation) Regulations and the EQO Regulations.</p>	Appendix provided by North South Share Project.
178	Table X S2 delete clause in parenthesis	These are national measures and not ERBD measures. Was not changed.
179	Paragraph 1 Lines 5 & 6: Delete <i>It ... that...</i>	Corrected
180	<p>This is a plan so we should say by whom and when these supplementary actions are carried out.</p> <p>Locally focussed and future issues</p> <p>Bullet 1: this is not a supplementary measure</p> <p>Bullet 2: standards for what?</p> <p>Bullet 5: Change to ensure pump-out facilities are functioning correctly...</p>	Appendix provided by North South Share Project.

Table A1 EPA Submission Detail

Page No	Description	Reference in Plan
WWW.ERBD.ie	<p>Draft Programme of Measures</p> <p>Vartry WMU- I examined this on the website and while the presentation is novel and very user friendly and informative for this output, there may be merits in different format- In effect have 36 Slides in Power Point Presentation. I'm not sure if this can be called up from GIS System, which would be useful, as unable to access it.</p> <p>Of note is that there is no further prioritisation of the measures over and above that provided in the RBMP.</p> <p>Supplementary Measures (In descending order of cost)</p> <p>This Table is of use, if combined with %Effect Table could</p>	<p>More information will be available on the RBMS.</p>

Table A2 DEHLG Letter 20th July

Page No	Description	Reference in Plan
	I am writing in relation to the process of finalising River Basin Management Plans under the Water Framework Directive, the consultation period for the draft plans having recently concluded.	N/A
	At the outset, I wish to acknowledge the extent of work that has been carried out and facilitated by local authorities to date. This work has been instrumental in ensuring that Ireland has thus far met all of the deadlines set out in the Water Framework Directive. A significant milestone was reached at the end of last year with the publication of the Draft River Basin Management Plans which set out environmental objectives for our water-bodies and the measures which are intended to achieve these objectives. The draft plans present to the public a strategy for the protection and improvement of our water environment in the years to come; when finalised, these plans will be central to future water protection policy.	N/A
	As you will be aware the process for adoption of these plans requires that they are to be made and published by local authorities by 16 October this year. The Minister recognises the challenges that this poses for Councils and, given also the considerably changed economic circumstances at national and local level in the last 12 months, he proposes to amend the regulations to extend this deadline by one month; the new deadline for the making of plans by councils will be 16 November.	N/A
	There is much useful information in the draft plans but considerable additional work needs to be undertaken before plans are ready for final adoption. Plans will need to be clearer and more focused on the circumstances applying in the particular regions and presenting a realistic and achievable programme of measures. The level of ambition in the Plans will need to reflect what is realistically achievable having regard to the current assessed status of water-bodies and the over-riding objective of achieving “good” status in all of our waters in accordance with the Directive.	More detail included in Plan. Level of ambition is considered achievable.
	I understand that the EPA has, as part of the public consultation, provided comprehensive comments and made recommendations in relation to the draft plans. These views are fully supported by the Department. From the Department’s perspective, the final plans must include, at a minimum, the following elements before they complete the statutory process set out above and are submitted to the European Commission as a realistic approach by Ireland to securing water quality improvements up to 2015:	Refer to Table A1.
	<ul style="list-style-type: none"> for those water-bodies within each River Basin District classified as being of good or high status, the measure(s) necessary to prevent deterioration should be identified; 	Measures are identified in Programme of Measures document and RBMS.
	<ul style="list-style-type: none"> measures needed to secure compliance with the objectives of individual protected areas e.g. designated bathing waters, shellfish growing waters etc. must be identified and scheduled in the plans 	Measures are identified in Programme of Measures document and RBMS.
	<ul style="list-style-type: none"> clear identification of those water-bodies within each River Basin District which are currently of less than good status and which can be reliably restored to good status by 2015, along with the measures that will need to be implemented to achieve the environmental objectives for these waters; 	Water bodies are identified and measures set out.
	<ul style="list-style-type: none"> clear identification of those water-bodies failing to reach at least good status within each River Basin District, the reason(s) why this is the case in relation to each water-body, as well as the measure(s) it is proposed to apply in order to achieve good status by 2015; 	Water bodies, reasons for failure to reach good status and measures are identified in documents and RBMS.
	<ul style="list-style-type: none"> information on the measures that are needed to achieve the environmental objectives detailed in the plans needs to be water-body specific and presented in more detail, for example, details of the necessary upgrade or operational improvements required at particular urban wastewater treatment plants should be provided, in order of priority, in cases where urban wastewater has been identified as a contributory cause to the water quality problem; 	Measures are water body specific.
	<ul style="list-style-type: none"> clear identification of those water-bodies within each River Basin District for which permanently less stringent environmental objectives are to apply, including the reasons why this is the case; 	Water body identified and discussed.

Table A2 DEHLG Letter 20th July

Page No	Description	Reference in Plan
	<ul style="list-style-type: none"> in relation to each of the water-bodies failing to reach at least good status, the relative priority to be attached to remedying each water-body should be clearly spelt out taking full account of cost-effectiveness and protected area status; 	Prioritisation and cost effectiveness discussed in Plan chapter 10 and 12.
	<ul style="list-style-type: none"> where attainment of good status is not considered achievable by 2015, the reason for this must be provided and justified in accordance with the appropriate exemption provision under the Directive; 	Reasons provided.
	<ul style="list-style-type: none"> for those water-bodies within each River Basin District classified as being of good or higher status, the measure(s) considered necessary to prevent non-deterioration should be identified. 	Measures highlighted in documentation and RBMS.
	The Department acknowledges that local authorities may require additional resources in order to ensure that the plans, to be presented to Councils, are completed as outlined above. Significant funding has been provided to date to implement the Directive and in order that the plans may now be finalised, the Department is prepared to make available some additional funding to be used to engage the support necessary to complete the plans. Much of the necessary information in relation to the status etc. of water-bodies is already available in background documents and it is considered that the cost of finalising the plans in the manner outlined above will not be excessive. Coordinating local authorities are invited to submit cost estimates as a matter of priority.	N/A
	While much of the content of the draft plans deals with local implementation issues and can be included in the final plans with a great degree of certainty as to its deliverability, some other important aspects require a national perspective and implementation in a uniform way. These include:	N/A
	<ul style="list-style-type: none"> consideration of the cost, overall prioritisation and other resource implications when deciding measures to be incorporated in the final plans, for example, measures in relation to Urban Wastewater Treatment will be partly guided/influenced by decisions on the next Water Services Investment Programme 2010-2012 which, informed by the new local authority needs assessments to be prepared over the coming months. 	Cost discussed in Chapter 10.
	<ul style="list-style-type: none"> consistency in the application of any exemptions provided for by the Directive. 	A consistent approach has been taken as mandated through the use of the RBMS system.
	While the current approach to river basin management planning has been vital in developing the plans to date, supplementary supports are now required to ensure a coordinated approach by the relevant public authorities to those issues that require a national perspective and common implementation.	Supplementary measures are detailed in the Programme of Measures document and RBMS.
	Against this background and as indicated previously, the Department proposes to establish a high-level advisory group to support the finalisation and subsequent implementation of the River Basin Management Plans and the Programmes of Measures. It is planned that membership of the group will be made up from this Department, the CCMA, the EPA and other Government Departments as appropriate e.g. the Department of Agriculture, Fisheries and Food.	N/A
	The Department remains committed to achieving the deadlines set out in the Water Framework Directive and will liaise closely with the EU Commission in this regard. The Department will also continue to maintain close coordination with the relevant authorities in Northern Ireland with regard to the cross-border International River Basin Districts.	N/A
	It is important that local authorities maintain their efforts to ensure that the draft plans are adopted by the statutory deadlines set out above. Each local authority should ensure that their schedule of council meetings permits sufficient consideration of the River Basin Management Plans, to allow for the plans to be made and published by the elected members by the revised November 2009 deadline.	N/A

Table A3 Detailed response to DAFF Submission

Reference to Plan	Description	Page in Submission	Inclusion in Plan	Incorporation into Plan
No specific reference	DAFF are strongly opposed to the introduction of supplementary measures prior to the finding of EPA review of the European Communities (Good Agricultural Practice for protection of waters) Regulations and the findings of the DAFF Agricultural Mini-Catchment Programme.	2 of 17	×	Much included in REPS and is therefore part of good farming practices.
No specific reference	DAFF are strongly opposed to 'over grazing remediation' as a supplementary measure.	3 of 17	√	Will be reviewed.
No specific reference	DAFF as lead Authority of the Waste Mgt Act is incorrect. Local Authorities are the lead authorities in this regard.	3 of 17	√	Will be amended.
No specific reference	Statutory Mgt requirement 3. Implementing Authorities for national legislation are the Local Authorities.	3 of 17	√	Will be amended.
No specific reference	The Eastern RBMP should follow the same template as the other plans.	3 of 17	×	This format facilitates the level of detail required by the EPA.
No specific reference	DAFF are strongly opposed to supplementary measures specifically outlined in the EBMP AS Nitrates Action Plan has yet to be reviewed. Other outlined in Annex 2.(1) Proposed measure in chp 10. Introduce Agricultural Bye-Laws through water pollution Act 1977 to eliminate animal access to watercourses. Enforce new bye-law. Proposed supplementary measures listed in Annex B of the ERBD plan, (2) Restrict cattle access to rivers - create cattle dinking points. (3) Dept of Ag - code of Good Practice and Guidelines on the Use of Biosolids in Agriculture, 1999, (3) Riparian buffers, (4) DAFF restoration works on intensive landuse for FW Morphology, (5) Evaluate bog impact.	3 of 17	×	REPS forms part of good farming practices.

Table A3 Detailed response to DAFF Submission

Reference to Plan	Description	Page in Submission	Inclusion in Plan	Incorporation into Plan
No specific reference	Code of Good Practice on the Use of Biosolids in Agriculture , 1999 is erroneous. This code was introduced by the DEHLG.	4 of 17	√	Plan will be amended
No specific reference	FW morphology, DAFF has been listed as responsible for restoration works on intensive land use. This is not the case.	4 of 17	√	Will be reviewed.
No specific reference	National Action Plan for the sustainable use of pesticides will be the measure for ensuring objectives of the WFD. No other measures will be required for pesticides.	5 of 17	√	Can be incorporated in the next cycle of the plan.
No specific reference	Measure -prohibit use of pesticides within groundwater protection zones should be dealt with by the National Action Programme for sustainable use of pesticides.	5 of 17	√	Can be incorporated in the next cycle of the plan.
No specific reference	Measure -Licensing and distribution of DAFF's GIS mapping of cropping patterns to EPA and local authorities. This is not practical to carry out. Reason duplication of data.	6 of 17	×	Data inaccessible
No specific reference	Measure - Reporting and auditing of pesticide sales and usage by sector. As an element of EU Thematic Strategy for pesticides. Regulation will make pesticide usage surveys a statutory obligation.	6 of 17	√	Can be incorporated in the next cycle of the plan.
Table A1/Table B1	Measure- Follow Principles for Good Plant Protection Practice (use of pesticides). Question presentation of measures in table A1 and B1. This measures is already covered by Irish Legislation covering EU Directive 91/414/EEC which is 1 of the 11 basic measures.	6 of 17	×	Matter for the EPA.

Table A3 Detailed response to DAFF Submission

Reference to Plan	Description	Page in Submission	Inclusion in Plan	Incorporation into Plan
No specific reference	Measures for high status and protected areas - review controls on use and disposal of pesticides including sheep -dip. Sheep dip products are not within the remit of PCS.(pesticide control service).	7 of 17	×	Matter for the EPA.
No specific reference	All RBDs - National forestry supplementary measure - reduce pesticide usage. Clarification is required here. Pesticides with high usage rates may be benign /pesticides with lower usage rate but more toxic and therefore more impact.	7 of 17	×	Site specific implementation.
No specific reference	National Forestry Supplementary Measure- maintain registers of pesticide use. End users of plant protection products for professional use already legally required to maintain records under SI No 381 of 2006.	7 of 17	√	Will be included in basic measures.
No specific reference	National Forestry Supplementary Measure - develop biological control methods. National Action Plan to promote the sustainable use of pesticides will encourage the use of non chemical methods of plant protection etc.	7 of 17	√	NAP (pesticides) can be incorporated in the next cycle of the plan.
No specific reference	Incorrect description of the primary Irish legislation on plant protection products and omits key amendments. See page 8 of 17 in submission outlines the relevant legislation.	8 of 17	√	Plan will be amended.
No specific reference	Important to note: legislation relating to pesticides will be updated as appropriate to give effect to the EU legislation comprising the Thematic Strategy on Pesticides	8 of 17	√	Noted and will be included.
Forestry Service	No comments submitted.	-	×	Forestry Service - no comments submitted

Report on Public Consultation

In accordance with Article 14 of the Water Framework Directive, the ERBD conducted a six month public consultation period from 22nd December 2008 – 22nd June 2009. The consultation events were held at various venues throughout the ERBD and details of these can be seen in the table below. Overall 120 people attended. Organisations that attended included the Irish Farmers Association, Forest Service, Office of Public Works and Dublin Port. The following information was provided at each venue:

- Draft Plan (for ERBD and other RBDs);
- Information leaflet (English and Irish);
- Draft Environmental Report (SEA) and Appropriate Assessment;
- Comments sheet;
- River Basin Management System (on line);
- Display boards (area specific);
- WFD DVD;
- Discussion tables;
- LA to Provide – RBMS, Computer with access to www.erbd.ie;
- Role of LA and ERBD Team;
- Correlation between SEA, AA, RBMP and other Plans and Programmes.

Venue	Date	Number of Attendees
Dublin	6 th May	18
Navan	11 th May	10
Naas	12 th May	16
Tallaght	13 th May	29
Wicklow	14 th May	26
Fingal	12 th June	21

Draft River Basin Management Plan

Implementing the European Union Water Framework Directive



Public Notice: Information Meetings



A new approach is being taken to managing and protecting our natural waters (rivers, lakes, estuaries, coastal and ground waters). This has resulted in Ireland being divided into a number of river basin districts. Dublin City, Fingal, South Dublin, Dun Laoghaire Rathdown and parts of Kildare, Meath, Wicklow, Louth, Cavan, Westmeath, Offaly and Wexford are in the Eastern River Basin District. A Draft Management Plan has been prepared and it sets out a roadmap as to how the status of our natural waters will be protected and restored. The Draft Plan was published on the 22nd December 2008 and the consultation process runs until the 22nd June 2009.

Public information events on the Draft Plan are being held at 28 locations nationally so that no one has very far to travel and the Eastern River Basin District is hosting the meetings listed below. You are invited to come along and find out what is proposed to manage the waters in your area and how it might affect you and also to make any comments on the Draft Plan.

Each event will run from 4pm to 8pm

For further information, log onto www.erbd.ie

Date	Venue
6th May 2009	Dublin City Council, Civic Offices, Wood Quay, Dublin 8.
11th May 2009	Solstice Centre, Railway Street, Navan, Co. Meath.
12th May 2009	Kildare County Council, Aras an Chortae, Naas, Co. Kildare.
13th May 2009	County Library, County Hall, Tallaght, Dublin 24.
14th May 2009	Wicklow County Council, County Buildings, Wicklow Town.

EMAIL: comments@erbd.ie

POST: *River Basin Management Plan Comments*
ERBD Project Co-ordinator, Dublin City Council,
68-70 Marrowbone Lane, 4th Floor, Dublin 8

Do you think our natural waters are important?
Are you concerned about the quality of the natural waters in your area?
Do you agree that those need to be preserved as part of the Irish landscape?



Here is your chance to learn more and have your say on water matters!



On 22nd June 2007 a booklet called **Water Matters** was published throughout Ireland (available from the project website). It is all about natural water (rivers, lakes, estuaries, coastal water and groundwater) and the problems affecting them. To be able to identify the issues affecting our waters and to find solutions to address them, Ireland has been divided into eight "River Basin Districts" which are based on the natural flow of water in river catchments or basins and not traditional county boundaries.

We are the Eastern River Basin District. It incorporates all or part of twelve counties: Westmeath, Meath, Cavan, Kildare, Offaly, Fingal, Dublin City, South Dublin, Dun Laoghaire-Rathdown, Wicklow and a small portion of Wexford and Louth. Due to the high population density our River Basin District is especially sensitive.

Project website: www.erbd.ie



Looking at the booklet, you will find that it gives a general overview of the main issues affecting our waters and the next steps in dealing with them. Experts have been collecting data and identifying the main problems. However, we believe that you may have particular insight to issues in your vicinity.

The booklet focuses on the main issues in the RBD:

- Wastewater and industrial discharges
- Landfills, quarries, mines and contaminated lands
- Agriculture
- Wastewater and unsewered properties
- Forestry
- Usage and discharge of dangerous substances
- Physical modifications
- Abstractions
- Local Issues

Please answer the questions below and see overleaf for more details.

Do you think that the main problems identified in the Water Matters booklet are representative?

Are there any missing?

What particular local issues in your local area would you like to identify?

Would you visit natural waters more if they were better managed?

yes no

For what purpose?

How important is the natural water environment to you?

Extremely Very
 Moderate Unimportant

Who do you think should pay for any improvements?

Those responsible National taxpayers
 Shared cost

Who should be involved in the decisions on how problems should be addressed?



Please send your answers and other comments to the ERBD Project Coordinator to the address on the right.
The questionnaire and the Water Matters report are also available on the project website: www.erbd.ie
You can also submit your views via email: info@erbd.ie

Mr. Ray Earle
Eastern River Basin District
Project Coordinator
Dublin City Council
4th Floor, Marrowbone Lane,
Dublin 8

STAMP

ERBD Website Summary

Month	No. of Visits	No. of Pages Viewed	No. of Documents Viewed
January	2,301	6,654	3,897
February	2,441	4,777	3,070
March	2,438	6,527	3,543
April	2,237	5,130	3,790
May	2,233	5,040	3,574
June	2,038	4,499	3,161
Total	13,688	32,627	21,035



Comhshaoil, Oidhreacht agus Rialtas Áitiúil
Environment, Heritage and Local Government



eastern
river basin district



Dublin City Council
Comhairle Cathrach Bhaile Átha Cliath



comhairle chontae na mí
meath county council



Dublin City Council | Kildare County Council | Wicklow County Council | Meath County Council
Cavan County Council | Dun Laoghaire Rathdown County Council | Fingal County Council
Louth County Council | Offaly County Council | South Dublin County Council
Westmeath County Council | Wexford County Council