



Irish Wildlife Trust
Sigmund Business Centre
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Department of Housing, Planning, Community and Local Government,
Custom House,
Dublin 1

August 7th 2020

Re: Submission to the Significant Water Management Issues (SWMI) Public Consultation

To whom it may concern:

The Irish Wildlife Trust (IWT) wishes to make a submission to the Significant Water Management Issues (SWMI) Public Consultation.

The persistent decline in the quality of our waterways is now well documented. It is dispiriting that 20 years after Irish politicians agreed to the target of 'good ecological status' for all our waters, this backward slide continues. It can only be concluded that a lack of political prioritisation for protecting our environment is responsible for this – despite the fact the clean water is essential for all life on this island. The continued dumping of raw sewage to water bodies, drainage/destruction of river channels, spread of alien invasive species and plagues (e.g. affecting the White-clawed Crayfish), loss of hills to plantation forestry and unmitigated agricultural expansion continue to exact a heavy toll on our waterways. The pursuit of short-term profit which benefits the few, at the expense of wise land use and the principle of spending public money on public goods, is the root cause of the neglect of our rivers, lakes and coastal waters. This coincides with chronic loss of biodiversity, environmental and landscape degradation and dwindling of rural communities that has accelerated in recent years.

The IWT points out that the legal deadline for achieving 'good ecological status' for **all** water bodies is 2017. There is no scope therefore, for limiting the level of ambition to selected areas, as there might have been had action been taken during earlier rounds of River Basin Management Plans. Indeed, water quality has deteriorated in recent years, indicating the failure of approaches to date. It is imperative that the Irish Government take its responsibilities seriously in this regard and adopt an overarching strategy to restoring health to aquatic ecosystems. In other words, the goals of the Water Framework Directive must be brought to the centre of agriculture, forestry and planning policies as well as being a priority for infrastructure investment. The next River Basin Management Plan must be ambitious and be full aligned with the EU's Biodiversity Strategy.

A new approach to public participation must be encouraged including a wider education initiative which highlights the importance of clean water in the environment to people and nature.

There is serious concern that goals to expand agricultural production are once again set to override the common good. Chronic water pollution and collapse of aquatic ecosystems effectively robs present and future generations of the right to a clean environment in favour of the short-term economic goals of the few. There is no further scope to equivocate on this issue – farming practices must be scaled back to within the limits set by natural systems. Pollution of waterways or the drainage of land are indicators that farming is operating beyond these limits. Actions must address the failure of Nitrates derogations to reduce water pollution, land drainage and the loss of farm habitats that would otherwise help to mitigate pollution impacts – e.g. riparian buffer zones.

Investment in wastewater treatment infrastructure, both municipal and one-off septic tank systems, is not keeping pace with the requirement to restore water bodies. The State must increase the level of investment to address these issues.

The wholesale destruction of river systems continues apace through arterial drainage schemes, many of which date from the 1960s and serve no apparent function in 2020. The Arterial Drainage Act must be repealed and new legislation brought forward that prioritises restoration of river ecosystems and nature-based solutions to flooding, including reprofiling of straightened channels, reinstating flood plains and removal of barriers to migratory fish species.

Large-scale peatland restoration measures that prioritise rewetting and rewilding of degraded peatlands must be undertaken. Forestry Policy must be radically overhauled to allow the conversion of non-profitable 'legacy' plantations which threaten water quality (through conversion to native woodlands or restoration of blanket bogs). New forestry must be 'close-to-nature' for all new planting. Forestry must be compliant with national and EU law while the rights of public participation must be upheld at all stages.

The restoration of coastal and marine ecosystems must be fully recognised. This includes addressing water quality but also physical alterations to foreshore habitats, including through aquaculture.

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