

Civic Offices, Limerick Road,
Nenagh, County Tipperary



Darragh O'Brien, T.D.,
Minister for Housing, Local Government & Heritage
Custom House
Dublin 1

19th December 2022

Dear Minister O'Brien,

I am writing to you on behalf of the Water Forum (An Fóram Uisce) to express our deep concern that the River Basin Management Plan 2022 – 2027 will fail to deliver the required improvements in water quality to bring Ireland into compliance with EU and national legislation and to protect and improve this most precious natural resource.

The Water Forum welcomes the recent engagement with your officials on the draft Programme of Measures for the River Basin Management Plan and the opportunity to offer advice to the Water Policy Advisory Committee in relation to the making of the Plan. The Forum is of the view that its recommendations would increase the ambition of the Plan, to stop continuing deterioration, restore waterbodies where required, and protect waterbodies already at good or high status.

Given the cross-government nature of river basin management planning, it is important that you are both aware of these most recent recommendations of the Forum as they require action, coordination and collaboration across a number of Government Departments, Agencies and local authorities. In summary, these recommendations identify the need for:

- A greater focus on outcomes for all waterbodies in Ireland, building on available data to identify targeted measures. The Forum is asking for a written commitment in the plan to adopt this approach, which should accelerate the identification and implementation of the right measures in the right places for all waterbodies, which the Forum believes should be the purpose of the 3rd Plan.
- Increased transparency and accountability within the governance structures and implementation bodies of the RBMP, with clear roles and responsibilities outlined in the plan, particularly in relation to the management of the proposed 46 catchment plans.
- A greater sense of urgency in getting the necessary resources in place needed to implement the Plan, in particular the establishment of the new project management secretariat, a dedicated Water Framework Directive officer in each local authority and increased resourcing for both LAWPRO and ASSAP.
- Increased ambition to include public participation in the 46 catchment plans, building on learnings from pilots early in the 3rd cycle, to develop a national approach to involve communities in the management of their catchments.

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- Specific recommendations in relation to strengthening the response to all pressures on water quality, in particular agriculture, hydromorphology, forestry and urban wastewater, with a written commitment to identify and implement targeted measures for all waterbodies at risk from each pressure.

The Forum wants to be in a position to support the new Plan when published so that it can then assist through its advice with the implementation of the Plan. Recent engagement with your officials has been positive and they have indicated a willingness to take our recommendations on board. However, in the absence of clear undertakings to address our recommendations, we are very concerned that this Plan will fail to deliver for Ireland and result in further water quality declines.

We look forward to continuing engagement with your Department and officials and the Water Policy Advisory Committee to explore how we can arrive at a final River Basin Management Plan that has the broad support of all implementing bodies and stakeholders together with the governance, resourcing, public participation and necessary measures to make it a success.

Yours sincerely,

Dr Matt Crowe
Chair

Cc: Malcolm Noonan, T.D., Minister of State with Responsibility for Heritage and Electoral Reform,
Fintan Towey, David Flynn, DHLGH