



**Galway City Community Network/
Galway Environment Network**

**Submission to the Draft River Basin Management Plan
for Ireland 2022-2027**

March 2022

Preface

Established in 2014, **Galway City Community Network** (GCCN) is the Public Participation Network in Galway City. It represents groups and organisations in the community, voluntary and environmental sectors in Galway City. The **Galway Environmental Network** (GEN) is a coalition of 200 groups and individuals working towards the protection and promotion of our precious environment. GEN was formed out of an urgent need to provide a united, proactive, and positive force for change in Galway. GEN is a democratic organisation, and membership is open to all as individuals or as organisations.

GCCN Vision

The GCCN vision for Galway City is *'Galway, a creative and inclusive city that respects and values its people and communities, their wellbeing and quality of life, that will develop a vibrant, sustainable, economy and environment and participative and transparent governance'*.

GCCN Aim and Role

The aim of GCCN is to co-ordinate and support the representation of the community, voluntary and environmental sectors in Galway City and the role of GCCN is to:

- **Facilitate representation** of the community, voluntary and environmental sectors on relevant local government, local development bodies and any local, regional, national or international structures deemed appropriate by GCCN.
- Act as a platform for the community, voluntary and environmental sectors to **develop policy and positions** on issues of common concern and to advocate for these policies and positions to be implemented.
- **Strengthen capacity** of the community, voluntary and environmental sectors, including to represent GCCN on all relevant structures.
- **Provide information** relevant to the environmental, social inclusion and voluntary sectors and act as a hub around which information is received and disseminated.

GEN's Manifesto

The Galway Environmental Network is underpinned by:

- A commitment to environmental sustainability and to protecting and enhancing the environment and biodiversity in Galway.
- A commitment to collaboration.
- A commitment to add value to the work of GEN members.
- A belief in the importance of voice and a commitment to diverse participation providing opportunities for a diversity of voices on environmental issues.
- A commitment to subsidiarity and the importance of taking decisions at the lowest practicable level.
- A commitment to social and ecological resilience.
- A commitment to working in partnership with the local authority and other stakeholders.

Context

GCCN and GEN make this submission on the draft River Basin Management Plan for Ireland 2022-2027 after holding a workshop with GCCN members of the appropriate GCCN linkage groups and members of GEN.

GCCN Policy and Positions

In developing this submission, GCCN has drawn on its Policies and Positions document, the relevant sections of which state:

- The GCCN goal is the development of Galway as a clean, pollution free, post carbon city, with preserved, enhanced, and protected biodiversity, where our waterways are protected, there is wise sustainable use of resources with a well implemented Zero Waste Policy and widespread public and schools based environmental education.
- Water quality is prioritised ensuring that it is of the highest international standard and that an effective monitoring process exists for such a purpose;
- The vital importance of maintaining the integrity of and restoring forests, woodlands, wetlands, bogs and the floodplains of lakes and rivers as sustainable natural flood defences be recognised and a map of the floodplains of Galway city and its environs for public viewing compiled;
- A policy of hydro-power units along the Corrib and canals giving due cognisance to protecting biodiversity and areas of natural heritage importance is developed;
- Sensor technologies as part of a Smart City strategy are introduced, in order to improve the environment and the quality of life of people of Galway city;
- A system for ecological foot-printing for all state institutions and business in the city is established. Recent indiscriminate dredging of the sandy river by the OPW illustrates the need for this;
- Recreational use of canals incorporating a strong wildlife protection element are promoted;
- A strategy is developed that recognises the crucial role of public green spaces such as parks, forests, meadows, seashores, rivers and wetlands in the area of personal and community health;

Policy Context - Sustainable Development Goals

The Sustainable Development Goals are 17 high-level goals and associated 169 targets agreed in September 2015 by the members of the UN to guide and co-ordinate action to address a broad range of interconnected development issues until 2030. Each Goal has a set of targets to be achieved, and each target has a set of indicators that are used to measure success in reaching each target. Social Justice Ireland have compiled a monitoring report on Ireland's progress for 2019.1 Under their assessment, Ireland ranks worst on the Environment Index (13th), followed by the Economic Index (11th) and Society Index (10th). Ireland's lowest scores are for Responsible Consumption and Production (SDG 12) coming 14th out of 15 and for Affordable and Clean Energy SDG 7 (SDG 7) coming 12th. Ireland also performs poorly on Reduced Inequality (SDG 10), Climate Action (SDG 13), Industry, Innovation, and Infrastructure (SDG 9) and SDG 17 (Partnership for the Goals), ranking 11th on each of these goals. Ireland also ranks in the bottom third on Gender Equality (SDG 5) ranking 10th. These areas in particular need additional focus if the goals are to be realised by 2030.

Galway and Ireland can show leadership on sustainable development by using the SDGs as a framework for any new policy developed at a local and national level. This should recognise that the goals are cross-cutting and cross-sectoral and need to be implemented in a holistic manner by every department at both a local and national level.

Submission

Galway City Community Network and Galway Environmental Network welcomes the opportunity to make a submission on the Draft River Basin Management Plan for Ireland 2022 – 2027.

Galway City Community Network facilitates an Environment Linkage Group, members of which are drawn from and represent a variety of cross-sectoral interests in the community, voluntary and environmental sectors.

The submission is based on consultation with GCCN members that included a meeting of the GCCN Environment Linkage Group. It draws on [GCCN Policies & Positions](#) (see specifically p. 15-17) in relation to Environment that were developed collaboratively with GCCN member groups.

Ambition

- Despite some positive proposals, the draft River Basin Management Plan (RBMP) falls far short of what is required and fails to set out clearly how the State will protect and improve the water quality in all waters so that we can achieve good ecological status by 2027 at the latest.

Agriculture

- Agriculture policy must be brought in line with the Water Framework Directive (WFD) to halt escalating agricultural water pollution. A WFD – specific risk assessment for all intensive farms, including derogation farms, should be implemented through a permitting system.

Physical Modification

- All wetland drainage must be prohibited, and a national wetland restoration plan implemented.

Wastewater

- The Irish Water Investment Plan must include measures to end sewage pollution from all the wastewater treatment plants identified as the main pollution source in 208 waterbodies.

Forestry

- All planting and felling licences must include a WFD – specific assessment, with site-specific conditions to protect water. Afforestation and re-planting on peat soils in acid sensitive catchments must stop.

Coastal Water and Estuaries

- The plan cannot ignore coastal waters. It must identify the pressures specific to the coastal zone and include measures to address them.

Governance

- Water governance must be made transparent and brought into compliance with the Aarhus Convention. Participation of the public and local river groups in the development of catchment management plans must be facilitated and resourced.

Priority Action Areas for Galway

- A recognition by the local authority and Irish Water that there is an issue with the Overflows on the wastewater network in Galway City which overflow during rainfall events which are of a lower intensity than provided for in the Licence held by Irish Water. Urgent action is required to address this issue. All Stormwater Overflows should be fitted with sensors to monitor the frequency and duration of discharges and the volumes discharged. The Stormwater Overflow sensors must be continuously monitored and a point of contact within the local authority must be readily available to address any concerns with the monitoring of sensors. (Please find photographic evidence in below of raw untreated sewage in the river Corrib estuary and toxic algae at the Claddagh in Galway City.)
- Flood defences should be carefully considered for any new housing developments built near rivers e.g. Headford Road development in Galway City.
- Existing flood defences should be assessed, and any new flood defences should be carefully considered for any new housing developments built near rivers. e.g: Headford Road Development in Galway City
- Merlin Park Woods rivers on the east of Galway City should be restored and removed from the storm drain systems. This would reduce pressure on storm drain systems, acting as a natural filter for pollutants, preserving the wildlife species that depend on access to a water source. The natural wetlands areas here have been reduced since the river has been removed and this only adds to the decline of wildlife species and the overall natural habitat. Similar river restoration projects exist throughout Europe such as the 'The Lost Rivers of Paris' which are being reinstated. The Friends of Merlin Woods community are currently working with schools and local environmental society to ensure the river is restored.

General Recommendations

GCCN and GEN support [SWAN Ireland's](#) overall recommendations and include them with minor adaptations:

- A commitment to creating a real-time water quality data set that is both user friendly and easily accessible to all.
- That drinking water is continuously monitored at the first step for PFAS chemicals, industrial chemicals, tyre and road wear particles and micro-plastics AND that urgent action is taken in removing the pollutants if discovered.
- Support the Implementation of Nature Based Solutions (NBS), Green Infrastructure (GI) and Sustainable Urban Drainage (SUDS) objectives to mitigate and adapt to the impact of Climate Change. (see page 66 of the Draft RBMP).
- That the planting of trees in or near riverbanks needs to be considered carefully, particularly in respect to their impact on flooding/flood relief. [Planting trees near river banks is beneficial in that it provides shade for fish, strengthens the banks to resist erosion by the river, reduces run off from surrounding land, etc]

- That the expansion of greenways across the country should be protective of rivers and that any impact on riverbanks from human footfall should be considered and examined carefully before the opening of new greenways.
- The identification of flood plain relief areas across the country and that this should then be factored into any future land use zoning.
- Flood defences should be carefully considered for any new housing developments built near rivers e.g. Headford Road development in Galway City.
- Where appropriate and safe, community groups can engage in 'citizen science' initiatives where invasive species can be safely removed by members of the local community groups.

Comments on Proposed Measures

"Action: The National Bathing Water Expert Group to undertake a project to determine the most suitable approach to protecting bathers' health outside of the current bathing season in Dublin Bay."

In section 5.4.5, on page 67, The action above refers to 'Dublin Bay' and GCCN/GEN believes that reference should be changed to 'Ireland'

"Action: DHLGH to amend the existing Bathing Water Regulations (S.I. No. 79 of 2008) to provide discretion to local authorities on determining the bathing season for individual bathing waters"

In section 5.4.5, on page 67, The action above indicates that Local Authorities should have discretion in determining the bathing season. GCCN believes the above action would have an unintended consequence. Local Authorities are very protective of their blue flag status. They are also very protective of any publicity that would lead to them looking less attractive as a tourist destination than competing local authorities. This means that if they have discretion, they will maintain the shortest possible season for measuring water quality to avoid the wetter winter months when there is increased surface water run off which can contribute to lower quality results.

The playing field must be kept level for all local authorities. The ideal way to do this is to measure the bathing quality all year round and make the full year the mandatory season for all local authorities. This will help protect swimmers, many of whom now swim all year. All year-round swimmers are entitled to know the quality of the water in which they intend to swim so that they can make informed decisions. It may be reasonable to alter the criteria for blue flag status to allow for a new testing regime which is going to produce different results for the same beaches because winter results will be included in the average. For instance, results from sampling during the bathing season from 1st June to 15th September, as set out in the Bathing Water Regulations, could still be used to determine Blue Flag status for the defined bathing water season only.

Evidence of Sewage and Algae in Corrib Estuary



