

Draft River Basin Management Plans  
Summary of consultation responses  
October 2009



An Agency within the Department of the  
**Environment**  
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Northern Ireland  
**Environment**  
Agency

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# 1 Introduction

The Water Framework Directive (WFD) requires an integrated approach to the protection and improvement of all aspects of the water environment, including groundwaters, estuaries, coastal waters, rivers, lakes and loughs, as well as wetlands directly associated with ground or surface water. This approach is based on the production and implementation of River Basin Management Plans (RBMP).

Each plan covers a River Basin District (RBD) of which there are four designated for Northern Ireland. Only one RBD (the North Eastern) is completely contained within Northern Ireland; the remaining three (North Western, Neagh Bann and Shannon) are International River Basin Districts (IRBDs). The area of the Shannon IRBD within Northern Ireland is minimal – (approximately 2.5 sq km) and is included as part of the Shannon RBMP.

Draft RBMPs for the North Western, Neagh Bann and North Eastern River Basin Districts were published on 22 December 2008 for a period of six months consultation before the plans for 2009-2015 are published by 22 December 2009. Production and implementation of the plans is the responsibility of the Department of the Environment, in partnership with the Department of Agriculture and Rural Development, the Department of Culture, Arts and Leisure and the Department for Regional Development.

The draft plans set the current status of the water bodies within each RBD, the objectives to be achieved by 2015, 2021 and 2027 and the programme of measures required to achieve these objectives.

## 1.1 Consultation Questions

As part of the consultation the Department sought comments on the following questions:

Q1. Do you agree with the objectives and level of improvement set for Northern Ireland's water environment?

Q2. Have we identified the most significant pressures affecting the water environment?

Q3. Have we identified all the important existing measures that are being used to address these issues? Please identify any important existing measures that we have missed.

Q4. Can you identify new or existing measures or initiatives, at a regional or local level that you or your organisation can help deliver?

Q5. What suggestions do you have to improve the linkages this plan has with other relevant plans and programmes?

Q6. Do you have any suggestions to further develop and enhance arrangements for all interested parties to work together on the implementation of the plan?

## **1.2 Responses submitted**

72 substantive responses were received (including comments made at 9 Catchment Stakeholder Group meetings), with in excess of 900 comments being made. The responses submitted came from a wide range of different bodies including Environmental Non Government Organisations/Interest Groups, Angling Clubs, Water Industry, Government Departments / Agencies, District Councils, spring 2009 round of Catchment Stakeholder Group (CSG) meetings as well as members of the public. The Individuals/organisations who made substantive responses to the consultation are listed in Appendix 1. Details of those who attended the spring round of CSG meetings are available on the NIEA website [http://www.ni-environment.gov.uk/water-home/wfd/public\\_partic\\_3/catchment\\_stakeholder\\_groups.htm](http://www.ni-environment.gov.uk/water-home/wfd/public_partic_3/catchment_stakeholder_groups.htm)

## **1.3 Review of Consultation Responses**

All the comments received have been recorded and reviewed. In addition to this summary document, 5 documents have been produced to present all the consultation comments and associated responses. These documents are available on the Northern Ireland Environment Agency website: <http://www.ni-environment.gov.uk/>

The comments received covered a wide range of issues and views relating both to the content of the plans themselves and specific technical points and local issues. The comments were grouped by topic as set out in the table below.

*The following table lists the main types of response received by topic; others were received with less frequency.*

<b>Type of responses by topic</b>	<b>Number of response comments</b>
Abstraction and flow	17
Agriculture	40
Alien Species	22
Angling	3
Classification	3
Climate Change	18
Collection and Treatment of Sewage	28
Comments on Specific Catchments	19
Cost effectiveness	51
Cross Border	3
Enforcement of Regulations	20
Final Plans	133
Fisheries	3
Forestry	9
Heavily Modified Water Bodies, Weir removal, flooding	14
Hydrology	8
Implementation of the plans	9
Links with plans and programmes	56
Local Measures	4
Monitoring	12
Morphology	24
Objectives/Level of ambition	89
Other Points e.g. cross border cooperation, funding, general observations	77
Planning & Development	14
Programme of measures	51
Protected Areas	12
Raising awareness	20
Recreation & Tourism	12
Resources	7
Review of consents	5
Review of legislation	15
Septic Tanks	11
Sustainable Drainage Systems	11
Waste	23
Water Charging	24
Working Together	78

In the main the responses have been provided by NIEA, though where relevant, input has been provided by other Departments/Agencies.

All of the consultation respondents comments, the responses to those comments and confirmation of how the River Basin Management Plans have been amended where appropriate are available on the Northern Ireland Environment Agency website: <http://www.ni-environment.gov.uk/>

This report:

- provides a summary of the responses received; and
- indicates how the RBMPs have been amended, where appropriate, to address the comments received.

## **2 Summary of Consultation Responses**

This section is a summary of the comments received for respondents. The individual comments and the detailed responses to them are available on the NIEA website: <http://www.ni-environment.gov.uk/>

### **Q1. Do you agree with the objectives and level of improvement set for Northern Ireland's water environment?**

Varied response over the level of ambition; some respondents agreed with the aspirations and level of ambition whilst others viewed them as not good enough and needed to be improved to meet the requirements of the Water Framework Directive.

Some respondents felt the achievement of the objectives was not supported by the Programme of Measures. Doubts were expressed in some of the comments about the time and resources available to deal with catchment problems and felt the current financial difficulties will impact on what can be achieved.

### **Q2. Have we identified the most significant pressures affecting the water environment?**

In the main respondents felt that the most significant pressures had been identified. Though some respondents highlighted that planning and development pressures should also be included.

**Q3. Have we identified all the important existing measures that are being used to address these issues? Please identify any important existing measures that we have missed.**

A number of respondents highlighted that more detail should be provided once the measures proposed for individual water bodies and in particular how the proposed measures will contribute to an overall improvement in their condition. They also highlighted more work needed to be done on cost effectiveness and the cost and benefits of implementing the plans as no financial or budgetary information had been made available. Some made the point that the benefits/importance of angling and tourism needed to be included.

Some respondents also felt that there is insufficient information provided on how measures have been appraised and how decisions have been made. They expressed the view that the measures should be measureable and have timetables, milestones, progress reports and completion dates associated with their implementation.

A number of respondents made the point that external groups outside of government are currently involved in environmental improvements and are well placed to be further involved in the implementation of the plans. Others offered to work together with interested parties, including government departments/agencies to achieve shared goals.

**Q4. Can you identify new or existing measures or initiatives, at a regional or local level that you or your organisation can help deliver?**

Some respondents provided details on the type of work they are involved in that would contribute to the River Basin Management Plans and offered to share this information. Others confirmed their willingness to be involved in collaborative working arrangements.

**Q5. What suggestions do you have to improve the linkages this plan has with other relevant plans and programmes?**

Some respondents made the point that the linkages between the draft River Basin Management Plans and other plans and programmes were not sufficiently clear and that it would be helpful to include more detail on what the various plans and programmes would



do to support the RBMPs. Others highlighted the need for greater integration with the Floods Directive.

**Q6. Do you have any suggestions to further develop and enhance arrangements for all interested parties to work together on the implementation of the plan.**

A number of respondents were of the opinion that there was a lack of coordination in the efforts of official departments with shared involvements in environmental changes. Others highlighted the need for greater cooperation with relevant organisations in Republic of Ireland in order to ensure coordinated management of International River Basin Districts. A number made the point of the need to recognize the importance of the role of non government organisations in improving the quality of water and river habitats. They also highlighted a need for clear communication channels was required and proposed that a dedicated steering/project group be established to co-ordinate the implementation of the plan.

### **3 Detailed comments and Changes to the River Basin Management Plans**

All of the consultation respondent's comments, the responses to those comments and confirmation of how the River Basin Management Plans have been amended where appropriate are available on the Northern Ireland Environment Agency website: <http://www.ni-environment.gov.uk/>

**N. B.** This summary document contains, in detail, only those comments which relate to a change in the River Basin Management Plans.

For each of the main areas of the draft plans covered in the consultation questions the following information is provided:

- comments submitted by consultation respondents;
- a response to those comments; and

- information on how the River Basin Management Plan has been changed to take account of the consultation comment.

### **3.1 How do I find my comment in the consultation response documents?**

Please refer to the [Instructions for Searching Consultation Responses](#) document for instructions on how to search for specific comments.

### **3.2 List of consultation respondents included in this summary document**

The following table includes respondents whose comments have been included in this summary document. It is not a comprehensive list of all respondents. Please see **Appendix 1** for the entire listing.

Organisation	Name
Aquaculture Initiative	Joanne Gaffney
Armagh City Council	John Briggs
Ballynure Angling Club	John Arneill
Bangor Angling Club	David Howard
Belfast Harbour Commissioners	David Knott
Belfast Hills Partnership	Jim Bradley
British Hydropower Association	Adrian Abbott
Castlereagh Borough Council	Colin McCabrey
Clady and District Angling club	M.Dillon (sec)
Council for Nature Conservation and Countryside	Patrick Casement
Coleraine Anglers Association	Mark Henderson
Committee for Regional Development and Environment Committee	Clerk to the Environment Committee & Committee for Regional Development
Craigavon Borough Council	Rosemary Mulholland
Derry City Council	John Kelpie

Organisation	Name
Down District Council	Cllr Cadogan Enright
Department of Regional Development Water Policy Division	Stuart Wightman
Fermanagh District council	Martina Magee
Friends of Larne Lough	John Anderson
Freshwater Task Force	Claire Cockerill
Farming and Wildlife Advisory Group NI	Sean Convery
Irish Business Employers Confederation	Conor Gouldsbury
Irish Business Employers Confederation	Seamus O'Connell
Iveagh Angling Club	Gary Houston
Keady District Angling Club	Keady District Angling Club
Lagan Canal Restoration Trust	Cathy Burns
Land and Resource Management Group NIEA	Fiona Wilson
Lisburn City Council	Suzanne Lutton
Londonderry Port and Harbour commissioners	Bill McCann
Loughs Agency	Declan Lawlor
National Trust	Andrew McDowell
Natural living Assets	Brendan Kerr
Newcastle Sustainable Community Planning Forum	Helena Rafferty
NI Water	George Butler
NI Water	Angela Halpenny
Public	Dawson McAlister
Public	Dr Bob Common
Public	John Cunningham
Public	James Gorman
Public	Milton Matthews
Public	Roy Carton

Organisation	Name
Quarry Products Association NI	Laverne Bell
Randalstown Angling Club	Brian McKinley
Rivers Agency	P. McCrudden
Road Service	Andrew Murray
Royal Society for the Protection of Birds NI	John Martin
Public	Tim Gleeson
The Consumer Council	Jennifer Robinson
Ulster Farmers Union	Aileen Lawson
Ulster Angling Federation	Jim Haughey
Warrenpoint Harbour Authority	Captain B.K.McJury
Shay Murtagh Ltd.	Shay Murtagh Ltd.
World Wildlife Fund NI	Claire Cockerill
Stakeholders attending	CSG Meeting: Belfast Lough and Lagan
Stakeholders attending	CSG Meeting: Bush and Glens
Stakeholders attending	CSG Meeting: Carlingford and Mourne
Stakeholders attending	CSG Meeting: Erne and Melvin
Stakeholders attending	CSG Meeting: Lower Foyle
Stakeholders attending	CSG Meeting: Lower Neagh Bann
Stakeholders attending	CSG Meeting: Strangford and Lecale
Stakeholders attending	CSG Meeting: Upper Foyle

### 3.3 Objectives and level of improvement set for Northern Ireland's water environment

Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
dRBMPC on23/2	Clair Cockerill	Freshwater Task Force	There is currently a heavy reliance on existing strategies, schemes and programmes which will be insufficient to raise water quality in the c.70% of water bodies that do not achieve good ecological status. Commitment to implementing a greater number of new measures is required to ensure essential additional action is put in place to facilitate achievement of the WFD objectives.	<p>In some cases the existing measures may be sufficient to deliver the water quality objectives but there will be a number of other water bodies that will require supplementary or additional measures.</p> <p>NIEA has subdivided the three River Basin Districts onto 26 Local Management Areas (LMAs) , which are based on sub basin catchments. Details of these areas were included as part of the supporting documentation for the consultation on the draft plans. The LMAs are being used as the level at which measures will be set and it is planned to develop action plans to implement the RBMPs in these areas. The action plans will be implemented on a three year rolling programme to allow resources to be targeted</p> <p>In some cases further investigation is needed to gain a better understanding of the pressures before we finalise the measures that will be employed to deliver the improvements in the life time of the plan. We will also continue to review the effectiveness of the existing measures and assess the need for further measures and their cost effectiveness during the 6 year life of the plan.</p>	The RBMP will include more information on the measures required to meet the objectives in each of the 26 LMAs. As part of the RBMP Implementation Programme actions plans will be developed for each LMA in liaison with stakeholder groups active in those areas.
dRBMPC on23/13	Clair Cockerill	Freshwater Task Force	The Freshwater Taskforce believes that ambitions for Northern Ireland's water	The level of ambition set out in the plan is higher than in the rest of the UK and we have sought to	The objectives have been

Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
	Cockrill	Task Force	<p>environments should be higher in order to be consistent with the spirit of the WFD. The plans should clearly set out how the WFD will be achieved at individual water body and River Basin District level. The Table below outlines the lack of ambition across the various RBMPs.</p> <p>R B M P Good Status by 2015</p> <p>Actions Implemented Over Longer Period</p> <p>Neagh Bann</p> <p>Surface Water bodies 165 of 264 (63%) 99</p> <p>Groundwaters 13 of 14 (93%) 1</p> <p>North Eastern</p> <p>Surface Water bodies 76 of 133 (57%) 57</p> <p>Groundwaters 6 of 8 (75%) 2</p> <p>North Western</p> <p>Surface Water bodies 173 of 204 (85%) 31</p> <p>Groundwaters 45 of 45 (100%) -</p>	<p>establish objectives that are challenging but are realistic in terms of achievement. The initial set objectives, using the rules established in the plan, have been reviewed by expert working groups to consider if higher objectives could be achieved within the life of the plan or whether the objectives are unrealistic given the current knowledge and understanding of the pressures on individual water bodies and the effectiveness of the available measures. The costs of achieving the objectives are also a consideration, this will be reviewed during the life of the plan and new legislative measures will be subject to a regulatory impact assessment in relation to their cost effectiveness. NIEA has subdivided the three River Basin Districts onto 26 Local Management Areas (LMAs), which are based on sub basin catchments. Details of these areas were included as part of the supporting documentation for the consultation on the draft plans. The LMAs are being used as the level at which measures will be set and it is planned to develop action plans to implement the RBMPs in these areas. The action plans will be implemented on a three year rolling programme to allow resources to be targeted</p>	<p>updated. The RBMP will include more information on the measures required to meet the objectives in each of the 26 LMAs. As part of the RBMP Implementation Programme actions plans will be developed for each LMA in liaison with stakeholder groups active in those areas.</p>

Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
dRBMPC on23/14	Clair Cockerill	Freshwater Task Force	The current objective to raise quality by one level between now and 2015 (e.g. from poor to moderate or from moderate to good) is not in keeping with the primary objective of WFD which states that all water bodies should have reached 'good' status by 2015. DOE should have a target of Good Ecological Status (GES) by 2015 to demonstrate its commitment to a phased approach.	The Water Framework Directive establishes the primary aim of achieving good ecological status in all water bodies by 2015 but allows for a phased achievement of the objectives over a longer period of time providing certain conditions apply. This requires that there is no further deterioration in the status of the water body and that improvements cannot reasonably be met within the timescale, due to reasons of technical infeasibility or it would be disproportionately expensive or natural conditions would not allow ecological recovery within that timescale. Where these conditions apply the Directive allows for an extended deadline to be set. NIEA will be setting out for each water body where an extended deadline applies the reason for that extension in the RBMP	Additional information on the reasons for setting alternative objectives through the use of extended deadlines is now included.
dRBMPC on23/21	Clair Cockerill	Freshwater Task Force	The RBMPs do not clearly set out a plan for achieving WFD objectives in all water bodies. While stating that the environmental objectives of the Plans are to "provide at least good status for all water bodies; prevent deterioration in status; promote sustainable development; and achieve specific standards for protected areas", the Plans fail to provide sufficient detail to cause optimism that these objectives will be achieved	NIEA has subdivided the three River Basin Districts onto 26 Local Management Areas (LMAs) , which are based on sub basin catchments. Details of these areas were included as part of the supporting documentation for the consultation on the draft plans. The LMAs are being used as the level at which measures will be set and it is planned to develop action plans to implement the RBMPs in these areas. The action plans will be implemented on a three year rolling programme to allow resources to be targeted	The RBMP will include more information on the measures required to meet the objectives in each of the 26 LMAs.
dRBMPC on23/23	Clair Cockerill	Freshwater Task Force	Summary of : <ul style="list-style-type: none"> <li>• Greater levels of ambition are required to be consistent with the spirit of the WFD</li> <li>• Plans should clearly map out how</li> </ul>	The level of ambition set out in the plan is higher than in the rest of the UK and we have sought to establish objectives that are challenging but are realistic in terms of achievement. The initial set	The RBMP will include more information on the measures

Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
			<p>improvements in water quality status will be achieved</p> <ul style="list-style-type: none"> <li>• Alternative objectives should be fully justified</li> <li>• Monitoring and classification approaches are incomplete, lack transparency and not all water bodies have been assessed</li> <li>• More information is required at local level</li> </ul>	<p>objectives, using the rules established in the plan, have been reviewed by expert working groups to consider if higher objectives could be achieved within the life of the plan or whether the objectives are unrealistic given the current knowledge and understanding of the pressures on individual water bodies and the effectiveness of the available measures. The costs of achieving the objectives are also a consideration, this will be reviewed during the life of the plan and new legislative measures will be subject to a regulatory impact assessment in relation to their cost effectiveness. NIEA has subdivided the three River Basin Districts onto 26 Local Management Areas (LMAs), which are based on sub basin catchments. Details of these areas were included as part of the supporting documentation for the consultation on the draft plans. The LMAs are being used as the level at which measures will be set and it is planned to develop action plans to implement the RBMPs in these areas. The action plans will be implemented on a three year rolling programme to allow resources to be targeted</p>	<p>required to meet the objectives in each of the 26 LMAs. As part of the RBMP Implementation Programme actions plans will be developed for each LMA in liaison with stakeholder groups active in those areas</p>
dRBMPC on23/29	Claire Cockrill	Freshwater Task Force	<p>Climate change is a key reason for raising the ambition; the more improvements we make in the first cycle, the more resilient our waters will be to future changes. Serious consideration must be given to reviewing the design standards for WWTW in the light of climate change.</p>	<p>The changes that may result as a consequence of climate change need to be better understood. The predictive modeling of the effects of climate change that has recently become available will be employed in assessing the implications of climate change on the environment and in particular hydrology during the first cycle of the plan. This will inform the changes that need to be made to the</p>	<p>Section on Climate Change has been updated.</p>



Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
				<p>plan for the 2nd cycle and any additional measures, including those associated with decreasing the impact of WWTW discharges where that is considered an issue.</p>	
dRBMPCon23/31	Clair Cockerill	Freshwater Task Force	<p>Have we identified all the important existing measures or initiatives that are being used to address these issues? Please identify any important existing measures that we have missed.</p> <p>The Freshwater Taskforce believes there is an overreliance on existing measures and initiatives. Within the existing draft plans, NIEA has compiled a useful inventory of legislation for each of the pressures identified in section 5 of the draft Plans. The Taskforce is not convinced that the existing measures and initiatives will achieve the objectives set for 2015 given that only 30% of freshwater bodies covered by the Northern Ireland RBMPs have achieved the status of water quality required by the Water Framework Directive.</p>	<p>In some cases the existing measures may be sufficient to deliver the water quality objectives but there will be a number of other water bodies that will require supplementary or additional measures.</p> <p>NIEA has subdivided the three River Basin Districts onto 26 Local Management Areas (LMAs) , which are based on sub basin catchments. Details of these areas were included as part of the supporting documentation for the consultation on the draft plans. The LMAs are being used as the level at which measures will be set and it is planned to develop action plans to implement the RBMPs in these areas. The action plans will be implemented on a three year rolling programme to allow resources to be targeted</p> <p>In some cases further investigation is needed to gain a better understanding of the pressures before we finalise the measures that will be employed to deliver the improvements in the life time of the plan. We will also continue to review the effectiveness of the existing measures and assess the need for further measures and their cost effectiveness</p>	<p>A number of supplementary measures have been identified. The RBMP will include more information on the measures required to meet the objectives in each of the 26 LMAs. As part of the RBMP Implementation Programme actions plans will be developed for each LMA in liaison with stakeholder groups active in those areas</p>

Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
				during the 6 year life of the plan.	
dRBMPCon23/106	Clair Cockrill	Freshwater Task Force	5.3.6 – Capital Works Programme review that is discussed should prioritise works on the basis of compliance with WFD objectives. Where a water body is failing to meet good ecological/chemical status, there should be compulsory investment. Social and economic benefits should be secondary or factor in cost of non-compliance. This review would form a real contribution to 2015 targets. More information on this will be included in the final plans but not in time for consultation.	The priority list has been defined taking account, as far as possible, of WFD objectives. All waste water treatment works have been set environmental needs standards which anticipated the WFD standards and these have been used as standards to be met for investment planning purposes. Failure to achieve good status may not be entirely the fault of NIW assets and other measures will contribute to a greater or lesser extent. More detailed studies of Local Management Areas will identify where investment in sewage infrastructure will have most impact and this will inform the next price control process.	The RBMP will include more information on the measures required to meet the objectives in each of the 26 LMAs. As part of the RBMP Implementation Programme actions plans will be developed for each LMA in liaison with stakeholder groups active in those areas.
dRBMPCon24/7	Brendan Kerr	Natural living Assets	The River Basin Management Plans need to provide milestones towards better managed rivers, beyond simply measuring parameters and pollution incidents. For example what steps will be taken to achieve planned aims utilizing opportunities for “New Green Deal” and “green collar” employment.	NIEA will be seeking to prioritise assessments within the River Basin Districts on a Local Management Area basis. This will involve carrying out investigations, assessing the effectiveness of measures, including local initiatives, and instigating new measures where necessary. NIEA also plan to develop river quality models of the river catchments to identify where significant changes in water quality are occurring and predict how changes to the system would affect water quality. We welcome and would seek to support the involvement of other	The RBMP will include more information on the measures required to meet the objectives in each of the 26 LMAs. As part of the RBMP Implementation

Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
				groups in taking forward initiatives to improve water quality and would encourage them to participate in the Catchment Stakeholder Groups and complete our Projects Aiming to Improve Aquatic Resources (PAIRS) form on our web site to provide details.	Programme actions plans will be developed for each LMA in liaison with stakeholder groups active in those areas
dRBMPC on24/8	Brendan Kerr	Natural living Assets	Where a river within its catchment adds or has the potential to add to the local socio economic value of the local economy by protecting the Atlantic salmon and sea trout resource then the priority to enhancing quality habitat should be increased.	NIEA appreciates that improving water quality can result in national as well as local socio economic benefits and this will be taken on board where possible. However, NIEA's priority must be to improve water quality where it is less than good, whether or not there are clear socio economic benefits. The benefits that do arise from improving the quality of our environment should strengthen the case for enhancing and sustaining enhanced water quality. The Department has engaged consultants to prepare a strategic impact assessment on costs and benefits of proposed new measures over and above basic measures that are required irrespective of WFD.. The strategic impact assessment will be included in the River Basin Management Plans to be published in December 2009.	The strategic RIA will be published along with the RBMPs.

Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
dRBMPC on26/1	Cathy Burns	Lagan Canal Restoration Trust	In the draft Plan, the principle was applied that each water body should be improved by at least one class in each six-year river basin planning cycle. Lagan Canal Restoration Trust agrees that in order for N. Ireland to comply with the requirements of the Water Framework Directive, it is necessary to set ambitious targets and levels of improvement. It is clear that these will require significant investment both from the public and private sectors.	The level of ambition set out in the plan is higher than in the rest of the UK and we have sought to establish objectives that are challenging but are realistic in terms of achievement. The initial set objectives, using the rules established in the plan, have been reviewed by expert working groups to consider if higher objectives could be achieved within the life of the plan or whether the objectives are unrealistic given the current knowledge and understanding of the pressures on individual water bodies and the effectiveness of the available measures. The costs of achieving the objectives are also a consideration, this will be reviewed during the life of the plan and new legislative measures will be subject to a regulatory impact assessment in relation to their cost effectiveness. The Department has engaged consultants to prepare a strategic impact assessment on costs and benefits of proposed new measures over and above basic measures that are required irrespective of WFD. The strategic impact assessment will be included in the River Basin Management Plans to be published in December 2009.	The strategic RIA will be published along with the RBMPs.

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dRBMPCon2777	Brian McKinley	Randalstown Angling Club	<p>Ques 1 The Objectives are not good enough and need to be greatly enhanced.</p> <p>Ques 2 Most of the pressures have been identified, but it is resolute action to address these which is missing.</p> <p>Ques 3 no comment</p> <p>Ques 4 no comment</p> <p>Ques 5 no comment</p> <p>Ques 6 Greatly enhanced Objectives will be a stimulus for co-operation and morale.</p>	<p>The level of ambition set out in the plan is higher than in the rest of the UK and we have sought to establish objectives that are challenging but are realistic in terms of achievement. The initial set objectives, using the rules established in the plan, have been reviewed by expert working groups to consider if higher objectives could be achieved within the life of the plan or whether the objectives are unrealistic given the current knowledge and understanding of the pressures on individual water bodies and the effectiveness of the available measures. The costs of achieving the objectives are also a consideration, this will be reviewed during the life of the plan and new legislative measures will be subject to a regulatory impact assessment in relation to their cost effectiveness. NIEA has subdivided the three River Basin Districts onto 26 Local Management Areas (LMAs) , which are based on sub basin catchments. Details of these areas were included as part of the supporting documentation for the consultation on the draft plans. The LMAs are being used as the level at which measures will be set and it is planned to develop action plans to implement the RBMPs in these areas. The action plans will be implemented on a three year rolling programme to allow resources to be targeted</p>	<p>The RBMP will include more information on the measures required to meet the objectives in each of the 26 LMAs. As part of the RBMP Implementation Programme actions plans will be developed for each LMA in liaison with stakeholder groups active in those areas</p>

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dRBMPC on30/1	David Knott	Belfast Harbour Commissioners	Belfast Harbour Commissioners agrees in principle to the objectives. We welcome the approach taken and recognition of the critical importance of the ports to the NI economy. The aspiration to achieve incremental improvement by one class during each 6 year planning cycle is generally considered to be practical and realistic. In some cases instances baseline monitoring data is absent or inadequate, in such cases it must be recognized that data gathering and analysis is a legitimate action during the first planning cycle. This may delay implementation of measurable physical improvements to the second planning cycle commencing in 2016. It is our opinion that the draft plan does not accurately classify the status of HMWB's within the port of Belfast limits. Based on work conducted during the NI Ports and Harbour's workshop with NIEA and DRD (22nd April 2009) and the subsequent identification and analysis of ecological impact against existing mitigation measures, Belfast Harbour should be classified as having achieved GEP. (Ref GBN16NE 100)	The comment that Belfast Harbour has already obtained good ecological potential is noted. The classification has been reviewed for the RBMP taking into account the existing mitigation and the impacts of other pressures.	The updated status has been included.
dRBMPC on34/1	Gary Houston	Iveagh Angling Club	<p>1 Good Status must be achieved by 2015.</p> <p>2 There is a lack of basic information; for any given waterway, there is no list of the specific pollution inputs, and no specific plan to deal with them.</p> <p>3 These issues receive insufficient attention;</p> <ul style="list-style-type: none"> <li>• Riverbank development including damage to banks and habitats.</li> <li>• Hydro-electric schemes.</li> </ul>	NIEA has subdivided the three River Basin Districts onto 26 Local Management Areas (LMAs) , which are based on sub basin catchments. Details of these areas were included as part of the supporting documentation for the consultation on the draft plans. The LMAs are being used as the level at which measures will be set and it is planned to develop action plans to implement the RBMPs in these areas. The action plans will be implemented	The RBMP will include more information on the measures required to meet the objectives in each of the 26 LMAs. As part

Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
			<ul style="list-style-type: none"> <li>• Canal reinstatement and development.</li> <li>• Septic Tanks.</li> <li>• Climate Change.</li> <li>• Review of existing Consents in the context of lower summer flows as a result of climate change. Lack of control on abstractions, river currently being dewatered.</li> </ul> <p>4 The reliance on UKTAG is a crucial weakness and needs to be changed.</p> <p>5 The success of the RBMPs depends on adequate enforcement; the proposed "Revised Enforcement &amp; Prosecution Policy 2009" is clearly a substantial retreat by NIEA from any reasonable enforcement regime, will give encouragement to polluters, and requires a radical re-think.</p> <p>6 The stakeholders meetings provide little detail of what is happening in catchments, chair of the meeting needs to pass to the No's and action points raised.</p>	<p>on a three year rolling programme to allow resources to be targeted</p> <p>For "non-consumptive" (i.e. hydro-schemes) abstractions the water body itself is not abstracted, as there is no net loss of natural flow. This is the case in most hydro-schemes diverting and returning volumes over a stretch of river. In such proposals the issue of the de-watering of a stretch has to be addressed as this activity may be detrimental to the ecological functionality of the entire waterbody to the extent that the overall ecological status of the waterbody is degraded.</p> <p>Effective, robust enforcement is an essential part of NIEA's weaponry to protect the environment and increase compliance with environmental legislation. The creation of the Agency-wide Environmental Crime Unit and the revised enforcement policy clearly demonstrate the Agency's commitment to firm and consistent enforcement.</p> <p>The revised enforcement policy clearly states that there will be firm action taken in the case of serious offences, with pollution considered to be in this category, and indeed that the Agency continues to work to strengthen its enforcement powers.</p> <p>It should be noted that the enforcement policy encompasses NIEA's approach to the full spectrum of environmental offences, from technical breaches to serious environmental damage cases. In our role to protect the environment, we must also focus on pro-active, preventative activity to advise and</p>	<p>of the RBMP Implementation Programme actions plans will be developed for each LMA in liaison with stakeholder groups active in those areas.</p> <p>A document on heavily modified waterbodies to be provided as a supporting document to the RBMP is being produced.</p> <p>Section on Collection and Treatment of Sewage has been updated.</p> <p>Section on Climate Change has been updated.</p>

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				<p>support industry to implement sustainable practices and comply with legislation.</p> <p>NIEA actively seeks to engage with all stakeholders interested in the water environment through nine Catchment Stakeholder Groups (CSG) which meet biannually. The CSGs consist of representatives from Government Departments/ Agencies, angling groups, NGOs, landowners, and members of the public, that work together to address local water management issues. The CSG meetings enable stakeholders to engage with the statutory authorities in order to influence decisions on how the Water Framework Directive is implemented in Northern Ireland. The group share local knowledge and expertise so as to address and resolve local water management issues.</p>	
dRBMPCon35/1	Jim Bradley	Belfast Hills Partnership	<p>The first general point to be made is that many of these points would just as equally relate to the other draft River Basin Plans and should be taken into account in those as well as the North Eastern consultation exercise. For instance, it would be useful for those bodies of water whose status is outlined via the figures in the classification sections be identified in an accessible way e.g. in reports or websites. This would mean that the status of individual local water bodies would be easily available to individuals and communities. While the amount of information given in the website is impressive, there will be a great demand for very local information including individual water body</p>	<p>Access to the status of individual water bodies, including the status of the individual elements that are failing good status and resulting in an overall ecological status less than Good, is available through the interactive web map facility on the NIEA web site.</p> <p>NIEA has subdivided the three River Basin Districts onto 26 Local Management Areas (LMAs), which are based on sub basin catchments. Details of these areas were included as part of the supporting documentation for the consultation on the draft plans. The LMAs are being used as the level at which measures will be set and it is planned to develop action plans to implement the RBMPs in these areas. The action plans will be implemented</p>	<p>A document on heavily modified waterbodies to be provided as a supporting document to the RBMP is being produced.</p>



Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
			<p>classification and specific criteria measurements. Secondly, consideration should be given to presenting this status information in terms of river length or water body area as well as numbers of water bodies. Numbers of bodies could still be used for target purposes, but it is felt that this would give a more complete picture of status. Our final general point is a concern over the use of the classification 'Heavily Modified Water Body'. While we can see merit in the rationale for such a classification we would have grave concerns as to how these are identified, the different ways in which these are then monitored and managed and the impact that this then has on the general status of Northern Ireland's water bodies. There would be a potential perceived temptation to judge what is a difficult water body to manage as a 'heavily modified water body' if this leads to less stringent management and monitoring requirements. This also highlights the need for separation of classification, monitoring and management roles in general. We would emphasise that this could well be more of a problem of perception rather than actual practice.</p>	<p>on a three year rolling programme to allow resources to be targeted.</p> <p>The use of the Heavily Modified Water Body (HMWB) designation applies where a water body is so affected by human activity such as; drinking water supply, flood defence and navigation, that it no longer functions naturally and achievement of good status is considered to be technically infeasible or disproportionately expensive. However, measures still need to be taken to mitigate the impact of the human activity and maximise improvement in ecological quality but it may still not be feasible to deliver good status. At this stage, when it is considered the improvements have been maximised, the alternative objective of Good Ecological Potential has been reached. Although not all elements may be at Good status under Good Ecological Potential, no deterioration is allowed in the quality of the elements as initially classified. This is not therefore an easy option as additional assessments have to be made in assessing the human activities, identifying appropriate measures and carrying out an economic analysis. The designation of the HMWBs was a process initially commenced in 2005 under the Article 5 characterisation process that produced a list of potential HMWBs. This list was reviewed as additional information became available and refined using the Rapid Designation Technique developed by SEPA and endorsed by UKTag (the UK Technical Advisory Group). The refined list was further reviewed through a workshop attended by a</p>	

Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
				number of sector representatives. Further details will be available in the supporting documents on the Web site.	
dRBMPCon38/1	John Arneill	Ballynure Angling Club	<p>1 The extended deadlines for Good Status must be improved.</p> <p>2 There is a lack of basic information; for any given waterway, there is no list of the specific pollution inputs, and no specific plan to deal with them.</p> <p>3 These issues receive insufficient attention;</p> <ul style="list-style-type: none"> <li>• Riverbank development including damage to banks and habitats.</li> <li>• Hydro-electric schemes.</li> <li>• Canal reinstatement and development.</li> <li>• Septic Tanks.</li> <li>• Climate Change.</li> </ul> <p>• Review of existing Consents in the context of lower summer flows as a result of climate change. Lack of control on abstractions, river currently being dewatered.</p> <p>4 The reliance on UKTAG is a crucial weakness and needs to be changed.</p> <p>5 The success of the RBMPs depends on adequate enforcement; the proposed "Revised Enforcement &amp; Prosecution Policy 2009" is clearly a substantial retreat by NIEA from any reasonable enforcement regime, will give encouragement to polluters, and requires a radical re-think.</p> <p>6 The stakeholders meetings provide little detail of what is happening in catchments, chair of the meeting needs to pass to the NGO's and action</p>	<p>NIEA has subdivided the three River Basin Districts onto 26 Local Management Areas (LMAs) , which are based on sub basin catchments. Details of these areas were included as part of the supporting documentation for the consultation on the draft plans. The LMAs are being used as the level at which measures will be set and it is planned to develop action plans to implement the RBMPs in these areas. The action plans will be implemented on a three year rolling programme to allow resources to be targeted.</p> <p>For "non-consumptive" (i.e. hydro-schemes) abstractions the water body itself is not abstracted, as there is no net loss of natural flow. This is the case in most hydro-schemes diverting and returning volumes over a stretch of river. In such proposals the issue of the de-watering of a stretch has to be addressed as this activity may be detrimental to the ecological functionality of the entire waterbody to the extent that the overall ecological status of the waterbody is degraded.</p> <p>Effective, robust enforcement is an essential part of NIEA's weaponry to protect the environment and increase compliance with environmental legislation. The creation of the Agency-wide Environmental Crime Unit and the revised enforcement policy clearly demonstrate the Agency's commitment to firm and consistent enforcement.</p>	<p>The RBMP will include more information on the measures required to meet the objectives in each of the 26 LMAs. As part of the RBMP Implementation Programme actions plans will be developed for each LMA in liaison with stakeholder groups active in those areas.</p>

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			points raised.	<p>The revised enforcement policy clearly states that there will be firm action taken in the case of serious offences, with pollution considered to be in this category, and indeed that the Agency continues to work to strengthen its enforcement powers. It should be noted that the enforcement policy encompasses NIEA's approach to the full spectrum of environmental offences, from technical breaches to serious environmental damage cases. In our role to protect the environment, we must also focus on pro-active, preventative activity to advise and support industry to implement sustainable practices and comply with legislation.</p> <p>NIEA actively seeks to engage with all stakeholders interested in the water environment through nine Catchment Stakeholder Groups (CSG) which meet biannually. The CSGs consist of representatives from Government Departments/ Agencies, angling groups, NGOs, landowners, and members of the public, that work together to address local water management issues. The CSG meetings enable stakeholders to engage with the statutory authorities in order to influence decisions on how the Water Framework Directive is implemented in Northern Ireland. The group share local knowledge and expertise so as to address and resolve local water management issues.</p>	

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dRBMPCon38/2	John Arneill	Ballynure Angling Club	The following comments are made in the knowledge that in NI more than 40% of our rivers fail to meet the good standard of biological river quality, and the water quality of our lakes continues to deteriorate. Existing strategies and programmes are not working as well as needed. Unless significant improvements NI is going to fall short of the targets of the WFD.	The Water Framework Directive has introduced a more comprehensive water quality classification system than previously employed in Northern Ireland and provides a clear driver to improve the biological water quality. It is accepted therefore that this will require new approaches to delivering the additional requirements, that the Directive introduces. The Programme of Measures seeks to capture a number of new planned and additional measures that will assist in delivering improved water quality and the consultation with stakeholders has sought to inform the development of the programme. The Directive also provides a clear driver to address a variety of pressures within the environment that impacts upon water quality and this will assist in seeking to implement the strategies and programmes that are set out in the RBMP to address any adverse trends and improve water quality.	The RBMP will include more information on the measures required to meet the objectives in each of the 26 LMAs. As part of the RBMP Implementation Programme actions plans will be developed for each LMA in liaison with stakeholder groups active in those areas.
dRBMPCon38/3	John Arneill	Ballynure Angling Club	We are concerned with the low level of ambition in the 1st River Basin Management Plan cycle. As the plans stand at present, we do not feel they form part of a credible strategy for WFD delivery over the next eighteen years. We believe in order to achieve GES in all water bodies, more needs to be done to address pollution and the effects of climate change reducing summer flow rates needs to be brought into the core of the process. We urge NIEA to tackle these two fundamental issues threatening	The National Stakeholder Forum membership covers a wide range of interests, including the environment, industry, agriculture and conservation. In addition to the Forum, nine Catchment Stakeholder Groups have been set up to provide an opportunity for anyone interested in local water issues to identify their concerns to both Statutory Agencies and non-governmental organisations, and to have these addressed at local level. The level of ambition set out in the plan is higher	Section on Climate Change has been updated.

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			<p>Good status. We feel the process lacks transparency, which makes it impossible for the stakeholders to understand how decisions have been made.</p>	<p>than in the rest of the UK and we have sought to establish objectives that are challenging but are realistic in terms of achievement. The initial objectives set using the rules established in the plan, were subject to review by expert working groups to consider if higher objectives could be achieved within the life of the plan or whether the objectives are unrealistic given the current knowledge and understanding of the pressures on individual waterbodies and the effectiveness of the available measures. The costs of achieving the objectives are also a consideration. These will be reviewed during the life of the plan, as will the objectives and the programme of measures. The RBMP covers the period 2009 – 2015 and should not be seen as fixed over the 18 years that it references but is subject to two further reviews at 6 yearly cycles and allows for adjustment. However, it is preferable that we set out an achievable and realistic plan at this stage, rather than having to make significant changes in the future. The changes that may result as a consequence of climate change need to be better understood. The predictive modeling of the effects of climate change that has recently become available will be employed in assessing the implications of climate change on the environment and in particular hydrology during the first cycle of the plan. This will inform the changes that need to be made to the plan for the 2nd cycle and any additional measures, including those associated with decreasing the impact of WWTW discharges where that is</p>	

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				considered an issue.	
dRBMPCon44/2	James Gorman	Public	b. The draft plan outlines a significant number of objectives and how these are linked to the plan. However when you look for the detail of measures proposed for a water body there is a lack of tangible/specific measures for a particular water body.	NIEA has subdivided the three River Basin Districts onto 26 Local Management Areas (LMAs) , which are based on sub basin catchments. Details of these areas were included as part of the supporting documentation for the consultation on the draft plans. The LMAs are being used as the level at which measures will be set and it is planned to develop action plans to implement the RBMPs in these areas. The action plans will be implemented on a three year rolling programme to allow resources to be targeted.	The RBMP will include more information on the measures required to meet the objectives in each of the 26 LMAs. As part of the RBMP Implementation Programme actions plans will be developed for each LMA in liaison with stakeholder groups active in those areas.
dRBMPCon50/1	Adrian Abbot	British Hydropower Association	BHA support a cautious approach by the Northern Ireland Environment Agency in adopting the setting of objectives and defining Programmes of Measures to meet them. We believe that the competent authorities need a high level confidence in the existence of a real problem before taking action to solve it and full consideration needs to be made to technical feasibility and the balance of costs.	In a number of water bodies we have identified the need for further investigation to ensure that the pressures affecting water quality are better understood and the measures necessary to address the situation are appropriately targeted. This may cause a delay in attaining good status or ecological potential but is considered necessary to use the resources available effectively. The Department has engaged consultants to prepare a strategic impact assessment on costs	The strategic RIA will be published along with the RBMPs.

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				and benefits of proposed new measures over and above basic measures that are required irrespective of WFD. The strategic impact assessment will be included in the River Basin Management Plans to be published in December 2009.	
dRBMPC on55/1	Jim Haughey	Ulster Angling Federation	The following comments are made in the knowledge that in Northern Ireland more than 40% of our rivers fail to meet the “good” standard of biological river quality, and the water quality of our lakes continues to deteriorate. It is therefore reasonable to suggest that existing strategies and programmes are not working as well as needed. Unless there are significant improvements to the Plans we feel Northern Ireland is going to fall short of the targets of the Water Framework Directive.	The Water Framework Directive has introduced a more comprehensive water quality classification system than previously employed in Northern Ireland and provides a clear driver to improve the biological water quality. It is accepted therefore that this will require new approaches to delivering the additional requirements, that the Directive introduces. The Programme of Measures seeks to capture a number of new planned and additional measures that will assist in delivering improved water quality and the consultation with stakeholders has sought to inform the development of the programme. The Directive also provides a clear driver to address a variety of pressures within the environment that impacts upon water quality and this will assist in seeking to implement the strategies and programmes that are set out in the RBMP to address any adverse trends and improve water quality.	The RBMP will include more information on the measures required to meet the objectives in each of the 26 LMAs. As part of the RBMP Implementation Programme actions plans will be developed for each LMA in liaison with stakeholder groups active in those areas.

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dRBMPCon55/2	Jim Haughey	Ulster Angling Federation	Overall, we are concerned with the extremely low level of ambition in the first River Basin Management Plan (RBMP) cycle. We do not feel this demonstrates a sufficient commitment to achieving 'good ecological status' (GES) in all water bodies. As the Plans stand at present, we do not feel they form part of a credible strategy for WFD delivery over the next eighteen years.	The level of ambition set out in the plan is higher than in the rest of the UK and we have sought to establish objectives that are challenging but are realistic in terms of achievement. The initial objectives set using the rules established in the plan, were subject to review by expert working groups to consider if higher objectives could be achieved within the life of the plan or whether the objectives are unrealistic given the current knowledge and understanding of the pressures on individual waterbodies and the effectiveness of the available measures. The costs of achieving the objectives are also a consideration, these will be reviewed during the life of the plan, as will the objectives and the programme of measures. The RBMP covers the period 2009 – 2015 and should not be seen as fixed over the 18 years that it references but is subject to two further reviews at 6 yearly cycles and allows for adjustment. However, it is preferable that we set out an achievable and realistic plan at this stage, rather than having to make significant changes in the future.	The RBMP will include more information on the measures required to meet the objectives in each of the 26 LMAs. As part of the RBMP Implementation Programme actions plans will be developed for each LMA in liaison with stakeholder groups active in those areas.
dRBMPCon58/1	Angela Halpeny	NIWater	NI Water does agree with the objectives set, in particular the cost-benefit analysis approach, given that NI Water is a financially regulated company. While the aim is to provide cleaner and healthier waters, we cannot ignore the economic realities. Implementation of the WFD has already improved and will continue to improve the information on the water environment and how it is managed, enabling a balanced and cost-effective approach to water	The Department has engaged consultants to prepare a strategic impact assessment on costs and benefits of proposed new measures over and above basic measures that are required irrespective of WFD. The assessment will include the benefits to tourism. The strategic impact assessment will be included in the River Basin Management Plans to be published in December 2009. However it is recognised that further work will be required to capture the benefits of tourism at a	The strategic RIA will be published along with the RBMPs.



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			<p>protection and improvement that will not penalise the majority of water users.</p> <p>The level of ambition has been carefully set, whilst recognising that not all water bodies will achieve good ecological status (GES) by 2015, and so the timescale to achieve GES by 2027 is more realistic. Heavily modified water bodies have been acknowledged in the plans and it is accepted that they can no longer be restored to their original condition.</p>	local level.	
dRBMPCon58/2	Angela Halpeny	NIWater	<p>The plans indicate that NI Water investment is the single most important improvement programme for Northern Ireland's waters. In this context, NI Water's capability of implementing capital schemes is dependent on the PC10 determination. Should the level of funding be less than originally indicated, which is likely, the draft list of schemes will have to be cut, thus potentially reducing the overall level of improvement in water quality, particularly in water bodies where NI Water's input is the main factor. The funding available to other sectors, for example agriculture, may not be at the level originally suggested, so together with the NI water position, there will be a severe pressure on the target. NI Water therefore considers that the aspirations of achieving 72% GES by 2015 to be over optimistic, compared to the targets set by the other UK countries.</p>	<p>The objectives have been looked at in relation to the proposed capital expenditure in PC10 and this has informed the objectives in the RBMP. However, the objectives for the RBMP can not be constrained by costs unless it is demonstrated they are disproportionately expensive compared to the environmental benefit and we do not consider this to be the case. The objectives have been renewed using the 2009 status classification data and will be presented in the RBMP. The updated level of ambition is 64%.</p>	The objectives have been updated.

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dRBMPCon62/1	M.Dillon (sec)	Clady and District Angling club	The Objectives are not good enough and need to be greatly enhanced	The level of ambition set out in the plan is higher than in the rest of the UK and we have sought to establish objectives that are challenging but are realistic in terms of achievement. The initial set objectives, using the rules established in the plan, have been reviewed by expert working groups to consider if higher objectives could be achieved within the life of the plan or whether the objectives are unrealistic given the current knowledge and understanding of the pressures on individual water bodies and the effectiveness of the available measures. The costs of achieving the objectives are also a consideration, this will be reviewed during the life of the plan and new legislative measures will be subject to a regulatory impact assessment in relation to their cost effectiveness.	The RBMP will include more information on the measures required to meet the objectives in each of the 26 LMAs. As part of the RBMP Implementation Programme actions plans will be developed for each LMA in liaison with stakeholder groups active in those areas.
dRBMPCon62/2	M.Dillon (sec)	Clady and District Angling club	Greatly enhanced objectives will be a stimulus for co-operation and morale	Comment is noted. NIEA actively seeks to engage with all stakeholders interested in the water environment through nine Catchment Stakeholder Groups (CSG) which meet biannually. The CSGs consist of representatives from Government Departments/ Agencies, angling groups, NGOs, landowners, and members of the public, that work together to address local water management issues. The CSG meetings enable stakeholders to engage with the statutory authorities in order to influence decisions on how the Water Framework Directive is	The RBMP will include more information on the measures required to meet the objectives in each of the 26 LMAs. As part of the RBMP Implementation Programme

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				implemented in Northern Ireland. The group share local knowledge and expertise so as to address and resolve local water management issues. More information is available at <a href="http://www.ni-environment.gov.uk/water-home/wfd/public_partic_3/catchment_stakeholder_groups.htm">http://www.ni-environment.gov.uk/water-home/wfd/public_partic_3/catchment_stakeholder_groups.htm</a>	actions plans will be developed for each LMA in liaison with stakeholder groups active in those areas.
dRBMPCon64/1	Laverne Bell	QPANI	QPANI agree with the objectives and level of improvement set for Northern Ireland's water environment. Though crucial to say, aspirations will not be reached without significant and immediate financial investment by Northern Ireland PLC. Overall the level of detail in the plans is broad-spectrum given the preparation time pre-consultation.	Comment is noted. The Department is preparing a bid for the next funding round to support the work of delivering the requirements of the Water Framework Directive. We are also seeking to promote the establishment of River Trusts that may enable the draw down of independent sources of finance to support NGO initiatives, that may assist in delivering the objectives of the Plan.	A new measure on the establishment of River Trusts has been included in the RBMPs
dRBMPCon65/1	Clair Cockerill	WWF NI	WWF-NI believes that ambitions should be higher in order to be consistent with the spirit of the Water Framework Directive (WFD) and should clearly set out how the WFD will be achieved at individual water body and River Basin District level. The River Basin Management Plans must provide a clear route map to achieving WFD targets at local level.	The level of ambition set out in the plan is higher than in the rest of the UK and we have sought to establish objectives that are challenging but are realistic in terms of achievement. The initial set objectives, using the rules established in the plan, have been reviewed by expert working groups to consider if higher objectives could be achieved within the life of the plan or whether the objectives are unrealistic given the current knowledge and understanding of the pressures on individual water bodies and the effectiveness of the available measures. The costs of achieving the objectives are also a consideration, this will be reviewed during the life of the plan and new legislative measures will be subject to a regulatory impact assessment in relation to their cost effectiveness.	The RBMP will include more information on the measures required to meet the objectives in each of the 26 LMAs. As part of the RBMP Implementation Programme actions plans will be developed for each LMA in

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				<p>NIEA has subdivided the three River Basin Districts onto 26 Local Management Areas (LMAs) , which are based on sub basin catchments. Details of these areas were included as part of the supporting documentation for the consultation on the draft plans. The LMAs are being used as the level at which measures will be set and it is planned to develop action plans to implement the RBMPs in these areas. The action plans will be implemented on a three year rolling programme to allow resources to be targeted</p>	<p>liaison with stakeholder groups active in those areas.</p>
dRBMPCon65/2	Claire Cockrill	WWF NI	<p>The current suggestion to raise quality by one level between now and 2015 (e.g. from poor to moderate or from moderate to good) is not in keeping with the primary objective of WFD which states that all water bodies should have reached 'good' status by 2015. NIEA should have a target of Good Ecological Status (GES) by 2015 that demonstrates commitment to a phased approach.</p>	<p>The Water Framework Directive establishes the primary aim of achieving good ecological status in all water bodies by 2015 but allows for a phased achievement of the objectives over a longer period of time providing certain conditions apply. This requires that there is no further deterioration in the status of the water body and that improvements cannot reasonably be met within the timescale, due to reasons of technical infeasibility or it would be disproportionately expensive or natural conditions would not allow ecological recovery within that timescale. Where these conditions apply the Directive allows for an extended deadline to be set. NIEA will be setting out for each water body where an extended deadline applies the reason for that extension in the RBMP.</p>	<p>Additional information on the reasons for setting alternative objectives through the use of extended deadlines is now included.</p>

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dRBMPCon66/4	Andrew McDowell	National Trust	We do not agree with the objectives and levels of improvement set by the draft plans. We have significant concerns at the way in which the objectives and levels have been reached. Notwithstanding these concerns, we believe that the resulting objectives in themselves lack sufficient ambition to fulfill the aims of the RBMP process.	The level of ambition set out in the plan is higher than in the rest of the UK and we have sought to establish objectives that are challenging but are realistic in terms of achievement. The initial set objectives, using the rules established in the plan, have been reviewed by expert working groups to consider if higher objectives could be achieved within the life of the plan or whether the objectives are unrealistic given the current knowledge and understanding of the pressures on individual water bodies and the effectiveness of the available measures. The costs of achieving the objectives are also a consideration, this will be reviewed during the life of the plan and new legislative measures will be subject to a regulatory impact assessment in relation to their cost effectiveness.	The objectives have been updated.
dRBMPCon66/5	Andrew McDowell	National Trust	The principle that 'each water body should be improved by at least one class in each six-year cycle' (with the exception of 'poor' designations by 2015) is described as ambitious and realistic. Yet the draft plans do not provide evidence to back this claim.	The level of ambition set out in the plan is higher than in the rest of the UK and we have sought to establish objectives that are challenging but are realistic in terms of achievement. The initial set objectives, using the rules established in the plan, have been reviewed by expert working groups to consider if higher objectives could be achieved within the life of the plan or whether the objectives are unrealistic given the current knowledge and understanding of the pressures on individual water bodies and the effectiveness of the available measures. The costs of achieving the objectives are also a consideration, this will be reviewed during the life of the plan and new legislative measures will be subject to a regulatory impact assessment in relation to their cost effectiveness.	The RBMP will include more information on the measures required to meet the objectives in each of the 26 LMAs. As part of the RBMP Implementation Programme actions plans will be developed for each LMA in

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					liaison with stakeholder groups active in those areas.
dRBMPC on68/1	Patrick Case ment	CNCC	However, whilst recognising that the draft Plans are work in progress, there are significant gaps in the information available which make it difficult to judge how effective they will be in achieving 'Good' status for all water bodies by 2015.	NIEA has subdivided the three River Basin Districts onto 26 Local Management Areas (LMAs) , which are based on sub basin catchments. Details of these areas were included as part of the supporting documentation for the consultation on the draft plans. The LMAs are being used as the level at which measures will be set and it is planned to develop action plans to implement the RBMPs in these areas. The action plans will be implemented on a three year rolling programme to allow resources to be targeted.	The RBMP will include more information on the measures required to meet the objectives in each of the 26 LMAs.
dRBMPC on68/7	Patrick Case ment	CNCC	The objective to achieve 'Good' status for all water bodies by 2015 is plainly unachievable, given the gap between current status and the target and available resources. It would be easy to take the figures at face value and say that a target of 414 out of 601 surface water bodies at 'Good' status by 2015 lacks ambition, but lack of detailed information makes it impossible to judge how the decisions to prioritise improvements were made.	NIEA has subdivided the three River Basin Districts onto 26 Local Management Areas (LMAs) , which are based on sub basin catchments. Details of these areas were included as part of the supporting documentation for the consultation on the draft plans. The LMAs are being used as the level at which measures will be set and it is planned to develop action plans to implement the RBMPs in these areas. The action plans will be implemented on a three year rolling programme to allow resources to be targeted.	The RBMP will include more information on the measures required to meet the objectives in each of the 26 LMAs.

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dRBMPCon69/1	Stuart Wighman	DRD WPD	<p>However, I have concerns over the ambitious levels of environmental improvement set within the draft RBMPs for 2015. The finalised PC10 scheme lists should inform the programme of measures and level of ambition in the final RBMPs to ensure we are joined up. It is also recognised that NI Water is not solely responsible for delivery of the RBMP targets and each sector must make appropriate contributions to ensure that water quality objectives are realistic and can be met in a sustainable way.</p>	<p>The objectives have been looked at in relation to the proposed capital expenditure in PC10 and this has informed the objectives in the RBMP taking into account the Programme of Measures. However we are committed to delivering good status or good ecological potential as soon as feasible and the objectives should demonstrate ambition but be realistic. This is a difficult balance to strike and as you pointed out it will need contribution across a number of sectors.</p>	<p>The RBMP will include more information on the measures required to meet the objectives in each of the 26 LMAs. As part of the RBMP Implementation Programme actions plans will be developed for each LMA in liaison with stakeholder groups active in those areas</p>
dRBMPCon69/3	Stuart Wighman	DRD WPD	<p>DRD realises that the plans must contain aspirational targets and positive objectives although it seems that the targets for 2015 are very ambitious and slightly out of step with the levels set by other member states. More realistic levels of ambition may be appropriate.</p> <p>If aspirations were better staged it would allow:-</p> <ul style="list-style-type: none"> <li>(i) a more even funding profile (particularly relevant in the current economic climate);</li> <li>(ii) more time for a catchment based approach to be adopted;</li> <li>(iii) more time for the development of sustainable</li> </ul>	<p>The Department is committed in delivering good status or good ecological potential as soon as feasible and the objectives should demonstrate ambition but be realistic. NIEA has subdivided the three River Basin Districts onto 26 Local Management Areas (LMAs) , which are based on sub basin catchments. Details of these areas were included as part of the supporting documentation for the consultation on the draft plans. The LMAs are being used as the level at which measures will be set and it is planned to develop action plans to implement the RBMPs in these areas. The action</p>	<p>The RBMP will include more information on the measures required to meet the objectives in each of the 26 LMAs. As part of the RBMP Implementation Programme</p>

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			solutions as opposed to current traditional solutions to help achieve good ecological status. As the plans are further developed, DRD would hope to see the proposed levels of improvement linked to planned measures to ensure that water quality objectives are set to be both achievable and sustainable.	plans will be implemented on a three year rolling programme to allow resources to be targeted. The levels of ambition vary widely across the member states ranging from approximately 5% to 95%.	actions plans will be developed for each LMA in liaison with stakeholder groups active in those areas.
dRBMPC on72/2	Aileen Lawson	UFU	The UFU has concerns that setting over ambitious objectives could cause problems for agriculture and other sectors in the future by forcing them to adopt more stringent measures which may have little impact on water quality without fully considering the background levels of phosphorus and giving adequate time for this to decline.	The objectives for water bodies that are adversely affected by phosphorus have been set in relation to the level of phosphorus reduction that is required to deliver good status and in many cases an extended deadline beyond 2015 has been set, to allow for background levels to drop over time. Further investigation into the effectiveness of existing and supplementary measures to reduce phosphorus to deliver the objectives in the plan will help to inform the review of the objectives for the next cycle.	The objectives have been updated.
dRBMPC on73/1	Seamus O'Connell	IBEC	IBEC supports the move to the River Basin District basis of planning, provision and operation of water and wastewater infrastructure and services. Irelands eight River Basins provide logical geographic structures for the planning and provision of water services on a national scale, which will maximise potential economies of scale and deliver greater efficiencies and reduced costs for water users. A regional approach would further reduce duplication, inefficiencies and cost in the delivery of water and wastewater services. River basin planning provides an excellent opportunity to plan a long-term programme of water improvement.	There is currently good cooperation on a North South basis on technical issues including the monitoring of shared water bodies. This is coordinated through the North South Technical Advisory Group. The objectives for the shared water bodies within the North Western and Neagh Bann International Basin Districts (IRBDs) have been agreed on a North South basis and were published as part of the Tier 1 documents for each IRBD. The same approach has been followed for the RBMPs to be published in December 2009. The NS Ministerial Council continue to agree approaches to environmental protection with regard to pollution, water quality management and waste	An updated Tier 1 document will be published for each IRBD. In addition a North South Implementation Group comprising NIEA, Donegal County Council and Monaghan County will be established to



Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
				management in a cross-border context.	support the implementation of measures in the shared water bodies. The Group will initially meet on a quarterly basis, with the start up meeting planned for Spring 2010.
dRBMPC on74/1	Conor Goultsbury	IBEC	IBEC supports the move to the River Basin District basis of planning, provision and operation of water and wastewater infrastructure and services. Irelands eight River Basins provide logical geographic structures for the planning and provision of water services on a national scale, which will maximise potential economies of scale and deliver greater efficiencies and reduced costs for water users. A regional approach would further reduce duplication, inefficiencies and cost in the delivery of water and wastewater services. River basin planning provides an excellent opportunity to plan a long-term programme of water improvement.	There is currently good cooperation on a North South basis on technical issues including the monitoring of shared water bodies. This is coordinated through the North South Technical Advisory Group. The objectives for the shared water bodies within the North Western and Neagh Bann International Basin Districts (IRBDs) have been agreed on a North South basis and were published as part of the Tier 1 documents for each IRBD. The same approach has been followed for the RBMPs to be published in December 2009. The NS Ministerial Council continue to agree approaches to environmental protection with regard to pollution, water quality management and waste management in a cross-border context.	An updated Tier 1 document will be published for each IRBD. In addition a North South Implementation Group comprising NIEA, Donegal County Council and Monaghan County will be established to support the implementation of measures in the shared water bodies. The Group will

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					initially meet on a quarterly basis, with the start up meeting planned for Spring 2010.
dRBMPC on80/1	P.Mc Cruden	Rivers Agency	In broad terms Rivers Agency agrees with the objectives and level of improvement set for Northern Ireland's water environment from a quality aspect	Comment is noted. The objectives have been reviewed using the 2009 status classification data and will be presented in the RBMP.	The objectives have been updated.
dRBMPC on81/1	John Anderson	FoLL	Yes to objectives as detailed but serious reservations as to achievability and timescales. Must be accompanied by a firm commitment from the NI Assembly that necessary resources will be made available and that the various Responsible Authorities will give an equally firm commitment to work together in achieving the objectives. This is, of course, a reference to the perennial problem of lack of joined up government, policy clash and ill-defined or dual remit.	An inter - departmental bid has been prepared to cover the period April 2010 - March 2013. Any proposals for additional expenditure will be the subject of bids through the normal Budget process and in-year monitoring rounds. These costs have been included in a strategic Regulatory Impact Assessment.	The strategic RIA will be published along with the RBMP.
dRBMPC on83/2	Mark Henderson	Coleraine Anglers Association	The extended deadlines for Good Status must be improved. There is a lack of basic information; for any given waterway, there is no list of the specific pollution inputs, and no specific plan to deal with them. .	NIEA has subdivided the three River Basin Districts onto 26 Local Management Areas (LMAs) , which are based on sub basin catchments. Details of these areas were included as part of the supporting documentation for the consultation on the draft plans. The LMAs are being used as the level at which measures will be set and it is planned to	The RBMP will include more information on the measures required to meet the objectives in

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				develop action plans to implement the RBMPs in these areas. The action plans will be implemented on a three year rolling programme to allow resources to be targeted.	each of the 26 LMAs. As part of the RBMP Implementation Programme actions plans will be developed for each LMA in liaison with stakeholder groups active in those areas.
dRBMPCon83/5	Mark Henderson	Coleraine Anglers Association	<p>Although there are three separate Draft RBMPs, these comments relate to all three as the issues identified are common to all plans. The following comments are made in the knowledge that in Northern Ireland more than 40% of our rivers fail to meet the “good” standard of biological river quality, and the water quality of our lakes continues to deteriorate. It is therefore reasonable to suggest that existing strategies and programmes are not working as well as needed. Unless there are significant improvements to the Plans we feel Northern Ireland is going to fall short of the targets of the Water Framework Directive.</p> <p>Overall, we are concerned with the extremely low level of ambition in the first River Basin Management Plan (RBMP) cycle. We do not feel this demonstrates a sufficient commitment to achieving ‘good ecological status’ (GES) in all</p>	The Water Framework Directive has introduced a more comprehensive water quality classification system than previously employed in Northern Ireland and provides a clear driver to improve the biological water quality. It is accepted therefore that this will require new approaches to delivering the additional requirements, that the Directive introduces. The Programme of Measures seeks to capture a number of new planned and additional measures that will assist in delivering improved water quality and the consultation with stakeholders has sought to inform the development of the programme. The Directive also provides a clear driver to address a variety of pressures within the environment that impacts upon water quality and this will assist in seeking to implement the strategies and programmes that are set out in the RBMP to address any adverse trends and improve water quality.	The RBMP will include more information on the measures required to meet the objectives in each of the 26 LMAs. As part of the RBMP Implementation Programme actions plans will be developed for each LMA in liaison with stakeholder groups active in those areas.

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			water bodies. As the Plans stand at present, we do not feel they form part of a credible strategy for WFD delivery over the next eighteen years.	The level of ambition set out in the plan is higher than in the rest of the UK and we have sought to establish objectives that are challenging but are realistic in terms of achievement. The initial objectives set using the rules established in the plan, were subject to review by expert working groups to consider if higher objectives could be achieved within the life of the plan or whether the objectives are unrealistic given the current knowledge and understanding of the pressures on individual waterbodies and the effectiveness of the available measures. The costs of achieving the objectives are also a consideration, these will be reviewed during the life of the plan, as will the objectives and the programme of measures. . The RBMP covers the period 2009 – 2015 and should not be seen as fixed over the 18 years that it references but is subject to two further reviews at 6 yearly cycles and allows for adjustment. However, it is preferable that we set out an achievable and realistic plan at this stage, rather than having to make significant changes in the future.	
dRBMPCon83/9	Mark Henderson	Coleraine Anglers Association	<p>Ques 1 The Objectives are not good enough and need to be greatly enhanced.</p> <p>Ques 2 Most of the pressures have been identified, but it is resolute action to address these which is missing.</p> <p>Ques 3 no comment</p> <p>Ques 4 no comment</p> <p>Ques 5 no comment</p> <p>Ques 6 Greatly enhanced Objectives will be a</p>	<p>See Comments above.</p> <p>NIEA has subdivided the three River Basin Districts onto 26 Local Management Areas (LMAs) , which are based on sub basin catchments. Details of these areas were included as part of the supporting documentation for the consultation on the draft plans. The LMAs are being used as the level at which measures will be set and it is planned to develop action plans to implement the RBMPs in</p>	The RBMP will include more information on the measures required to meet the objectives in each of the 26 LMAs. As part

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			stimulus for co-operation and morale.	these areas. The action plans will be implemented on a three year rolling programme to allow resources to be targeted	of the RBMP Implementation Programme actions plans will be developed for each LMA in liaison with stakeholder groups active in those areas.
dRBMPC on85/1	Sean Convery	FWAG NI	The Farming and Wildlife Advisory Group recognizes that this is a very significant task and that not all expectations will be fulfilled.	Comment is noted. The objectives have been reviewed using the 2009 status classification data and will be presented in the RBMP.	The objectives have been updated
dRBMPC on86/2	David Howard	Bangor Angling Club	Major Issues 1 The extended deadlines for Good Status must be improved. 2 There is a lack of basic information; for any given waterway, there is no list of the specific pollution inputs, and no specific plan to deal with them. .	The Department is committed in delivering good status or good ecological potential as soon as feasible and the objectives should demonstrate ambition but be realistic. NIEA has subdivided the three River Basin Districts onto 26 Local Management Areas (LMAs) , which are based on sub basin catchments. Details of these areas were included as part of the supporting documentation for the consultation on the draft plans. The LMAs are being used as the level at which measures will be set and it is planned to develop action plans to implement the RBMPs in these areas. The action plans will be implemented on a three year rolling programme to allow resources to be targeted	The RBMP will include more information on the measures required to meet the objectives in each of the 26 LMAs. As part of the RBMP Implementation Programme actions plans will be developed for each LMA in

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					liaison with stakeholder groups active in those areas.
dRBMPCon86/5	David Howard	Bangor Angling Club	<p>Although there are three separate Draft RBMPs, these comments relate to all three as the issues identified are common to all plans. The following comments are made in the knowledge that in Northern Ireland more than 40% of our rivers fail to meet the “good” standard of biological river quality, and the water quality of our lakes continues to deteriorate. It is therefore reasonable to suggest that existing strategies and programmes are not working as well as needed. Unless there are significant improvements to the Plans we feel Northern Ireland is going to fall short of the targets of the Water Framework Directive.</p> <p>Overall, we are concerned with the extremely low level of ambition in the first River Basin Management Plan (RBMP) cycle. We do not feel this demonstrates a sufficient commitment to achieving ‘good ecological status’ (GES) in all water bodies. As the Plans stand at present, we do not feel they form part of a credible strategy for WFD delivery over the next eighteen years.</p>	<p>The Water Framework Directive has introduced a more comprehensive water quality classification system than previously employed in Northern Ireland and provides a clear driver to improve the biological water quality. It is accepted therefore that this will require new approaches to delivering the additional requirements, that the Directive introduces. The Programme of Measures seeks to capture a number of new and additional measures that will assist in delivering improved water quality and the consultation with stakeholders has sought to inform the development of the programme. The Directive also provides a clear driver to address a variety of pressures within the environment that impacts upon water quality and this will assist in seeking to implement the strategies and programmes that are set out in the RBMP to address any adverse trends and improve water quality.</p> <p>The level of ambition set out in the plan is higher than in the rest of the UK and we have sought to establish objectives that are challenging but are realistic in terms of achievement. The initial objectives set using the rules established in the plan, were subject to review by expert working groups to consider if higher objectives could be achieved within the life of the plan or whether the objectives are unrealistic given the current</p>	The RBMP will include more information on the measures required to meet the objectives in each of the 26 LMAs. As part of the RBMP Implementation Programme actions plans will be developed for each LMA in liaison with stakeholder groups active in those areas.

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				<p>knowledge and understanding of the pressures on individual waterbodies and the effectiveness of the available measures. The costs of achieving the objectives are also a consideration, these will be reviewed during the life of the plan, as will the objectives and the programme of measures. The RBMP covers the period 2009 – 2015 and should not be seen as fixed over the 18 years that it references but is subject to two further reviews at 6 yearly cycles and allows for adjustment. However, it is preferable that we set out an achievable and realistic plan at this stage, rather than having to make significant changes in the future.</p>	
dRBMPCon86/9	David Howard	Bangor Angling Club	<p>Ques 1 The Objectives are not good enough and need to be greatly enhanced.  Ques 2 Most of the pressures have been identified, but it is resolute action to address these which is missing.  Ques 3 no comment  Ques 4 no comment  Ques 5 no comment  Ques 6 Greatly enhanced Objectives will be a stimulus for co-operation and morale.</p>	See comment above.	The RBMP will include more information on the measures required to meet the objectives in each of the 26 LMAs. As part of the RBMP Implementation Programme actions plans will be developed for each LMA in liaison with

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					stakeholder groups active in those areas.
dRBMPCon90/4	Clerk to the Environment Committee & Committee for Regional Development	Committee for Regional Development and Environment Committee	Four organisations with commercial or business interests responded on this issue. Of these, three agreed with the objectives and level of importance set for Northern Ireland's water environment, however, one company was also concerned as to how Northern Ireland Water would reach its targets.	Northern Ireland water have a programme of improvements under the Price Control 2010 (PC10) that will deliver improvements up to 2013. The next 5 year business plan (PC18) will cover the period 2013 up until 2018 will take into account the objectives set out for 2015 and 2021. However, the objectives have been looked at in relation to the proposed capital expenditure in PC10 and this has informed the objectives in the RBMP. However, the objectives for the final plan can not be constrained by costs unless it is demonstrated they are disproportionately expensive compared to the environmental benefit and we do not consider this to be the case. The situation will also be informed by a Regulatory Impact Assessment which will be published with the final plan.	The objectives have been reviewed using the 2009 status classification data and will be presented in the RBMP. Additional information on the reasons for setting alternative objectives through the use of extended deadlines is now included in the RBMPs



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dRBMPCon93/1	CSG Meeting: Strangford and Lecale	CSG Meeting: Strangford and Lecale	What are the main reasons for <good? Direct to web map information. Wanted to know why 70% of water bodies not good, dispersed settlement patterns.	The objectives have been reviewed using the 2009 status classification data and will be presented in the RBMP. Additional information on the reasons for setting alternative objectives through the use of extended deadlines is now included in the RBMPs	Additional information is now included in the RBMPs on the elements monitored and those failing good status.
dRBMPCon93/5	CSG Meeting: Strangford and Lecale	CSG Meeting: Strangford and Lecale	NIW capital works programme. NIW, Rural Waste water, help and target/prioritisation. Targeting 20 small works. Local expertise may help identify one element to target to get a 'quick win'.	NIEA has subdivided the three River Basin Districts onto 26 Local Management Areas (LMAs) , which are based on sub basin catchments. Details of these areas were included as part of the supporting documentation for the consultation on the draft plans. The LMAs are being used as the level at which measures will be set and it is planned to develop action plans to implement the RBMPs in these areas. The action plans will be implemented on a three year rolling programme to allow resources to be targeted.	The RBMP will include more information on the measures required to meet the objectives in each of the 26 LMAs. As part of the RBMP Implementation Programme actions plans will be developed for each LMA in liaison with stakeholder groups active in those areas.

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dRBMPCon93/6	CSG Meeting: Strangford and Lecale	CSG Meeting: Strangford and Lecale	HMWB's – confusion on page 16 understanding concept. Name HMWB but then go on to define rivers. Quoile – HMWB's	A document detailing the designation and classification of each HWMB is being produced in support of the RBMPs.	A document will be published as part of the RBMP.
dRBMPCon94/1	CSG Meeting: Belfast Lough and Lagan	CSG Meeting: Belfast Lough and Lagan	Not ambitious enough - Information not clear - Not enough detail to comment - Don't stop if target reached	Comments noted. The level of ambition set out in the plan is higher than in the rest of the UK and we have sought to establish objectives that are challenging but are realistic in terms achievement. The initial set objectives, using the rules established in the plan, have been reviewed by expert working groups to consider if higher objectives could be achieved within the life of the plan or whether the objectives are unrealistic given the current knowledge and understanding of the pressures on individual waterbodies and the effectiveness of the available measures. NIEA has subdivided the three River Basin Districts onto 26 Local Management Areas (LMAs), which are based on sub basin catchments. Details of these areas were included as part of the supporting documentation for the consultation on the draft plans.	The RBMP will include more information on the measures required to meet the objectives in each of the 26 LMAs. As part of the RBMP Implementation Programme actions plans will be developed for each LMA in liaison with stakeholder groups active in those areas.
dRBMPCon94/3	CSG Meeting: Belfast	CSG Meeting: Belfast Lough	Paper version needed, web difficult	The summary RBMP will be published in hard copy. The interactive web viewer can be accessed at NIEA properties (including Water Management Unit, Lisburn) or at local libraries. The format and layout of the summary RBMP and website has	The format and layout of the summary RBMP and website has

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	Lough and Lagan	and Lagan		been updated.	been updated.
dRBMPCon95/1	CSG Meeting: Bush and Glens	CSG Meeting: Bush and Glens	<p>To meet objectives will require quite significant changes, with potentially high costs. Better to set realistic targets (economic targets).</p> <ul style="list-style-type: none"> <li>-Do we know enough about systems to know whether objectives are achievable? – tracking needed along the way.</li> <li>-People will look to NIEA to know whether objectives are achievable. (Regional comparisons given) Northern Ireland’s aspirations are very high.</li> <li>-Got to be realistic with objectives and targets.</li> <li>-Community will demand standards.</li> </ul>	<p>The objectives have been reviewed using the 2009 status classification data and will be presented in the RBMP.</p> <p>The level of ambition set out in the plan is higher than in the rest of the UK and we have sought to establish objectives that are challenging but are realistic in terms of achievement. The initial objectives set using the rules established in the plan, were subject to review by expert working groups to consider if higher objectives could be achieved within the life of the plan or whether the objectives are unrealistic given the current knowledge and understanding of the pressures on individual waterbodies and the effectiveness of the available measures. The costs of achieving the objectives are also a consideration, these will be reviewed during the life of the plan, as will the objectives and the programme of measures.</p> <p>The RBMP covers the period 2009 – 2015 and should not be seen as fixed over the 18 years that it references but is subject to two further reviews at 6 yearly cycles and allows for adjustment.</p> <p>However, it is preferable that we set out an achievable and realistic plan at this stage, rather than having to make significant changes in the future.</p>	Additional information on the reasons for setting alternative objectives through the use of extended deadlines is now included in the RBMPs.

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dRBMPC on97/1	CSG Meeting: Lower Neagh Bann	CSG Meeting: Lower Neagh Bann	Are the targets too high? Especially when compared to England, Scotland and Wales.	The level of ambition set out in the plan is higher than in the rest of the UK and we have sought to establish objectives that are challenging but are realistic in terms of achievement. The initial objectives set using the rules established in the plan, were subject to review by expert working groups to consider if higher objectives could be achieved within the life of the plan or whether the objectives are unrealistic given the current knowledge and understanding of the pressures on individual waterbodies and the effectiveness of the available measures. The costs of achieving the objectives are also a consideration, these will be reviewed during the life of the plan, as will the objectives and the programme of measures. The RBMP covers the period 2009 – 2015 and should not be seen as fixed over the 18 years that it references but is subject to two further reviews at 6 yearly cycles and allows for adjustment. However, it is preferable that we set out an achievable and realistic plan at this stage, rather than having to make significant changes in the future.	The objectives have been updated.
dRBMPC on97/2	CSG Meeting: Lower Neagh Bann	CSG Meeting: Lower Neagh Bann	Should socio-economic factors be taken into account? For example, salmon fishery areas, tourism etc.	The Department has engaged consultants to prepare a strategic impact assessment on costs and benefits of proposed new measures over and above basic measures that are required irrespective of WFD. The assessment will include the benefits of tourism. The strategic impact assessment will be included in the River Basin Management Plans to be published in December 2009. However it is recognised that further work will be required to capture the benefits of tourism at a	The strategic RIA will be published along with the RBMP.

Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
				local level.	
dRBMPC on97/3	CSG Meeting: Lower Neagh Bann	CSG Meeting: Lower Neagh Bann	Concerns of costs to reach targets. Costs – Developers should pay for sewage facilities required.	The Department has engaged consultants to prepare a strategic impact assessment on costs and benefits of proposed new measures over and above basic measures that are required irrespective of WFD. The assessment will include the benefits to tourism. The strategic impact assessment will be included in the River Basin Management Plans to be published in December 2009. However it is recognised that further work will be required to capture the benefits of tourism at a local level.	The strategic RIA will be published along with the RBMP.
dRBMPC on98/1	CSG Meeting: Carlingford and Mourne	CSG Meeting: Carlingford and Mourne	Will more resources be made available if it appears NIEA will be unable to meet targets within the timeline?-Need to look at monitoring action.	An inter - departmental bid has been prepared to cover the period April 2010 - March 2013. Any proposals for additional expenditure will be the subject of bids through the normal Budget process and in-year monitoring rounds. These costs have been included in a strategic Regulatory Impact Assessment.	The strategic RIA will be published along with the RBMP.

Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
dRBMPC on98/3	CSG Meeting: Carlingford and Mourne	CSG Meeting: Carlingford and Mourne	New legislation will be required in some cases e.g. morphology.	A review of the existing legislation relating to controls of hydromorphological impacts has been completed. This recommended the development of guidance to enhance the application of the existing legislation.	Section on Freshwater Morphology has been updated.
dRBMPC on98/4	CSG Meeting: Carlingford and Mourne	CSG Meeting: Carlingford and Mourne	Funding secured by other parties e.g. Northern Ireland Water (NIW), is key. Therefore NIW involved in developing dRBMPs.  -Agriculture also involved e.g. NVZs, cross compliance, Nitrate Action Programme (NAP) and Planning Area Plans (PAPs).	Comment is noted.	The Register of Plans and Programmes has been updated.
dRBMPC on98/5	CSG Meeting: Carlingford and Mourne	CSG Meeting: Carlingford and Mourne	Targets set during good economic weather. Will these in the current economic climate, with the reduced amount of money around, be realistic?	An inter - departmental bid has been prepared to cover the period April 2010 - March 2013. Any proposals for additional expenditure will be the subject of bids through the normal Budget process and in-year monitoring rounds. These costs have been included in a strategic Regulatory Impact Assessment.	The strategic RIA will be published along with the RBMP.
dRBMPC on100/2	CSG Meeting: Upper Foyle	CSG Meeting: Upper Foyle	Will sufficient resources be made available (to achieve the objectives that are set and put the proposed measures in place) ?	An inter - departmental bid has been prepared to cover the period April 2010 - March 2013. Any proposals for additional expenditure will be the subject of bids through the normal Budget process and in-year monitoring rounds. These costs have been included in a strategic Regulatory Impact Assessment.	The strategic RIA will be published along with the RBMP.

Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
dRBMPC on100/10	CSG Meeting: Upper Foyle	CSG Meeting: Upper Foyle	The objectives are unlikely to be achieved and in any case are not economically viable	The objectives have been reviewed using the 2009 status classification data and will be presented in the RBMP. Additional information on the reasons for setting alternative objectives through the use of extended deadlines is now included in the RBMP.	The objectives have been updated.
dRBMPC on100/12		CSG Meeting: Upper Foyle	Agree with objectives and levels set. Baselines on status need to be clear on when in time is relevant.	The objectives have been reviewed using the 2009 status classification data and will be presented in the RBMP. Additional information on the reasons for setting alternative objectives through the use of extended deadlines is now included in the RBMP.	The objectives have been updated.
dRBMPC on101/1	CSG Meeting: Erne and Melvin	CSG Meeting: Erne and Melvin	Reasonable objectives, but how likely are we to succeed? - What are the objectives for fish & pollan species?- Have we identified phosphorus loading? - Cross-border catchment. - Have the changes in agricultural processes led to a reduction in phosphorus in soil? - We should discourage chemical fertiliser use. If the cost of fertilisers decreases, then the use of these fertilisers will increase. - Does phosphorus removal at Enniskillen STW happen all year round?- Cannot judge if targets are realistic or not.	A number of the measures are targeted at reducing phosphorus loading.	Section on Agriculture has been updated and supplementary measures on P reduction included.

### 3.4 Most significant pressures affecting the water environment

#### 3.4.1 Planning and development

Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
dRBMPCon18/3	George Butler	NI Water	Development leading to flashier catchments and flooding,	The Rivers Agency maintain the hydrometric monitoring network within Northern Ireland and the water levels and flow data information is employed in flood estimation for flood alleviation. Rivers Agency's Strategic Flood Maps have been developed in co-operation with the Department of Environment to meet the requirements of its Planning Policy Statement 15 - Planning and Flood Risk. PPS 15 sets out the Department's planning policies to minimise flood risk to people, property and the environment. It adopts a precautionary approach to development decisions which takes account of climate change and is supportive of the wellbeing and safety of people. The Rivers agency document Strategic Flood Map – Rivers and Sea explains how predictive mapping techniques have been employed to take into account modeling predictions including sea levels – this work includes scenarios to 2030. <a href="http://www.riversagency.cymru.gov.uk/racolor.pdf">http://www.riversagency.cymru.gov.uk/racolor.pdf</a>	Section on Abstraction and flow regulation has been updated.



Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
dRBMPCon23/30	Clair e Cock erill	Freshw ater Task Force	<ul style="list-style-type: none"> <li>• Additional pressures to be included: Inefficient water use; Planning pressures; impacts of Economic climate; pressures from Canals; Climate Change</li> <li>• More information is required on local impact of pressures</li> </ul>	Points noted. This summary has been covered in detailed comments - please see Cost Effectiveness and Climate Change topics. NIEA has subdivided the three River Basin Districts onto 26 Local Management Areas (LMAs) , which are based on sub basin catchments. Details of these areas were included as part of the supporting documentation for the consultation on the draft plans. The LMAs are being used as the level at which measures will be set and it is planned to develop action plans to implement the RBMPs in these areas. The action plans will be implemented on a three year rolling programme to allow resources to be targeted.	Any changes required have been listed against relevant comments. The RBMP will include more information on the measures required to meet the objectives in each of the 26 LMAs. As part of the RBMP Implementation Programme actions plans will be developed for each LMA in liaison with stakeholder groups active in those areas.
dRBMPCon31/3	Colin McC abrey	Castler eagh Boroug h Council	Given points one and two above, there needs to be a clear definition of what physical development is within the context of the plan. Private development may not be welcome but restoration and regeneration relating to the river and the canal may be because of	The Water Framework Directive recognises that certain uses of the aquatic environment such as navigation, drinking-water supply and water regulation are important sustainable human development activities. In these circumstances the water bodies affected may be designated as	A document on heavily modified waterbodies to be provided as a supporting document to the

Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
			economic benefit.	artificial or heavily modified and the requirement is to ensure the water body must meet Good Ecological Potential. In practice this is taken to mean that all possible mitigation is in place, taking account of technical feasibility and disproportionate costs.	RBMP is being produced.
dRBMPC on55/22	Jim Haughey	Ulster Angling Federation	5.3.3 (Action) Planning Controls; Septic tank controls are not well co-ordinated at present - NIEA need to examine bringing consents, planning, building control, emptying, on to one register.	<p>NIEA has recently commissioned some work to examine the impacts of a dispersed population pattern on water quality and to inform proposals for future legislation, policies and procedures to address pollution related to wastewater treatment provision in rural areas. There is uncertainty about the impact of On-site Waste Water Treatment Systems (OWWTS's) on water quality for a number of reasons including:</p> <ul style="list-style-type: none"> <li>• lack of information about the location, number and condition of existing systems;</li> <li>• the difficulty of monitoring the effects of discharges from OWWTS's on surface and ground water quality;</li> <li>• lack of understanding about the relative importance of OWWTS's in relation to other pressures such as agriculture.</li> </ul> <p>It is expected that the work on the dispersed settlement pattern will help inform NIEA as to the way forward. The following actions have been agreed : Research to examine legislative requirements and responsibilities to identify best practice in relation to OWWTS; Improve existing controls, support updated guidance for new</p>	Supplementary measure included in the RBMPs.

Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
				<p>systems and to prioritise actions in areas with high concentrations of existing OWWTS; Investigate provision of main sewers or OWWTS maintenance programmes in priority areas (existing systems, large unsewered populations where water quality is threatened).</p> <p>In addition the responsibility for the issue and management processes associated with consent to discharge from septic tanks lies with NIEA.</p>	
dRBMPCon66/10	Andrew McDowell	National Trust	<p>We would like to see a number of additional pressures included for consideration in the main plans, including:</p> <ul style="list-style-type: none"> <li>o Infrastructural, urban and rural development all have implications for the water environment. For example, inappropriate domestic development in rural areas creates pressures and cumulative impacts around abstraction for private supply, septic tank failures and strain on smaller treatment works (of which Northern Ireland has a higher proportion than elsewhere in the UK).</li> <li>o Planning and development should be recognised as important pressures in the main plans, and where possible identified at the level of individual water bodies. In this context, it would not be appropriate (or possible) to try to incorporate information around individual planning proposals into the</li> </ul>	<p>It is accepted that "Planning and Development" are additional pressures on the aquatic environment. The Department is considering what further mechanisms are required to ensure the River Basin Management Plans are integrated into the overall planning process including the Strategic Development Strategy and Development Area Plans.</p>	<p>A more detailed link will be identified between the RBMPs and other plans and programmes included in the RBMPs. The reader is directed to the 'Register of Plans and Programmes', a supporting web based document, for further information.</p>

Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
			plans: however key areas of planning pressure are known, and should be included.		
dRBMPCon89/3	Fiona Wilson	Land and Resource Management Group NIEA	<p>LRM would like to suggest that provision of advice to Planning Service (PS) on planning applications regarding the development of land where point sources may be present, should be included as an important existing measure. This could be applicable to a number of 'key sectors' including 'urban development' and 'waste'.</p> <p>Under the Planning (Northern Ireland) Order 1991 "material planning considerations" would include the impacts that land affected by contamination may have on land use. Through a Service Level Agreement (SLA) with PS, NIEA provides advice on planning applications where there is a potential risk due to the land being affected by contamination. The approach recommended in such situations is that a suitable risk assessment is completed at the application stage and in the event that unacceptable risks are identified, a remediation strategy would need to be agreed. Any planning approval for such an</p>	Comment is noted.	Section on and Urban Development & Waste have been updated to reflect this comment.

Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
			application should be conditioned to ensure that the remediation work is implemented and verified, so that the new development will be "suitable for use".		
dRBMPCon94/4	CSG Meeting: Belfast Lough and Lagan	CSG Meeting: Belfast Lough and Lagan	Planning development not included - Planning legislation not referenced - Consenting Policy? - Economic Pressures	It is accepted that "Planning and Development" are additional pressures on the aquatic environment. The Department is considering what further mechanisms are required to ensure the River Basin Management Plans are integrated into the overall planning process including the Strategic Development Strategy and Development Area Plans	Section on Abstraction and flow regulation has been updated.  Section on Urban development has been updated.

### 3.4.2 Recreation and Tourism

Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
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Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
dRBMPC on26/8	Cathy Burns	Lagan Canal Restoration Trust	Overall the LCRT would like to note that the tourism value and interests of the river and Lough Neagh has not been considered.	The Department has engaged consultants to prepare a strategic impact assessment on costs and benefits of proposed new measures over and above basic measures that are required irrespective of WFD. The assessment will include the benefits of tourism. The strategic impact assessment will be included in the River Basin Management Plans to be published in December 2009. However it is recognised that further work will be required to capture the benefits of tourism at a local level.	A strategic regulatory impact assessment on the costs and benefits of new measures will be included in the RBMPs
dRBMPC on31/1	Colin McCabrey	Castlerough Borough Council	The importance of NI's Tourism and Recreation Sector needs an increased significance within the plan, in particular, water based recreation and leisure activities along tow paths and walkways. The view of the council is that the economic impact of these projects warrants and flexible approach to physical development along the river to be considered on a project by project basis.	The Department has engaged consultants to prepare a strategic impact assessment on costs and benefits of proposed new measures over and above basic measures that are required irrespective of WFD. The assessment will include the benefits to tourism. The strategic impact assessment will be included in the River Basin Management Plans to be published in December 2009. However it is recognised that further work will be required to capture the benefits of tourism at a local level.	A strategic regulatory impact assessment on the costs and benefits of new measures will be included in the RBMPs
dRBMPC on51/7	Suzanne Lutton	Lisburn City Council	Overall Lisburn City Council would like to note that the tourism value and interests of the river have not been considered. There is a lack of consideration of specific recreation and leisure use of River Lagan.	The Department has engaged consultants to prepare a strategic impact assessment on costs and benefits of proposed new measures over and above basic measures that are required irrespective of WFD. The assessment will include the benefits of tourism. The strategic impact assessment will be included in the River Basin Management Plans to be published in December	A strategic regulatory impact assessment on the costs and benefits of new measures will be included in

Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
				2009. However it is recognised that further work will be required to capture the benefits of tourism at a local level.	the RBMPs
dRBMPCon55/9	Jim Haughey	Ulster Angling Federation	It is a somewhat Freudian slip that there is a significant omission in this clause, in that the sectors of tourism and angling are missing. It is instructive that the sectors included are those responsible for the lion's share of pollution of the resource, supporting the suspicion that the strategy of the WFD implementation in NI is mainly concerned with accommodating polluters rather than protecting the resource. In this respect it coincides with the draft "Revised Enforcement & Prosecution Policy 2009", representing a retreat from robust enforcement. In carrying out economic assessments, what economic value has been placed on clean water, and the value of tourism and angling? It is suspected that little or insufficient value has been placed on these, skewing the results.	The Department has engaged consultants to prepare a strategic impact assessment on costs and benefits of proposed new measures over and above basic measures that are required irrespective of WFD. The assessment will include the benefits of tourism and angling. The strategic impact assessment will be included in the River Basin Management Plans to be published in December 2009. However it is recognised that further work will be required to capture these benefits at a local level.	A strategic regulatory impact assessment on the costs and benefits of new measures will be included in the RBMPs

Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
dRBMPC on68/23	Patrick Case ment	CNCC	In considering the Gross Added Value, angling and tourism would seem to have been omitted and should be included. The PricewaterhouseCoopers Report of July 2007 for DCAL on the social and economic value of angling in NI states that all forms of angling in NI support some 780 full time equivalent jobs, and is worth some £40m p.a. to the NI economy, mostly from game angling. The Summary Report (March 2005) of the economic analysis required by WFD Article 5 makes no mention of these factors and seems somewhat dated. It is unclear whether this report will be updated, but accurate data is necessary for prioritising investment.	The Department has engaged consultants to prepare a strategic impact assessment on costs and benefits of proposed new measures over and above basic measures that are required irrespective of WFD. The assessment will include the benefits of tourism and angling. The strategic impact assessment will be included in the River Basin Management Plans to be published in December 2009. However it is recognised that further work will be required to capture these benefits at a local level.	A strategic regulatory impact assessment on the costs and benefits of new measures will be included in the RBMPs
dRBMPC on90/15	Clerk to the Environmental Committee & Committee for Regional Developm	Committee for Regional Development and Environment Committee	For the organisation with an interest in the leisure and tourism sector, the most significant pressures, in terms of physical inputs, on the water environment have been identified, however the view was expressed that water users' concerns were not identified and reflected in the Plans as much as it would like.	Comment is noted. It is recognised that further work could be done to improve on getting input from water users. The Department sought to do this during both the preparation of the plans and throughout the consultation by engaging with stakeholders and with the public. Prior to the production of the draft plans a series of 9 public evening meetings were held across Northern Ireland. These were attended by over 300 people. 9 local catchment stakeholder groups (CSGs) were formed subsequently, 3 per river basin, and NIEA arrange for these to meet twice yearly. During the draft plans consultation phase each CSG held a meeting dedicated to considering the drafts. And 6 public participation information day	As part of the RBMP Implementation Programme actions plans will be developed for each LMA in liaison with stakeholder groups active in those areas.



Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
	ent			consultation events were held at key locations across Northern Ireland. Although these were advertised widely in the main and local newspapers they were not very well attended by the public.	
dRBMPCon90/50	Clerk to the Environment Committee & Committee for Regional Development	Committee for Regional Development and Environment Committee	The organisation with an interest in the leisure and tourism sector saw the challenge of attracting more users if the RBMPs are too restrictive and suggested that the RBMPs can adjust to new circumstances e.g. more boat users in good weather etc.	The plans operate on a six year cycle and as such it is envisaged that changes can be made to the 2nd and 3rd cycle plans in the light of experience gained over the 1st cycle.	The chapter on implementation will explain this in more detail in the plans.
dRBMPCon92/2	Rosemary Mulholland	Craigavon Borough Council	There are three issues of concern which appear to have been omitted from the Plan: - Secondly, the potential problems caused by boat wash. Some areas have speed limits to minimise the risk of damage by wash, but most areas are unregulated and erosion of banks and the resulting siltation can occur. Council would recommend that this matter is given further consideration.	Waterways Ireland continue to develop and enforce bye-laws on all its navigations incorporating the principals of the WFD particularly with regard to speed restrictions and the management of pump out facilities where appropriate. Waterways Ireland has drafted new Bye-laws for all seven navigations under its jurisdictional remit. These are due to issue for public consultation imminently and will thereafter	Section on Freshwater Morphology has been updated.

Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
				be subject to change and ratification by the two government departments and the North South Ministerial Council.	

### 3.4.3 Waste

Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
dRBMPCon11/5	Keady District Angling Club	Keady District Angling Club	Litter - the lakes in the Keady area are bad, signage and bins would help. Legislation needs to make clear who actually is responsible for cleaning up litter and the penalties for do so	Comment is noted. The Litter (NI) Order 1994 places a duty on District Councils to keep land clear of litter. The Order contains powers designed to help DCs deal with litter problems. For example, a fixed penalty fine of £50 can be imposed on offenders; for more serious offences, much higher fines can be imposed on conviction through the courts.	Section on Waste has been updated.

Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
dRBMPC on89/2	Fiona Wilson	Land and Resource Management Group NIEA	LRM would like to highlight that, while landfills, quarries, mines and contaminated land are identified as significant pressures (P38), the potential risk from contaminated land as a source of diffuse and point pollution to surface and groundwater is not discussed in any of the 'key sector' tables in Section 5	Comment is noted.	Section on Waste has been updated.
dRBMPC on89/4	Fiona Wilson	Land and Resource Management Group NIEA	LRM would like to suggest that the impact of the forthcoming Environmental Liability (Prevention and Remediation) Regulations (Northern Ireland) (implementing Directive 2004/35/EC on environmental liability with regard to the prevention and remedying of environmental damage) and the potential impact of the Soil Framework Directive are considered and discussed.	Comment is noted.	Section on Waste will be updated to reflect this comment.
dRBMPC on89/8	Fiona Wilson	Land and Resource Management Group NIEA	Page 82 Section 5.7.1 and 5.7.2 As well as landfill leachate, contaminated land was identified as a significant pressure on Page 38. LRM would suggest, therefore, that contaminated land should also be discussed in Section 5.7.1 and its potential environmental impacts considered in Section 5.7.2. LRM would be happy to provide some wording, if required	Comment is noted.	Section on Waste has been updated.

Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
dRBMPCon89/9	Fiona Wilson	Land and Resource Management Group NIEA	<p>Page 83 Section 5.7.3 – The Waste and Contaminated Land (Northern Ireland) Order 1997</p> <p>A reference to the Regulations pending under Part III of the Order might be appropriate here.</p>	Comment is noted.	Section on Waste has been updated.
dRBMPCon89/10	Fiona Wilson	Land and Resource Management Group NIEA	<p>Page 85 Section 5.7.5 c) – Contaminated land regime</p> <p>LRM would like to suggest that as the comments about closure of sites using PPC permits and Waste Management Licences concern current actions, they should be moved and combined with the paragraph on PPC Regulations on P83. A suggested rewording of the remainder of the paragraph would be as follows, however LRM would be happy to discuss alternative wordings with the RBMP team:</p> <p>Contamination can occur through a wide range of circumstances and is commonly found, for example, on previous industrial sites such as factories and petrol filling stations where spillages of materials may have occurred over time. There are, therefore, sites with possible historical contamination which are not currently subject to effective regulatory control. To address this issue, and provide measures to cover the inspection and remediation of</p>	Comment is noted.	Section on Waste has been updated.

Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
			contaminated land, it is proposed that a Contaminated Land regime is brought into force. The provisions for a Northern Ireland contaminated land regime are contained within Part III of the Waste and Contaminated Land Order (NI) 1997 – the implementation timetable of which has yet to be confirmed. Under this regime, Remediation Notices could be served on appropriate persons listing the measures required to remediate the land to a condition that is “suitable for use”. A register available for public inspection, detailing contaminated land sites which had been the subject of a Notice served, would also be made available.		
dRBMPC on89/11	Fiona Wilson	Land and Resource Management Group NIEA	Page 87 Section 5.7 Summary of existing actions Under the key sector ‘waste - improvement required’, wording such as: ‘reduction in discharges / impacts from waste disposal and contaminated land’ might be a more appropriate objective for the WFD Programme of Measures, rather than the current wording of ‘reduction in organic waste’.	Comment is noted.	Section on Waste has been updated.
dRBMPC on92/3	Rosemary Mulholland	Craigavon Borough Council	Finally, infilling of wetlands has a dramatic effect on their hydrology, ecology and flood mitigation properties. This is especially seen in the low lying wetlands of the south Lough Neagh area. Infilling can be carried out for three main reasons: as a precursor to development of the	For sites within Lough Neagh ASSI, infilling would require consent or planning permission. Both these consents and NIEA responses to Planning Service in relation to planning applications are assessed for their potential to impact designated ASSI or SPA site selection features.	Section on Waste has been updated.  Section on Freshwater

Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
			site, to improve the land for agriculture and to dispose of large quantities of inert material such as soil and rock.	<p>For sites outside the ASSI, planning permission or waste legislation may be required, and decision to grant would be affected by policies such as biodiversity strategies.</p> <p>Landfill activity is regulated through existing legislation. It is also a policy in Planning Policy Statement 11 - Planning and Waste Management that '...the development will not have an unacceptable adverse impact on nature conservation...'</p> <p>Recognising the complexity of regulation appropriate guidance to supplement legislation will be developed to aid the regulation of physical modifications to water bodies and put in place by December 2010, to ensure compliance with WFD requirements.</p>	Morphology has been updated.
dRBMPC on93/17	CSG Meeting: Strangford and Lecale	CSG Meeting: Strangford and Lecale	3.7 - 5.7 Illegal element – Illegal dumping, diesel laundering, - police involvement regarding environmental crime, more detail in dRBMP's.	Comment is noted.	Section on Waste has been updated.

### 3.4.4 Septic Tanks

Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
dRBMPC on11/14	Keady District Angling Club	Keady District Angling Club	Septic Tanks - research indicates approx 130,000 septic tanks in NI. Research shows the one quarter to one third do not function properly which leads to contaminants leaking into our waterways. Tougher legislation and inspection of all tanks on a regular and ongoing basis needs to be brought into NI.	<p>NIEA has recently commissioned some work to examine the impacts of a dispersed population pattern on water quality and to inform proposals for future legislation, policies and procedures to address pollution related to wastewater treatment provision in rural areas. There is uncertainty about the impact of On-site Waste Water Treatment Systems (OWWTS's) on water quality for a number of reasons including:</p> <ul style="list-style-type: none"> <li>• lack of information about the location, number and condition of existing systems;</li> <li>• the difficulty of monitoring the effects of discharges from OWWTS's on surface and ground water quality;</li> <li>• lack of understanding about the relative importance of OWWTS's in relation to other pressures such as agriculture.</li> </ul> <p>It is expected that the work on the dispersed settlement pattern will help inform NIEA as to the way forward. The following actions have been agreed : Research to examine legislative requirements and responsibilities to identify best practice in relation to OWWTS; Improve existing controls, support updated guidance for new systems and to prioritise actions in areas with high concentrations of existing OWWTS; Investigate provision of main sewers or OWWTS maintenance</p>	<p>Section on Collection and treatment of sewage has been updated.</p> <p>Supplementary measures are included in the RBMPs.</p>

Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
				<p>programmes in priority areas (existing systems, large unsewered populations where water quality is threatened).</p> <p>NIEA would be interested to see the results of the surveys that the Armagh Angling Club have undertaken on the river. In addition, if the club members are aware of any specific septic tanks that are causing a pollution problems or indeed any other source of pollution then it is requested that these should either be reported on the Water Pollution Hotline (0800 807060) or in writing to NIEA, Water Management Unit, 17 Antrim Road, Lisburn, BT28 3AL.</p>	
dRBMPC on14/5	John Cunningham	Public	<p>Septic tanks. This is the most unregulated release of pollution in our countryside compared to the regulations on agriculture and industry.5.3.1, 5.3.5c, 5.3.5d, 5.3.1d - not good enough. A programme is required</p>	<p>NIEA has recently commissioned some work to examine the impacts of a dispersed population pattern on water quality and to inform proposals for future legislation, policies and procedures to address pollution related to wastewater treatment provision in rural areas. There is uncertainty about the impact of On-site Waste Water Treatment Systems (OWWTS's) on water quality for a number of reasons including:</p> <ul style="list-style-type: none"> <li>• lack of information about the location, number and condition of existing systems;</li> <li>• the difficulty of monitoring the effects of discharges from OWWTS's on surface and ground water quality;</li> <li>• lack of understanding about the relative importance of OWWTS's in relation to other pressures such as agriculture.</li> </ul>	<p>Section on Collection and treatment of sewage has been updated.</p> <p>Supplementary measures are included in the RBMPs.</p>



Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
				<p>It is expected that the work on the dispersed settlement pattern will help inform NIEA as to the way forward.</p> <p>If any members of the public are aware of any specific septic tanks that are causing a pollution problems or indeed any other source of pollution then it is requested that these should either be reported on the Water Pollution Hotline (0800 807060) or in writing to NIEA, Water Management Unit, 17 Antrim Road, Lisburn, BT28 3AL.</p>	
dRBMPCon14/6	John Cunningham	Public	Environmental and social guidance for water and sewerage services (2010-2013) - not happy with septic tank policy.	<p>NIEA has recently commissioned some work to examine the impacts of a dispersed population pattern on water quality and to inform proposals for future legislation, policies and procedures to address pollution related to wastewater treatment provision in rural areas. There is uncertainty about the impact of On-site Waste Water Treatment Systems (OWWTS's) on water quality for a number of reasons including:</p> <ul style="list-style-type: none"> <li>• lack of information about the location, number and condition of existing systems;</li> <li>• the difficulty of monitoring the effects of discharges from OWWTS's on surface and ground water quality;</li> <li>• lack of understanding about the relative importance of OWWTS's in relation to other pressures such as agriculture.</li> </ul> <p>It is expected that the work on the dispersed settlement pattern will help inform NIEA as to the way forward.</p>	<p>Section on Collection and treatment of sewage has been updated.</p> <p>Supplementary measures are included in the RBMPs.</p>

Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
				<p>If any members of the public are aware of any specific septic tanks that are causing a pollution problems or indeed any other source of pollution then it is requested that these should either be reported on the Water Pollution Hotline (0800 807060) or in writing to NIEA, Water Management Unit, 17 Antrim Road, Lisburn, BT28 3AL.</p>	
dRBMPCon22/5	John Briggs	Armagh City Council	<p>The Council notes that one issue highlighted in the consultation was the concern about possible localised sub-surface and surface pollution from poorly constructed and maintained septic tanks. Consent to discharge is granted usually after a site visit at the planning stage in any development. Consideration could be given to engaging with Building control in NI to perhaps use the expertise of their inspectors as they regularly visit building sites and could oversee septic tank construction and soak away design.</p>	<p>Comment is noted. NIEA has recently commissioned some work to examine the impacts of a dispersed population pattern on water quality and to inform proposals for future legislation, policies and procedures to address pollution related to wastewater treatment provision in rural areas. There is uncertainty about the impact of On-site Waste Water Treatment Systems (OWWTS's) on water quality for a number of reasons including:</p> <ul style="list-style-type: none"> <li>• lack of information about the location, number and condition of existing systems;</li> <li>• the difficulty of monitoring the effects of discharges from OWWTS's on surface and ground water quality;</li> <li>• Lack of understanding about the relative importance of OWWTS's in relation to other pressures such as agriculture.</li> </ul> <p>It is expected that the work on the dispersed settlement pattern will help inform NIEA as to the way forward. The following actions have been agreed : Research to examine legislative requirements and responsibilities to identify best practice in relation to OWWTS; Improve existing</p>	<p>Section on Collection and treatment of sewage has been updated.</p> <p>Supplementary measures are included in the RBMPs.</p>

Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
				controls, support updated guidance for new systems and to prioritise actions in areas with high concentrations of existing OWWTS; Investigate provision of main sewers or OWWTS maintenance programmes in priority areas (existing systems, large unsewered populations where water quality is threatened).	
dRBMPCon23/110	Claire Cockerill	Freshwater Task Force	Detailed studies are progressing to support updated guidance for new septic tank systems and prioritisation of actions in areas with high concentrations of existing on-site systems. Information on timescales and anticipated outcomes should be included in the Plan	It is hoped that policies and processes will be developed by March 2010	The RBMP will include more information on the measures required to meet the objectives in each of the 26 LMAs. Supplementary measures are included in the RBMPs.
dRBMPCon23/111	Claire Cockerill	Freshwater Task Force	Existing septic tanks suggestion should apply to 'large' – what is the definition of large?	Comment is noted.	Section on Collection and treatment of sewage has been updated.
dRBMPCon23/112	Claire Cockerill	Freshwater Task Force	A greater level of monitoring and enforcement of standard for septic tanks, i.e. compulsory clean out at least once a year.	NIEA has undertaken work to examine the impacts of a dispersed population pattern on water quality and to inform proposals for future legislation, policies and procedures to address pollution related to wastewater treatment provision in rural areas. It	Supplementary measures are included in the RBMPs.

Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
				<p>is expected this work on the dispersed settlement pattern will be completed in late 2009 and will help inform NIEA as to the way forward. Consultations on policy decisions will be advertised widely and comments received/acted upon in the normal manner. Details on this aspect of septic tank policy and process will be included in the revision work outlined.</p>	
dRBMPCon55/24	Jim Haughey	Ulster Angling Federation	<p>5.3.6 d) (Further Actions) There are some 120,000 septic tanks in NI, 90,000 of which don't work; section 5.3.1 identifies this as one of the most serious threats facing the waters, but has no programme to make good the problem; while some research for new installations is mentioned, there seems to be a no urgency in NIEA to face the problem of existing malfunctioning septic tanks. These issues need to be properly addressed in the final RBMP</p>	<p>Where pollution threats from poorly performing septic tanks are identified they will be dealt with effectively by NIEA.</p> <p>NIEA has subdivided the three River Basin Districts onto 26 Local Management Areas (LMAs), which are based on sub basin catchments. Details of these areas were included as part of the supporting documentation for the consultation on the draft plans. The LMAs are being used as the level at which measures will be set and it is planned to develop action plans to implement the RBMPs in these areas. The action plans will be implemented on a three year rolling programme to allow resources to be targeted.</p>	<p>The RBMP will include more information on the measures required to meet the objectives in each of the 26 LMAs. As part of the RBMP Implementation Programme actions plans will be developed for each LMA in liaison with stakeholder groups active in those areas.</p> <p>Supplementary</p>

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					measures are included in the RBMPs.
dRBMPCon72/13	Aileen Lawson	UFU	<p>Diffuse and Point Source Pollution (Collection and Treatment of Sewage)</p> <p>The UFU has previously raised concerns about the level of diffuse pollution from septic tanks. It is vital that there is adequate control and policing of septic tanks in order to address this. NIEA have currently insufficient resources to properly deal with the approximately 125,000 septic tanks throughout NI. Poorly maintained septic tanks must be addressed and householders must be educated about their septic tank and the importance of ensuring that it is working properly. The UFU suggests that information on this could be issued to householders with the annual rates bills.</p>	<p>NIEA has recently commissioned some work to examine the impacts of a dispersed population pattern on water quality and to inform proposals for future legislation, policies and procedures to address pollution related to wastewater treatment provision in rural areas. There is uncertainty about the impact of On-site Waste Water Treatment Systems (OWWTS's) on water quality for a number of reasons including:</p> <ul style="list-style-type: none"> <li>• lack of information about the location, number and condition of existing systems;</li> <li>• the difficulty of monitoring the effects of discharges from OWWTS's on surface and ground water quality;</li> <li>• lack of understanding about the relative importance of OWWTS's in relation to other pressures such as agriculture.</li> </ul> <p>It is expected that the work on the dispersed settlement pattern will help inform NIEA as to the way forward.</p>	<p>Section on Collection and treatment of sewage has been updated.</p> <p>Supplementary measures are included in the RBMPs.</p>

### 3.5 Programme of Measures

#### 3.5.1 Programme of Measures

Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
dRBMPC on23/40	Claire Cockrill	Freshwater Task Force	The Freshwater Taskforce suggests that in order to avoid future infringement proceedings, the draft Plans must consider and commit to more additional measures that are specific to individual water bodies. This, in part, can be achieved through engaging local communities in local water body management projects that are actively supported by relevant Agency representatives. It is by developing this multifaceted approach that 'good quality status' will be achieved in a way that is effective and most cost efficient.	NIEA has subdivided the three River Basin Districts onto 26 Local Management Areas (LMAs), which are based on sub basin catchments. Details of these areas were included as part of the supporting documentation for the consultation on the draft plans. The LMAs are being used as the level at which measures will be set and it is planned to develop action plans to implement the RBMPs in these areas. The action plans will be implemented on a three year rolling programme to allow resources to be targeted	The RBMP will include more information on the measures required to meet the objectives in each of the 26 LMAs. As part of the RBMP Implementation Programme actions plans will be developed for each LMA in liaison with stakeholder groups active

Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
					in those areas
dRBMPC on100/5	CSG Meeting: Upper Foyle	CSG Meeting: Upper Foyle	<p>Lack of data on fish may mean additional measures required.</p> <ul style="list-style-type: none"> <li>- Plans should show links to freshwater pearl mussel plans.</li> <li>- Reference barriers to fish migration in plan.</li> <li>- Bring in self monitoring at catchment level – water users.</li> <li>- Disposal of sheep dip mixed with slurry not mentioned, query over derogation in relation to this practice.</li> <li>- FEPA dealing with dredging.</li> <li>- Control of culverts needs addressed – The lead department is Planning Service.</li> <li>- Forestry guidelines – reference to planting needed.</li> </ul>	Points noted. This summary has been covered in detailed comments – please see Working Together, Agriculture, Morphology and Forestry topics.	Any changes required have been listed against relevant comments.
dRBMPC on14/8	John Cunningham	Public	Introduction in plans - 1.1 Will the competent authority DOE really drive a River Management with no programme of actions or targets set?*5 Programme of Measures 'what measures?'	NIEA has subdivided the three River Basin Districts onto 26 Local Management Areas (LMAs), which are based on sub basin catchments. Details of these areas were included as part of the supporting documentation for the consultation on the draft plans. The LMAs are being used as the level at which measures will be set and it is planned to develop action plans to implement the RBMPs in these areas. The action plans will be implemented on a three year rolling programme to allow resources to be targeted	As part of the RBMP Implementation Programme actions plans will be developed for each LMA in liaison with stakeholder groups active

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					in those areas.
dRBMPCon18/2	George Butler	NI Water	It was very useful to compare the aspirations of other parts of UK and ROI. I suggest the Strangford level of improvements are realistic in the early years (Quick Wins and existing measures) but will not be sustained (say mid 80% by 2021 rather than 96%). I suggest the overall NI aspiration of 72% meeting Good status by 2015 is not supported by current Programme of Measures and other measures.	<p>The level of ambition set out in the plan is higher than in the rest of the UK and we have sought to establish objectives that are challenging but are realistic in terms achievement. The initial set objectives, using the rules established in the plan, have been reviewed by expert working groups to consider if higher objectives could be achieved within the life of the plan or whether the objectives are unrealistic given the current knowledge and understanding of the pressures on individual waterbodies and the effectiveness of the available measures.</p> <p>NIEA has subdivided the three River Basin Districts onto 26 Local Management Areas (LMAs) , which are based on sub basin catchments. Details of these areas were included as part of the supporting documentation for the consultation on the draft plans. The LMAs are being used as the level at which measures will be set and it is planned to develop action plans to implement the RBMPs in these areas. The action plans will be implemented on a three year rolling programme to allow resources to be targeted</p>	The objectives have been reviewed using the 2009 status classification data and will be presented in the RBMP. Additional information on the reasons for setting alternative objectives through the use of extended deadlines is now included in the RBMPs. As part of the



Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
					RBMP Implementation Programme actions plans will be developed for each LMA in liaison with stakeholder groups active in those areas.
dRBMPC on23/3	Claire Cockrill	Freshwater Task Force	Further details are required on the POM for each water body and groundwater including how the proposed measures will contribute to an overall improvement in their condition. There is insufficient information provided on how measures have been appraised and how decisions have been made. Delivery groups on the ground need to know how to register projects.	NIEA has subdivided the three River Basin Districts onto 26 Local Management Areas (LMAs) , which are based on sub basin catchments. Details of these areas were included as part of the supporting documentation for the consultation on the draft plans. The LMAs are being used as the level at which measures will be set and it is planned to develop action plans to implement the RBMPs in these areas. The action plans will be implemented on a three year rolling programme to allow resources to be targeted	The RBMP will include more information on the measures required to meet the objectives in each of the 26 LMAs. As part of the RBMP Implementation Programme actions plans

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					will be developed for each LMA in liaison with stakeholder groups active in those areas
dRBMPC on23/39	Claire Cockerill	Freshwater Task Force	<p>Summary:</p> <ul style="list-style-type: none"> <li>• There is too much reliance on existing measures</li> <li>• Increased monitoring to ensure compliance with existing measures is required</li> <li>• Increased enforcement of existing measures is required</li> <li>• Measures should be prioritised according to cost effectiveness</li> <li>• Measures should be specific to local areas</li> <li>• Measures to improve status of Protected Areas are required</li> <li>• A greater commitment to additional resources is required</li> </ul>	Points noted. This summary has been covered in detailed comments.	Any changes required have been listed against relevant comments.
dRBMPC on23/41	Claire Cockerill	Freshwater Task Force	Although the Plans allude to the potential new measures which are under consideration, further information is required on the impact these measures are likely to have as well as information on the timetable for action, resources and responsibilities for implementing these measures. It is not explained how the Programme of Measures proposed, be it existing	NIEA has subdivided the three River Basin Districts onto 26 Local Management Areas (LMAs) , which are based on sub basin catchments. Details of these areas were included as part of the supporting documentation for the consultation on the draft plans. The LMAs are being used as the level at which measures will be set and it is planned to develop action plans to implement the RBMPs in	As part of the RBMP Implementation Programme actions plans will be developed for

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			or new measures, will achieve the objective targets that have been set earlier in the document, i.e. no appraisal or prioritising of measures.	these areas. The action plans will be implemented on a three year rolling programme to allow resources to be targeted	each LMA in liaison with stakeholder groups active in those areas. An SEA statement will be produced with the plans.
dRBMPC on23/46	Clair e Cock erill	Freshw ater Task Force	A River Restoration Fund should be established that is accessible to approved charitable and voluntary bodies as well as NIEA.	As part of the implementation of the River Basin Plans an interdepartmental "River Restoration and Improvement Programme" bid is being prepared. A key element of the programme will be to take forward specific projects aimed at improving and restoring impacted river habitats. Further consideration will be given as to how best to work within the existing regulatory framework to develop mechanisms to establish and support such a fund as proposed.	A new supplementary measure on the establishment of River Trusts has been included in the RBMPs
dRBMPC on23/47	Clair e Cock erill	Freshw ater Task Force	The draft Plans do not set out how water quality will be achieved at either River Basin District or local catchment management level i.e. local area management plans. The most effective action would be to include information on individual water bodies. Specifically, (i) which measures have been considered disproportionately costly, (ii) some detail on the reasons why a certain problem is technically unfeasible to address and	NIEA has subdivided the three River Basin Districts onto 26 Local Management Areas (LMAs), which are based on sub basin catchments. Details of these areas were included as part of the supporting documentation for the consultation on the draft plans. The LMAs are being used as the level at which measures will be set and it is planned to develop action plans to implement the RBMPs in these areas. The action plans will be implemented	Additional information on the reasons for setting alternative objectives through the use of

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			finally (iii) what measures or investigation is planned. Making this critical information more readily available would not only reduce the number of information requests but also provide the vital background information necessary for many groups to develop and bring forward targeted measures.	on a three year rolling programme to allow resources to be targeted. Costs and benefits will be considered when deciding how best to implement the required measures at the catchment scale. Additional information on the reasons for setting alternative objectives through the use of extended deadlines will be provided in the 1st cycle plan to be published in December 2009	extended deadlines is now included in the RBMPs
dRBMPCon23/62	Clair e Cock erill	Freshw ater Task Force	The Taskforce recognises that Departmental effort alone cannot improve NI's water quality to the required standard. The Taskforce believes that NGOs provide a wealth of useful resources that have not been capitalised upon. NGOs can provide advice, information, expertise, the opportunity to actively engage wider public through their membership bases access to the wider public that could assist in the implementation of measures. NGOs can also provide management and restoration plans for different reserves and land holdings that compliment WFD commitments. A list of resources can be provided upon request.	Comment is noted. The Department plan to further develop collaborative working arrangements through for example the Catchment Stakeholder Groups and the development of Local Management Area action plans.	The RBMP will include more information on the measures required to meet the objectives in each of the 26 LMAs. As part of the RBMP Implementation Programme actions plans will be developed for each LMA in liaison with stakeholder

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					groups active in those areas
dRBMPC on23/88	Clair e Cock erill	Freshw ater Task Force	The FWTF believes that a timeframe for implementing the proposed measures in section 5.2.5 further actions, needs to be specified immediately. Without this action, the farming industry will have limited incentive to work towards a 2015 deadline. Section (c)6 in particular needs to be communicated to the industry so that appropriate action can be taken.	The RBMP will include more information on the measures required to meet the objectives in each of the 26 LMAs. As part of the RBMP Implementation Programme actions plans will be developed for each LMA in liaison with stakeholder groups active in those areas.	As part of the RBMP Implementation Programme actions plans will be developed for each LMA
dRBMPC on23/92	Clair e Cock erill	Freshw ater Task Force	Section 5.3.4 states that 'a 20% improvement will be delivered by all of the current actions listed above in order to achieve the objectives set in this plan. Further research is being undertaken to determine whether these measures have been successful or whether further additional measures will be required'. The FWTF believes that this research should be made publicly available, along with current status updates to help measure progress.	The 20% refers to a reduction in phosphorus loadings due to existing agricultural measures. The report on the research undertaken will be made publicly available when it is completed. The Department will publish annual updates on status using a combination of biological and chemical indicators.	Section on Agriculture has been updated .
dRBMPC on23/121	Clair e Cock erill	Freshw ater Task Force	5.4.5 R&D • NIEA are 'considering' developing a modeling tool. This will need to be matched by additional resources to implement actions	Comment is noted. It is planned, subject to funding, to develop catchment models to assess the impacts of both point source and diffuse pollution pressures. These models will be used to quantify, where possible, the improvements in status resulting from current (basic) measures. An inter - departmental bid has been prepared to cover the period April 2010 - March 2013. Any	The RBMP includes measures to develop the models required to undertake this work.

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				proposals for additional expenditure will be the subject of bids through the normal Budget process and in-year monitoring rounds.	
dRBMPCon23/139	Claire Cockerill	Freshwater Task Force	<ul style="list-style-type: none"> <li>• 5.7.4: More detail is required to explain the impact that current measures will have on improving the status of water bodies for each RBD.</li> </ul>	It is planned, subject to funding, to develop catchment models to assess the impacts of both point source and diffuse pollution pressures. These models will be used to quantify, where possible, the improvements in status resulting from current (basic) measures.	The RBMP includes measures to develop the models required to undertake this work.
dRBMPCon31/4	Colin McCabrey	Castlereagh Borough Council	A service programme needs to be communicated to support the Management Plan. This should advise all stakeholders involved in the delivery of projects on the river with whom they should consult for advice.	The Department will review its communication strategy as part of the development of the Local Management Areas action plans.	The LMA action plans will include information on stakeholder communication.

Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
dRBMPC on38/4	John Arneill	Ballynure Angling Club	Further information is needed about individual water bodies - including causes of failure, which measures have been considered for the water body and why they have been considered to be either technically infeasible or disproportionately costly. Without this detail we cannot comment on the essence of the projected plans.	NIEA has subdivided the three River Basin Districts onto 26 Local Management Areas (LMAs), which are based on sub basin catchments. Details of these areas were included as part of the supporting documentation for the consultation on the draft plans. The LMAs are being used as the level at which measures will be set and it is planned to develop action plans to implement the RBMPs in these areas. The action plans will be implemented on a three year rolling programme to allow resources to be targeted. Costs and benefits will be considered when deciding how best to implement the required measures at the catchment scale. Additional information on the reasons for setting alternative objectives through the use of extended deadlines will be provided in the 1st cycle plan to be published in December 2009	The RBMP will include more information on the measures required to meet the objectives in each of the 26 LMAs. As part of the RBMP Implementation Programme actions plans will be developed for each LMA in liaison with stakeholder groups active in those areas.
dRBMPC on40/2	Declan Lawlor	Loughs Agency	POMs need to be stated more clearly.	NIEA has subdivided the three River Basin Districts onto 26 Local Management Areas (LMAs), which are based on sub basin catchments. Details of these areas were included as part of the supporting documentation for the consultation on the draft	The RBMP will include more information on the

Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
				plans. The LMAs are being used as the level at which measures will be set and it is planned to develop action plans to implement the RBMPs in these areas. The action plans will be implemented on a three year rolling programme to allow resources to be targeted.	measures required to meet the objectives in each of the 26 LMAs. As part of the RBMP Implementation Programme actions plans will be developed for each LMA in liaison with stakeholder groups active in those areas.
dRBMPC on40/4	Declan Lawlor	Loughs Agency	Concern that the chosen boundaries may distort allocation of resources in terms of POMs in future.	The boundaries have been established in relation to the hydrological features of the water ways and resources will be allocated in relation to the implementation programme and where it is considered effecting, to deliver the objectives of the plan. NIEA has subdivided the three River Basin Districts onto 26 Local Management Areas (LMAs), which are based on sub basin catchments. Details of these areas were included as part of the supporting documentation for the consultation on	The RBMP will include more information on the measures required to meet the objectives in each of the



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				<p>the draft plans. The LMAs are being used as the level at which measures will be set and it is planned to develop action plans to implement the RBMPs in these areas. The action plans will be implemented on a three year rolling programme to allow resources to be targeted.</p>	<p>26 LMAs. As part of the RBMP Implementation Programme actions plans will be developed for each LMA in liaison with stakeholder groups active in those areas.</p>
dRBMPCon55/5	Jim Haughey	Ulster Angling Federation	<p>Basic information is missing which is needed about individual water bodies – including causes of failure, which measures have been considered for the water body, and why they have been considered to be either technically infeasible or disproportionately costly. Without this detail, we and the general public cannot comment on the very essence of the projected plans.</p>	<p>NIEA has subdivided the three River Basin Districts onto 26 Local Management Areas (LMAs), which are based on sub basin catchments. Details of these areas were included as part of the supporting documentation for the consultation on the draft plans. The LMAs are being used as the level at which measures will be set and it is planned to develop action plans to implement the RBMPs in these areas. The action plans will be implemented on a three year rolling programme to allow resources to be targeted. Costs and benefits will be considered when deciding how best to implement the required measures at the catchment scale. Additional information on the reasons for setting alternative objectives through the use of extended</p>	<p>The RBMP will include more information on the measures required to meet the objectives in each of the 26 LMAs. As part of the RBMP Implementation</p>

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				deadlines will be provided in the 1st cycle plan to be published in December 2009	Programme actions plans will be developed for each LMA in liaison with stakeholder groups active in those areas. Additional information on the reasons for setting alternative objectives through the use of extended deadlines is now included in the RBMPs

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dRBMPC on56/1	Daws on McAlister	Public	When evaluating actions to be implemented through this plan these will reflect the delicate balance of social and economic needs, as well as environmental ones, also, acknowledging the necessity of the communities and businesses presently established, through historic activities and location to flourish and grow under any new strategies adopted.	Comment noted. The Department has engaged consultants to prepare a strategic impact assessment on costs and benefits of proposed new measures over and above basic measures that are required irrespective of WFD. The strategic impact assessment will be included in the River Basin Management Plans to be published in December 2009.	The strategic impact assessment will be included in the River Basin Management Plans to be published in December 2009.
dRBMPC on58/11	Angela Halpeny	NIWater	<p>Actions have been identified for NI Water in the existing actions section of the draft RBMP, with further actions listed to deliver environmental improvements.</p> <p>Actions for NI Water include the following key points:</p> <ul style="list-style-type: none"> <li>• Promotion of sustainable water use and safeguarding of drinking water quality.</li> </ul> <p>Ø NI Water will proactively inspect both commercial and domestic properties with regard to the Water Supply (Water Fittings) Regulations (NI) 2009</p> <p>Ø Reduction in leakage, which in return will reduce environmental impacts at abstraction sites, reduce pumping and treatment costs and energy use leading to reduced CO2 emissions</p> <p>Ø Drinking Water Safety Plans to safeguard water quality are currently being developed,</p>	Comments are noted.	<p>Section on Abstraction and flow regulation has been updated.</p> <p>Section on Collection and treatment of sewage has been updated.</p>

Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
			<p>using a risk based approach</p> <ul style="list-style-type: none"> <li>Ø NI Water Resource Strategy main aim is the rationalisation of drinking water sources.</li> <li>Ø Education and awareness to encourage the wise use of water e.g. Hippo Water Saver</li> <li>• Diffuse and Point Source Pollution</li> <li>Ø NI Water Capital Works Programme (2007 – 2010) shows investment in upgrades of major WWTW and sewerage systems, with a budget of £676 over the 3 year period.</li> <li>Ø Urban Pollution Management – NI Water works closely with NIEA to identify and rectify unsatisfactory combined sewer overflows, reducing the volume spilt.</li> <li>Ø Education and Awareness - Bag It and Bin It Campaign promotes the appropriate disposal of sanitary materials, thus preventing blockages and premature operation of CSO's and treatment difficulties.</li> <li>Ø Education and Awareness.</li> <li>Ø Supporting Sustainable Development by connection to the sewerage system and treatment at a WWTW, rather than the private developer discharging directly to the environment. Restrictions apply where the receiving WWTW is at capacity.</li> <li>Ø Reduction in pollution at source from industrial discharges through Trade Effluent consents and inspections.</li> </ul> <p>Through dissemination and bringing a general</p>		

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			awareness of the above listed schemes through the RBMPs should lead to improved linkage.		
dRBMPCon63/5	John Kelpie	Derry City Council	Derry City Council by leading on the implementation of the Derry/Londonderry BAP could help deliver local initiatives as and when identified. These would form part of the Rivers and Streams Habitat Action Plan and Inner Foyle Habitat Action Plan. Through these plans small working groups will be set up that could discuss and initiate action in the Derry City Council Area	Comment noted. The reader is directed to the 'Register of Plans and Programmes', a supporting web based document, for further information.	A more detailed link will be identified between the RBMPs and other plans and programmes included in the RBMPs. Section detailing 'Register of Plans and Programmes' has been updated.
dRBMPCon65/10	Claire Cockerill	WWF NI	WWF-NI does not think that the methods being used to address the issues are satisfactory. Within the existing draft plans, NIEA have compiled an inventory of existing legislation for each of the pressures identified. However, under this legislation, only 27% of freshwaters covered by the NI RBMPs have achieved the status of water quality required by the Water Framework Directive. Furthermore, the Plans do not set out how water quality will be achieved at water body	NIEA has subdivided the three River Basin Districts onto 26 Local Management Areas (LMAs) , which are based on sub basin catchments. Details of these areas were included as part of the supporting documentation for the consultation on the draft plans. The LMAs are being used as the level at which measures will be set and it is planned to develop action plans to implement the RBMPs in these areas. The action plans will be implemented on a three year rolling programme to allow	The RBMP will include more information on the measures required to meet the objectives in each of the

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			level.	resources to be targeted.	26 LMAs. As part of the RBMP Implementation Programme actions plans will be developed for each LMA in liaison with stakeholder groups active in those areas.
dRBMPCon65/14	Claire Cockrill	WWF NI	WWF-NI believes that in order to avoid future infraction proceedings, the draft Plans must consider and commit to additional measures that are specific to individual water bodies. This can be achieved through engaging local communities in local water body management projects that are actively supported by relevant Agency representatives. It is only by doing this that 'good quality status' will be achieved in a way that is most effective and most cost efficient.	NIEA has subdivided the three River Basin Districts onto 26 Local Management Areas (LMAs) , which are based on sub basin catchments. Details of these areas were included as part of the supporting documentation for the consultation on the draft plans. The LMAs are being used as the level at which measures will be set and it is planned to develop action plans to implement the RBMPs in these areas. The action plans will be implemented on a three year rolling programme to allow resources to be targeted.	The RBMP will include more information on the measures required to meet the objectives in each of the 26 LMAs. As part of the RBMP Implementation

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					Programme actions plans will be developed for each LMA in liaison with stakeholder groups active in those areas.
dRBMPC on65/15	Claire Cockerill	WWF NI	WWF-NI's RIPPLE project (Rivers Involving People Places and Leading by Example) has facilitated a local community in devising a River Basin Action Plan for their local water body, the River Ballinderry in Cookstown. RIPPLE demonstrates the role for public participation in implementing the additional measures required to achieve WFD objectives. WWF-NI recognises that the Departmental effort alone cannot improve NI's water quality to the required standard and proposes this project as a template that could be adapted and implemented for the management of water bodies across NI.	Comment is noted. The Department has had some involvement in this project and will consider how the approach could be adapted for the development and implementation of LMA actions plans.	As part of the RBMP Implementation Programme actions plans will be developed for each LMA in liaison with stakeholder groups active in those areas

Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
dRBMPCon66/2	Andrew McDowell	National Trust	A much greater commitment to new measures is needed to ensure that there is a reasonable chance of meeting the aims of the RBMP process – improved ecological health, more sustainable usage, better habitats, reductions in hazardous substances and groundwater pollution, greater flood and drought mitigation.	Further work has been carried out to clearly identify where "new measures" over and above current basic measures that will be required to meet the objectives set out in the plans. The information provided in the plans will include reasons for setting alternative objectives, linking measures to the objectives and where relevant measures for protected areas under the Habitats and Birds Directives. Six additional "new measures" have been identified as part of the consultation responses received.	The RBMP will include more information on the measures required to meet the objectives in each of the 26 LMAs. As part of the RBMP Implementation Programme actions plans will be developed for each LMA in liaison with stakeholder groups active in those areas.



Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
dRBMPCon66/13	Andrew McDowell	National Trust	The plans provide a useful guide to existing measures at a macro level, particularly in the summaries of relevant NI, UK and EU legislation at section five in each document. However the linkage between the existence of legislation and the way in which it is being used to 'address the issues' is less clear. Overall, the fact that the plans identify very few additional measures is a major flaw.	Further work has been carried out to clearly identify where "new measures" over and above current basic measures that will be required to meet the objectives set out in the plans. The information provided in the plans will include reasons for setting alternative objectives, linking measures to the objectives and where relevant measures for protected areas under the Habitats and Birds Directives. Six additional "new measures" have been identified as part of the consultation responses received.	The RBMP will include more information on the measures required to meet the objectives in each of the 26 LMAs. As part of the RBMP Implementation Programme actions plans will be developed for each LMA in liaison with stakeholder groups active in those areas.

Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
dRBMPCon66/15	Andrew McDownell	National Trust	The interactive maps on the RBMP website could be very helpfully improved by identifying measures which may be appropriate at the level of individual water bodies. Currently users searching for information on measures to combat individual pressures in particular water bodies are directed back to more generic content.	NIEA has subdivided the three River Basin Districts onto 26 Local Management Areas (LMAs), which are based on sub basin catchments. Details of these areas were included as part of the supporting documentation for the consultation on the draft plans. The LMAs are being used as the level at which measures will be set and it is planned to develop action plans to implement the RBMPs in these areas. The action plans will be implemented on a three year rolling programme to allow resources to be targeted. The interactive maps on the RBMP website will allow the user to view measures which will be appropriate to water bodies within a LMA.	The interactive map has been developed to include measures at a more local level.
dRBMPCon66/18	Andrew McDownell	National Trust	National Trust Measures on detail for some of the new and existing measures National Trust would hope to help deliver:	Information has been noted. These National Trust Measures have been used to update the Register of Plans and Programmes.	'Register of Plans and Programmes' has been revised.
dRBMPCon68/3	Patrick Casement	CNCC	On a general level, it is felt that the Plans lack detail about the Programme of Measures (POMs) for each water body and, in particular, how they will contribute to improvement in their condition.	NIEA has subdivided the three River Basin Districts onto 26 Local Management Areas (LMAs), which are based on sub basin catchments. Details of these areas were included as part of the supporting documentation for the consultation on the draft plans. The LMAs are being used as the level at which measures will be set and it is planned to develop action plans to implement the RBMPs in these areas. The action plans will be implemented on a three year rolling programme to allow	The RBMP will include more information on the measures required to meet the objectives in each of the

Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
				resources to be targeted.	26 LMAs. As part of the RBMP Implementation Programme actions plans will be developed for each LMA in liaison with stakeholder groups active in those areas
dRBMPCon68/6	Patrick Case ment	CNCC	A considerable investment of effort has been made by both stakeholders and government into the SWMI process. The resulting digest could be seen as a comprehensive statement of stakeholders concerns, so it is disappointing that no mechanism has been created to trace these concerns through to the POMs. It is strongly recommended that this be done, to both improve stakeholder confidence in WFD delivery and also give assurance that no issues remain unaddressed in the Plans.	The River Basin Management Plan pressures were developed from the SWMI pressures identified during the SWMI consultation. These influenced the draft plans. The revised plans will continued this theme applying a more local aspect to the programme of measures.	As part of the consultation response information has been provided, where applicable, to clearly show how the plans have been revised to address the issue raised.

Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
dRBMPCon68/25	Patrick Case ment	CNCC	<p>5 POMs are very vague and don't specifically address the issues raised at the SWMI meetings. For example, the need to identify and assess impact of old landfill sites is not discussed, despite being raised during the SWMI meetings. However, the supplementary measures described at the end of the section are most welcome. It is a pity that more details of these are not included, so as to allow comment on their desirability. Notwithstanding this, it is felt that the introduction of phosphate free detergents should be strongly encouraged in the catchments of our major lakes, given their hyper-eutrophic state.</p>	<p>NIEA has subdivided the three River Basin Districts onto 26 Local Management Areas (LMAs), which are based on sub basin catchments. Details of these areas were included as part of the supporting documentation for the consultation on the draft plans. The LMAs are being used as the level at which measures will be set and it is planned to develop action plans to implement the RBMPs in these areas. The action plans will be implemented on a three year rolling programme to allow resources to be targeted</p>	<p>The RBMP will include more information on the measures required to meet the objectives in each of the 26 LMAs. As part of the RBMP Implementation Programme actions plans will be developed for each LMA in liaison with stakeholder groups active in those areas.</p>

Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
dRBMPC on85/6	Sean Convery	FWAG NI	The reports have identified many of the most significant pressures. In FWAG's opinion, much focus still has to remain on industry, private septic tanks and built developments. Industry still has little reason to fear the punishments for breach. In relation to agriculture, we believe that the focus will move on from Nitrates to that of Phosphates and Zinc.	Where sectors are identified as the key source in an LMA, supplementary measures will be targeted at that sector.	The RBMP will include more information on the measures required to meet the objectives in each of the 26 LMAs. As part of the RBMP Implementation Programme actions plans will be developed for each LMA in liaison with stakeholder groups active in those areas.

Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
dRBMPCon85/8	Sean Convery	FWAG NI	<p>The existing measures do appear to be well covered. Some of the measures are ‘talked up’ both by the affected industry and its Government legislators. A few are just ‘paper exercises’. FWAG’s experience of nutrient management within the industry suggests that apart from price impacts, there is little attitudinal change or recognition of the value of water quality. We are concerned that farming will once again be pressurised if water quality improvements do not occur. There is a need to be open and transparent regarding other options that Government may be considering if water quality does not improve and the implications of these upon the agricultural sector.</p>	<p>NIEA has subdivided the three River Basin Districts onto 26 Local Management Areas (LMAs), which are based on sub basin catchments. Details of these areas were included as part of the supporting documentation for the consultation on the draft plans. The LMAs are being used as the level at which measures will be set and it is planned to develop action plans to implement the RBMPs in these areas. The action plans will be implemented on a three year rolling programme to allow resources to be targeted</p>	<p>The RBMP will include more information on the measures required to meet the objectives in each of the 26 LMAs. As part of the RBMP Implementation Programme actions plans will be developed for each LMA in liaison with stakeholder groups active in those areas.</p>

Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
dRBMPC on90/17	Clerk to the Environment Committee & Committee for Regional Development	Committee for Regional Development and Environment Committee	The organisations with commercial or business interests were of the view that the significant pressures affecting the water environment were mostly identified, however the view was expressed that some pressures were being given greater emphasis than others, and other issues may have been overlooked. Examples provided included, river drainage, peat extraction, and the role of anglers. The view was expressed that industrial pollution was no longer a problem, however it was essential that those organisations playing a role in achieving the objectives set in the Draft Plans are adequately resourced.	Comment is noted. In the main respondees considered that the significant pressures had been identified. However there may be cases where particular activities, such as those identified, may have a greater localised impact. In those cases this would be addressed through Local Management Area (LMA) action plans.	As part of the RBMP Implementation Programme actions plans will be developed for each LMA in liaison with stakeholder groups active in those areas.
dRBMPC on90/21	Clerk to the Environment Committee & Committee for Regional Development	Committee for Regional Development and Environment Committee	Organisations with environmental interests made a series of suggestions as to how to improve the methods identified to address the issues in the draft Plans. It was noted that the Plans list the existing legislation, however under this legislation, only 27% of freshwaters covered by the draft RBMPs have achieved the status of water quality required by the Water Framework Directive. It was suggested that the draft Plans should consider and commit to additional measures that are specific to individual water bodies.	NIEA has subdivided the three River Basin Districts into 26 Local Management Areas (LMAs), which are based on sub basin catchments. Details of these areas were included as part of the supporting documentation for the consultation on the draft plans. The LMAs are being used as the level at which measures will be set and it is planned to develop action plans to implement the RBMPs in these areas. The action plans will be implemented on a three year rolling programme to allow resources to be targeted	The RBMP will include more information on the measures required to meet the objectives in each of the 26 LMAs. As part of the RBMP Implementation

Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
	lopment				on Programme actions plans will be developed for each LMA in liaison with stakeholder groups active in those areas.



### 3.5.2 Review of Legislation

Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
dRBMPC on14/3	John Cunningham	Public	I note that the NI Water Resources is still under review, why is it not complete? 5.1.5 - you state 'actions will deliver', what actions?!	NIW has a current water resource strategy 2002 - 2030 which has generated and continues to generate capital expenditure in relation to water resources. The strategy is however long term and is subject to review on a regular basis. At present NIW is in the process of reviewing and updating the strategy using current methodologies for water resource planning which have been developed since the 2002 - 2030 strategy was produced. The strategy will also be referred to as a water resource management plan which is in line with the current process in GB.	Section on Abstraction and flow regulation has been updated.
dRBMPC on23/95	Clair Cockrill	Freshwater Task Force	5.3.3 Planning Controls states that "NIEA is undertaking research to examine legislative requirements and responsibilities and identification of best practice in relation to On-site waste water treatment systems. This will result in a more consistent approach and provide guidance for a wider range of situations". The Freshwater Taskforce request that details on timeframes, involved agencies and the intended outcomes of this research are included in the RBMPs.	NIEA has undertaken work to examine the impacts of a dispersed population pattern on water quality and to inform proposals for future legislation, policies and procedures to address pollution related to wastewater treatment provision in rural areas. It is expected this work on the dispersed settlement pattern will be completed in late 2009 and it will inform NIEA as to the way forward. Consultations on policy decisions will be advertised widely and comments received/acted upon in the normal manner. Timeframes for completion of the work have not been confirmed.	Supplementary measures are included in the RBMPs.

Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
dRBMPC on23/107	Clair e Cock erill	Freshw ater Task Force	A Review of waste water consent conditions took place in 2008; details on the main anticipated outcomes should be included.	The review of consent conditions to meet the WFD requirements will take place in 2010. These have been delayed due to the ongoing process of objective setting for waterbodies.	Section on Industry & other businesses has been updated.
dRBMPC on23/120	Clair e Cock erill	Freshw ater Task Force	Groundwater Daughter Directive Toolkit; More information is required on what this will achieve, when it is likely to become effective and the contribution to WFD compliance.	On 12th December 2006 a new Directive was adopted by the European Commission known as the Groundwater Daughter Directive (2006/118/EC). It is a 'daughter' Directive of the Water Framework Directive (WFD) and its purpose is to clarify certain objectives for groundwater quality in the WFD. The new Directive operates alongside the 1980 Groundwater Directive until 2013 when the 1980 Directive will be repealed. The new Directive includes criteria for the assessment of good chemical status and for identifying and reversing upward trends in pollution. Threshold values must be set for the purpose of classifying chemical status. Two "standards" (for nitrates and pesticides) set in the new Directive and locally derived threshold values for other pollutants are to be used as triggers for investigation into whether certain environmental and amenity requirements are at risk. The new Directive also details measures to prevent inputs of hazardous substances, limit the input of non-hazardous pollutants and take action to address diffuse pollution wherever technically feasible to achieve good chemical status in	The RBMP will include more information on the measures required to meet the objectives in each of the 26 LMAs. As part of the RBMP Implementation Programme actions plans will be developed for each LMA in liaison with stakeholder groups active in those

Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
				<p>groundwater. A range of exemptions to the prevent and limit requirement are available. The new Directive however provides for a wider range of substances and anthropogenic influences. A 12 week consultation exercise on the transposition of the Groundwater Daughter Directive closed on 6th May 2009 and the Groundwater Regulations (NI) 2009 were made on 2nd July 2009. These Regulations came into operation on 10th August 2009 at which time the Groundwater Regulations (NI) 1998 were revoked. However the new Groundwater Regulations incorporate the requirements of the 1998 Regulations providing continuity and clarity for groundwater protection. The new Regulations also provide for existing authorisations to remain valid whilst allowing a slightly more comprehensive risk based approach to pollution prevention and control. For example a four-yearly review cycle for authorisations was required under the 1980 Directive. The new Regulations require all authorisations to be reviewed by December 2012. Thereafter however the NIEA can review authorisations at any frequency and to any extent justified in relation in risk. The new Regulations also specifically extend notice powers and codes of practice to cover diffuse sources.</p>	<p>areas</p> <p>Sections on Urban Development and Industry &amp; other businesses have been updated.</p>

Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
dRBMPC on23/133	Clair e Cock erill	Freshw ater Task Force	The Water Order sets quantity and quality levels for the effluent that may be discharged. The Taskforce recommend that these limits should be reviewed annually and tightened to allow for improvement in ecological status as described by WFD.	Consents to discharge will be assessed to ensure that they are compliant with their consent conditions on a quarterly basis. The consent limits themselves will be reviewed on production of the RBMP to ensure they meet the set objectives. The Water Order makes provision to review consents on a 4 yearly basis.	Section on Industry & other businesses has been updated.
dRBMPC on23/140	Clair e Cock erill	Freshw ater Task Force	The mining and waste directive was adopted in 2006, however little action has been taken forward since then. The FWTF believes appropriate implementation of this directive should commence immediately.	The Mining Waste Directive transposition to NI Regulations is in progress.	Section on Waste has been updated.
dRBMPC on23/175	Clair e Cock erill	Freshw ater Task Force	It is also disappointing to note that little new thinking has been included in the “further action required to deliver environmental improvements”. Additional angling regulations are mentioned however many of these regulations have already been implemented on a voluntary basis by concerned clubs and anglers. Government need to also play their part in this and be accountable for their actions. Whilst these new regulations will help to improve salmon and trout numbers, it does not address the real issues of habitat degradation and water quality which is needed to restore our salmonid populations.	The DCAL Atlantic salmon management strategy outlines plans to conserve, restore, enhance and rationally manage Atlantic salmon taking account of the best available scientific information. This deals with fisheries management, protection and restoration of habitat, and aquaculture and related activities.	Section on Fisheries has been updated.

### 3.5.3 Review of Consents

Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
dRBMPC on23/109	Clair e Cock erill	Freshw ater Task Force	Detailed studies being carried out to support a review of consents. Information on timescales and anticipated outcomes should be included in the Plan	Consents will only be reviewed if the RBMP identifies the particular water body as being at risk of not meeting its objectives.	The RBMP will include more information on the measures required to meet the objectives in each of the 26 LMAs.
dRBMPC on55/23	Jim Haug hey	Ulster Angling Federa tion	5.3.6 b) (Further Actions - Review of Consents) NIEA undertakes to carry out a Review of Consents during 2008 - presumably these are now completed. The lack of any rigour is demonstrated by the comment that "This may require minor changes" (our italic). In addition we presume that the reduced summer flow rates now predicted as a result of climate change have been ignored. These consents need to be re-reviewed as a result.	The review of consent conditions to meet the WFD requirements will take place in 2010. These have been delayed due to the ongoing process of objective setting for waterbodies.	Section on Industry & other businesses has been updated.  Section on Collection and treatment of sewage has been updated .

Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
dRBMPC on64/6	Laverne Bell	QPANI	The proposals refers to review of discharge consents by 2012, this may affect how some of our members operate in the future, more information is required by the industry about the review of consents. Diffuse pollution modeling could be developed in conjunction with the Aggregates Mapping Project for Northern Ireland, and identify future actions the industry should be aware of, including sensitive areas.	The process of review for consents will be discussed directly with each sector in late 2009 early 2010. In general terms consents will only be reviewed where the RBMPs have identified the waterbody is at risk of failing to meet its objective.	Section on Industry & other businesses has been updated.
dRBMPC on68/34	Patrik Casement	CNCC	5.3.6 b) The Review of Consents is welcomed. It is unclear from the draft Plans, but the review should encompass those regulated under PPC (2003) as well as those by issued by the NIEA WMU.	The process of review for consents will be discussed directly with each sector in late 2009 early 2010. In general terms consents will only be reviewed where the RBMPs have identified the waterbody is at risk of failing to meet its objective. In addition PPC licensed sites will also be affected by the review process, again where the RBMPs have identified the waterbody is at risk then action will be taken to resolve the issue	Section on Industry & other businesses has been updated.
dRBMPC on86/4	David Howard	Bangor Angling Club	Review of existing Consents in the context of lower summer flows as a result of climate change. The reliance on UKTAG is a crucial weakness and needs to be changed. The success of the RBMPs depends on adequate enforcement; the proposed "Revised Enforcement & Prosecution Policy 2009" is clearly a substantial retreat by NIEA from any reasonable enforcement regime, will give encouragement to polluters, and requires a radical re-think.	Comments are noted. The standards that have been set have been established through a UK Technical Advisory Group (UKTag) and this is supported by a number of expert working groups to establish a consistent and scientific basis for the standards. The technical standards developed have also been subject to peer review across Europe to ensure their appropriateness. Effective, robust enforcement is an essential part of NIEA's weaponry to protect the environment and increase compliance with environmental legislation.	Section on Climate Change has been updated.

Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
				<p>The creation of the Agency-wide Environmental Crime Unit and the revised enforcement policy clearly demonstrate the Agency's commitment to firm and consistent enforcement.</p> <p>The revised enforcement policy clearly states that there will be firm action taken in the case of serious offences, with pollution considered to be in this category, and indeed that the Agency continues to work to strengthen its enforcement powers.</p> <p>It should be noted that the enforcement policy encompasses NIEA's approach to the full spectrum of environmental offences, from technical breaches to serious environmental damage cases. In our role to protect the environment, we must also focus on pro-active, preventative activity to advise and support industry to implement sustainable practices and comply with legislation.</p>	

### 3.5.4 Morphology

Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
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Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
dRBM PCon2 3/150	Clair e Cock erill	Freshw ater Task Force	<ul style="list-style-type: none"> <li>• 5.8.4 fails to tell the reader what improvements will take place. The statement that “there is a need for the development of a prioritised restoration work programme for water bodies that are impacted by morphological alterations and for a competent authority to oversee the work carried out by all departments” is very unclear. The FWTF suggest the following questions should be addressed in this section: Who is going to prioritise the work? Who is the responsible authority?</li> </ul>	NIEA has subdivided the three River Basin Districts onto 26 Local Management Areas (LMAs) , which are based on sub basin catchments. Details of these areas were included as part of the supporting documentation for the consultation on the draft plans. The LMAs are being used as the level at which measures will be set and it is planned to develop action plans to implement the RBMPs in these areas. The action plans will be implemented on a three year rolling programme to allow resources to be targeted	The RBMP will include more information on the measures required to meet the objectives in each of the 26 LMAs. As part of the RBMP Implementation Programme actions plans will be developed for each LMA in liaison with stakeholder groups active in those areas.
dRBM PCon2 3/151	Clair e Cock erill	Freshw ater Task Force	<ul style="list-style-type: none"> <li>• 5.8.5 states that “we will develop further measures to address morphological impacts”. This section needs to be clearer about the actions referred to. If the measures are not explicit, comments can not be made about further actions to deliver environmental improvements</li> </ul>	Comments are noted.	Section on Freshwater Morphology has been updated.



Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
dRBM PCon2 3/152	Clair e Cock erill	Freshw ater Task Force	<ul style="list-style-type: none"> <li>• 5.8.5 also states “The DOE is undertaking a review of existing legislative controls to control physical modifications to surface waters” however the information will not be made available until the Final Plan is produced in 2009. Therefore there is no opportunity to consult on this issue and get the views of stakeholders.</li> </ul>	A review of the existing legislation relating to controls of hydromorphological impacts has been completed. This recommended the development of guidance to enhance the application of the existing legislation.	Section on Freshwater Morphology has been updated.
dRBM PCon2 3/154	Clair e Cock erill	Freshw ater Task Force	<ul style="list-style-type: none"> <li>• Section 5.8.3 Enhancement and Restoration Scheme Examples tell us of a scheme that is a construction of 670 meters of flood walls along the banks of the Ballymully River. However, such a scheme does not reflect examples given in section c) of 5.8.5 implementation of restoration measures which states re-construction of pools and removal of hard bank reinforcement/revetment, or replacement of soft engineering solution.</li> </ul>	Restoration work was associated with this scheme. Planting of trees, introduction of stone groyne etc.	Section on Freshwater Morphology has been updated.
dRBM PCon3 0/3	Davi d Knott	Belfast Harbou r Commis sioner s	A significant number of existing measures were identified during the NI Ports and Harbours workshop, these have been submitted to NIEA on a spreadsheet - (Ref: BHC PORT-GEP). There is a significant quantity of new legislation under preparation for the marine environment, this will reinforce existing and introduce additional control measures which are consistent with the aims of river basin management planning. It is important that all new legislation is consistent and does not introduce additional conflict between regulatory regimes. Major ports	This is a very useful list of additional measures, and undoubtedly this needs to be captured in Programme of Measures. The new legislation will reinforce some of these approaches, and DOE will work to ensure that there is consistency between the existing and new approaches.	Section on Marine Morphology has been updated.

Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
			<p>and Harbours such as Belfast have implemented formal programmes to ensure safety of navigation, pollution prevention and emergency response, such measures include:            Implementation of Marine Safety Management Systems to ensure compliance with the Port Marine Safety Code. Provision of pilotage and towage standards and services. Harbour Oil Spill Contingency Plans that comply with the International Convention on Oil Pollution Preparedness, Response and Co-operation (OPRC). Port waste management plans. Resgulation of DS in Harbour areas. Dredging strategy to ensure compliance with FEPA licensing requirements. DRD are currently consulting on a proposal for Port Master Planning which will take account of the environmental aspects of port development. BHC has been involved through the UK Major Ports Group (UKMPG) in developing a protocol for maintenance dredging within Natura 2000 designated sites in GB to ensure compliance with the Birds and Habitats Directives. BHC would welcome the opportunity to work with NIEA to develop such a protocol for all maintenance dredging within port limits.</p>		

Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
dRBM PCon30/4	David Knott	Belfast Harbour Commissioners	A number of measures were identified during the NI ports and Harbours Workshop; these outputs have been forwarded to NIEA WMU for consideration.	Comment is noted	Section on Marine Morphology has been updated.
dRBM PCon55/33	Jim Haughey	Ulster Angling Federation	5.8.4 In the Draft Plan it does not tell the reader what improvements will take place. To state "there is a need for the development of a prioritised restoration work programme for water bodies that are impacted by morphological alterations and for a competent authority to oversee the work carried out by all departments" means exactly what? Who is going to prioritise the work? Who is the competent authority? We need NIEA to stop stating the obvious and tell us exactly what plans they have prepared or not as the case may be to carry out these improvements.	NIEA has subdivided the three River Basin Districts onto 26 Local Management Areas (LMAs), which are based on sub basin catchments. Details of these areas were included as part of the supporting documentation for the consultation on the draft plans. The LMAs are being used as the level at which measures will be set and it is planned to develop action plans to implement the RBMPs in these areas. The action plans will be implemented on a three year rolling programme to allow resources to be targeted	The RBMP will include more information on the measures required to meet the objectives in each of the 26 LMAs. As part of the RBMP Implementation Programme actions plans will be developed for each LMA in liaison with stakeholder groups active in those areas.

Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
dRBM PCon9 3/12	CSG Meeting: Strangford and Lecale	CSG Meeting: Strangford and Lecale	Drainage Order to be included in Marine Morphology	Comment noted.	Section on Marine Morphology has been updated.

### 3.5.5 Sustainable Drainage Systems

Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
dRBMPC on12/2	Andrew Murray	Road Service	Sustainable Urban Drainage Systems (page 53) and where it is described as Sustainable Drainage Systems (page 58). Sustainable Drainage Systems is the more appropriate terminology	Comment is noted.	Section on Urban development has been updated.

Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
dRBMPC on12/3	Andrew Murray	Road Service	At pages 57/58, it is proposed that SuDS should be adopted in urban development situations, the use of adopting Suds in urban areas should not be overplayed	Comment is noted.	Section on Urban development has been updated.
dRBMPC on12/4	Andrew Murray	Road Service	It should also be noted that Roads Service would only retain maintenance responsibility for SuDS that only receive water from road drainage systems that receive water from other sources, such as roof drainage from dwellings or other buildings, in addition to road drainage, would be a matter for NIW	Comment is noted.	Section on Urban development has been updated.
dRBMPC on12/5	Andrew Murray	Road Service	In the report care needs to be exercised to ensure that the merits of SuDS in flood alleviation is not misinterpreted.	Comment is noted.	Section on Urban development has been updated.
dRBMPC on23/98	Clair e Cock erill	Freshw ater Task Force	<ul style="list-style-type: none"> <li>Under SuDS, a draft strategy is to be produced. The Taskforce request that the final Plans integrate commitments and specific targets with regards to the wider adoption of SuDS in the Programmes of Measures.</li> </ul>	The consultation document "Managing Stormwater" has been issued with a closing date of 16 October 2009. The delivery of the strategy, when agreed, will be the responsibility of a number of Departments and government agencies and local authorities.	Section on Urban development has been updated.

Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
dRBMPC on23/116	Clair e Cock erill	Freshw ater Task Force	<p>5.4 Urban Development</p> <ul style="list-style-type: none"> <li>• Clarification is required on the status of the draft SuDS guidance document, 'Managing Stormwater', which was due out for consultation in early 2009. It is commendable that greater use of SuDS is being considered, however, more information about how this will be achieved is required, i.e. what are the steps, how long will they take, what is the anticipated impact?</li> </ul>	The consultation document "Managing Stormwater" has been issued with a closing date of 16 October 2009. The delivery of the strategy, when agreed, will be the responsibility of a number of Departments and government agencies and local authorities. The steps are outlined in the Consultation Document.	Section on Urban development has been updated.
dRBMPC on23/135	Clair e Cock erill	Freshw ater Task Force	<ul style="list-style-type: none"> <li>• There is no proactive attempt to reduce industrial pollution through wider stakeholder engagement. NIEA should be promoting reuse of water, rainwater harvesting, clean/dirty water separation. NIEA should be focusing on developing detailed plans of industrial estate drainage and specific contingency plans for industrial estates and high risk businesses.</li> </ul>	Efficient use of water is encouraged through Wise use of Water in the Quarry Products Industry publication. Rainwater harvesting will also be promoted as part of the forthcoming Sustainable Drainage Strategy which is under consultation.	A new supplementary measure on promotion of water efficiency has been included in the RBMPs.
dRBMPC on68/36	Patri ck Case ment	CNCC	<p>5.4.5 a) It is extremely disappointing that the promised draft Strategy to promote SuDS in NI has not yet been published for consultation, particularly in the light of the recent extreme weather events that gave rise to domestic flooding. It is difficult to understand why there is so much reluctance to introduce SuDS techniques, which have been shown to be cheaper than hard-engineered solutions and to reduce flooding. Another area that SuDS has the potential to mitigate impact is with road salt. Roads Service use approximately 50,000 tonnes</p>	The consultation document "Managing Stormwater" has been issued with a closing date of 16 October 2009. The delivery of the strategy, when agreed, will be the responsibility of a number of Departments and government agencies and local authorities. The steps are outlined in the Consultation Document. Roads Service is committed to the implementation of SUDS on future major schemes.	Section on Urban development has been updated.

Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
			of rock salt annually, of which nearly 4000 tonnes is insoluble material that will end up in water bodies.		
dRBMPCon69/4	Stuart Wightman	DRD WPD	DRD, through Roads Service, will help with the adoption of Sustainable Drainage Systems (SuDS). Roads Service has already embedded Sustainable Drainage Systems (SuDS) into its design criteria for new major roads projects. This has led to SuDs being designed into several new major roads projects over the last few years. All new motorways, dual carriageways and improvements to roads of such standard have SuDS incorporated in their construction, where technically and economically feasible. Northern Ireland Water also adopt and maintain approved 'hard engineered SuDS' (schemes that are below ground, such as attenuation tanks) within new developments, in accordance with its sewer adoption policy and procedures.	Comment is noted.	Section on Urban development has been updated.

Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
dRBMPC on93/10	CSG Meeting: Strangford and Lecale	CSG Meeting: Strangford and Lecale	Include reference to SUDS – important part of flood control	The consultation document "Managing Stormwater" has been issued with a closing date of 16 October 2009. The delivery of the strategy, when agreed, will be the responsibility of a number of Departments and government agencies and local authorities. The steps are outlined in the Consultation Document.	Section on Urban development has been updated.

### 3.5.6 Water charging / sustainable use of water

Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
dRBMPC on10/8	Dr Bob Common	Public	Section 5 Water leakage levels can be especially bothersome. Recalls problems with water supply in the drier years of 1960 - 70 decade.	NI Water has proposed challenging leakage targets up to 2010. However NIAUR will set leakage targets for the company as part of the price review process. There already is a target to reduce leakage to half of what it was in 2001 by 2010. There is significant investment required and it will take many years to bring the water and sewerage system up to a satisfactory level.	Section on Abstraction and flow regulation has been updated.



Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
dRBMPCon14/1	John Cunningham	Public	EU Legislation, water metering is required to be available to domestic water consumers as charging mechanisms must be established in such a manner as to encourage the wise use of natural resources. A fixed charge does not do this. No mention of this measure under 'improved efficiency of use'	Ministers have not yet agreed proposals for the funding of household water and sewerage consumption. However, the cost of providing water and sewerage services to households has been identified. The bulk of non-essential or discriminatory water use occurs in the non-domestic sector and the rolling out of metering in that sector will make an impact on improving the efficient use of water resources. A number of additional measures are being taken to achieve the environmental objectives of the Water Framework Directive. Foremost is the major investment programme to upgrade water and sewerage infrastructure.	A new supplementary measure on promotion of water efficiency has been included in the RBMPs
dRBMPCon14/2	John Cunningham	Public	There is no mention of dual flush toilets or spray taps either in public or domestic facilities. There is no commitment to limit phosphates in detergents.	The Water Supply (Water Fittings) Regulations (Northern Ireland) 2009 state that: no flushing device installed for use with a WC pan shall give a single flush exceeding 6 litres; if a flushing cistern was installed before 3 August 2009 it may be replaced by a cistern which delivers a similar flush and which may be single or dual flush. However, apart from such circumstances dual flush toilets must be installed - you cannot install a single flush toilet unless it is replacing another single flush toilet. There is a UK wide measure to ban phosphates in domestic laundry detergents, which has been included in the RBMPs.	Section on Abstraction and flow regulation has been updated.  A new supplementary measure on banning phosphates has been included in the RBMPs.

Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
dRBMPCon18/6	George Butler	NI Water	There may be something more that can be done around water savings initiatives. GB has "WaterWise" – a Quango. I don't think there is the equivalent in NI.	NI Water has an economic interest in promoting water efficiency to reduce costs of abstraction, treatment and impounding, however, this is an area DRD will examine further .	A new supplementary measure on promotion of water efficiency has been included in the RBMPs
dRBMPCon18/9	George Butler	NI Water	Pg 39 – The leakage rates will need to be updated as the 135.5 mld is out of date.	NI Water has proposed challenging leakage targets up to 2010. However the leakage targets will be set by NIAUR as part of the price review process. The Economic Level of Leakage figure will be updated in conjunction with the review of the Water Resources Management Plan which is due for completion in 2010/11.	Section on Abstraction and flow regulation has been updated.
dRBMPCon23/24	Clare Cockrill	Freshwater Task Force	Have we identified the most significant pressures affecting the water environment? Whilst some of these pressures have been identified in the draft RBMPs to an extent, not all have. The list of pressures should include: Inefficient use of water combined with a lack of influence over use behaviour: As set out in Article 9 of the WFD, one of the key elements of implementation is to ensure 'that water pricing policies provide adequate incentives for users to use water resources efficiently, and thereby contribute to the environmental objectives of this Directive' by 2010. Furthermore, Art 9 continues	Ministers have not yet agreed proposals for the funding of household water and sewerage consumption. However, the cost of providing water and sewerage services to households has been identified. The bulk of non-essential or discriminatory water use occurs in the non-domestic sector and the rolling out of metering in that sector will make an impact on improving the efficient use of water resources. The DRD Minister consulted upon draft Social and Environmental Guidance for water and sewerage services. This is part of the wider Price Control process and defines priorities for investment. The Guidance takes	A new supplementary measure on promotion of water efficiency has been included in the RBMPs

Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
			to state that the planned steps towards implementing water pricing policies must be reported in the RBMPs. The current Plans do not meet these requirements. Yet it is clear that failure to do so would compromise the purposes and the achievement of the objectives of this Directive.	account of the requirements of the WFD amongst other matters. The programme of work within PC10 is based on a number of funding assumptions which will need to be finalised as part of the Executive's overall priorities.	
dRBMPCon23/65	Claire Cockerill	Freshwater Task Force	Section 5.1 The Water Framework Directive requires Member States to promote the efficient use of water by their customers. The FWTF believes that the RBMPs and the programme of measures that are listed as existing or planned do not sufficiently promote this. A key role of the RBMPs should be to educate the general public about the cost of providing high quality water to our homes, the cost of removing and treating waste water and the damaging effect that pollution has on both our water resources and the general environment.	NI Water promotes water conservation by attending major public exhibitions, hosting events at its Silent Valley Education Centre and organising educational visits to schools and communities. They also publish educational leaflets and run campaigns designed to increase awareness of the need for water conservation.	A new supplementary measure on promotion of water efficiency has been included in the RBMPs
dRBMPCon23/67	Claire Cockerill	Freshwater Task Force	While it is obvious that it will take some time to introduce universal metering (although we should be aware that the UK is one of the last European countries without universal water metering), this should be a visible, time bound and major goal. Pricing should be closely related to water consumption, with only a small percentage of the total bill being a 'standing charge' unrelated to the amount consumed. This	Ministers have not yet agreed proposals for the funding of household water and sewerage consumption. However, the cost of providing water and sewerage services to households has been identified. The bulk of non-essential or discriminatory water use occurs in the non-domestic sector and the rolling out of metering in that sector will make an impact on improving the efficient use of water resources.	A new supplementary measure on promotion of water efficiency has been included in the RBMPs

Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
dRBMPCon23/68	Claire Cockrill	Freshwater Task Force	<p>will maximise the stimulus for conservation.</p> <p>Pricing alone will not reduce individual water use. Most households, 85% of respondents to Consumer Council research, would like more information about how to save water. NI Water should support individuals who want to install water efficiency devices and appliances in their homes. Installing low flush toilets and water efficient taps and showers in the home could reduce household water consumption by 40%. Such schemes should be targeted particularly at low income and high water need households. Water should remain affordable for the majority and people must be satisfied that they are getting what they pay for. Regulators should also play their part, with all houses ultimately but perhaps restricted to new buildings initially, being subject to design principles which would enable strict water use targets (for example, a maximum water use of 100 litres per person per day) to be met: the Water Supply (Water Fittings) Regulations (NI) 2009 represent a step in the right direction in encouraging improved efficiency but will not deliver the level of water savings required to make supplies sustainable.</p>	<p>NI Water promotes water conservation by attending major public exhibitions, hosting events at its Silent Valley Education Centre and organising educational visits to schools and communities. They also publish educational leaflets and run campaigns designed to increase awareness of the need for water conservation.</p>	<p>A new supplementary measure on promotion of water efficiency has been included in the RBMPs</p>

Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
dRBMPCon23/69	Claire Cockrill	Freshwater Task Force	<ul style="list-style-type: none"> <li>If customers are to accept water and sewerage charges and embrace a culture of water efficiency they must be confident that the service provider is as cost effective and resource efficient as possible. NI Water has set a target of a reduction in leakage of 50% by 2010 compared with 2001. This sounds impressive but it still means that the company will be losing 21% of the water it has treated. This has obvious negative environmental and economic impacts given the cost - in pounds and in carbon - of treating and distributing water, but probably the largest negative aspect is the public relations impact. While there is obviously a leakage level which must be tolerated given our aging pipes, efforts should be made to tackle this to demonstrate the fundamental principle that 'water is precious and valuable'. Other European countries regularly achieve leakage rates of 10-15% and we should aspire to a similar level. Current 'economic levels of leakage' may become outmoded as the cost of electricity, and hence the cost of both treatment and transport of water, increases.</li> </ul>	<p>The level of expenditure and investment will be set by the NIAUR. NI Water has proposed challenging targets up to 2010. However NIAUR will set the leakage targets as part of the price review process. The DRD Minister has stated that social and environmental costs should be taken into account as part of the next price review period.</p>	<p>A new supplementary measure on promotion of water efficiency has been included in the RBMPs</p>

Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
dRBMPC on23/70	Claire Cockrill	Freshwater Task Force	The FWTF suggest that the Water Resources Standards for Rivers in relation to water flow rates (p.43-50) are inadequate in terms of river protection.	<p>The standards that have been set have been established through a UK Technical Advisory Group (UKTag) and this is supported by a number of expert working groups to establish a consistent and scientific basis for the standards. The technical standards developed have also been subject to peer review across Europe to ensure their appropriateness.</p> <p>Rivers Agency has 130 monitoring stations across Northern Ireland. Out of these there are approximately 100 gauging sites at which the following hydrological information either is or can be provided to NIEA.</p> <ol style="list-style-type: none"> <li>1. Continuous water level monitoring.</li> <li>2. Continuous discharge rate monitoring.</li> <li>3. Daily mean flow.</li> <li>4. Mean daily flow.</li> <li>5. Flow duration curve. (Qn95 etc )</li> <li>6. Base flow indices.</li> <li>7. Annual maximum and annual minimum discharge.</li> <li>8. Rating equations.</li> <li>9. Catchment descriptors.</li> </ol>	Section on Abstraction and flow regulation has been updated.

Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
dRBMPCon65/6	Claire Cockrill	WWF NI	<ul style="list-style-type: none"> <li>• Inefficient use of water combined with the assumption that water should be free for all;</li> <li>• Economic priorities are increasing the risk of a minimalist approach being adopted to the implementation of Water Framework Directive</li> </ul> Whilst some of these pressures have been identified in the draft River Basin Management Plans (RBMPs) to an extent, not all have. The latter two have not been fully addressed.	The Water and Sewerage Services (NI) Order 2006 places a duty on Northern Ireland Water (NIW) to promote the efficient use of water by customers. The Northern Ireland Authority for Utility Regulation (NIAUR) has the power to enforce this duty. Ministers have not yet agreed proposals for the funding of household water and sewerage consumption, however, the cost of providing water and sewerage services to households has been identified. The bulk of non-essential or discriminatory water use occurs in the non-domestic sector and the rolling out of metering in this sector will make an impact on improving the efficient use of water resources.	A new supplementary measure on promotion of water efficiency has been included in the RBMPs
dRBMPCon65/7	Claire Cockrill	WWF NI	The plans should include planned steps to introduce a water pricing policy that will facilitate price recovery, as stated in Article 9 of the Directive. Establishing a water charging mechanism that is fair and transparent in tandem with an awareness raising campaign that explains the true value of water to consumers will create an incentive for economical use of water. WWF NI refer to the Herrington report which sets out proposals for a water tariff structure which is fit for purpose, i.e. to facilitate price recovery of the costs of water services and encourage sustainable use of water while addressing the issue of affordability for all. We would urge that this an issue that needs to be	Ministers have not yet agreed proposals for the funding of household water and sewerage consumption. However, the cost of providing water and sewerage services to households has been identified. The bulk of non-essential or discriminatory water use occurs in the non-domestic sector and the rolling out of metering in that sector will make an impact on improving the efficient use of water resources.	RBMP updated to include position on Article 9 (Cost recovery and water services).

Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
			addressed and would be happy to discuss the proposals contained within this document in more detail.		
dRBMPC on68/11	Patrick Case ment	CNCC	It is felt that the majority of significant pressures have been identified in the Plans. However, there is a lack of discussion about efficiency of water use, measures to reduce consumption and water charging. Whilst politically sensitive, these measures are required by Article 9 of the Directive “that water-pricing policies provide adequate incentives for users to use water resources efficiently, and thereby contribute to the environmental objectives of this Directive,” and should be drawn through into the Plans.	The Water and Sewerage Services (NI) Order 2006 places a duty on Northern Ireland Water (NIW) to promote the efficient use of water by customers. The Northern Ireland Authority for Utility Regulation (NIAUR) has the power to enforce this duty. The bulk of non-essential or discriminatory water use occurs in the non-domestic sector and the rolling out of metering in this sector will make an impact on improving the efficient use of water resources. Ministers have not yet agreed proposals for the funding of household water and sewerage consumption, however, the cost of providing water and sewerage services to households has been identified.	RBMP updated to include position on Article 9 (Cost recovery and water services).
dRBMPC on68/17	Patrick Case ment	CNCC	More efforts need to be made to reduce water consumption. There needs to be an active campaign to promote techniques such as SuDS, separation of clean and dirty water, water reuse and rainwater harvesting. Furthermore, these methods should be incorporated as planning requirements, so that the full costs are borne by	The bulk of non-essential or discriminatory water use occurs in the non-domestic sector and the rolling out of metering in that sector will make an impact on improving the efficient use of water resources. NI Water promotes water conservation by attending major public exhibitions, hosting events at its Silent Valley Education Centre and	A new supplementary measure on promotion of water efficiency has been included in the



Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
			the polluter.	organising educational visits to schools and communities. They also publish educational leaflets and run campaigns designed to increase awareness of the need for water conservation. DRD Roads Service has already embedded Sustainable Drainage Systems (SuDS) into its design criteria for new major roads projects. All new motorways, dual carriageways and improvements to roads of such standard have SuDS incorporated in their construction, where technically and economically feasible. NI Water also adopt and maintain approved 'hard engineered SuDS' (schemes that are below ground, such as attenuation tanks) within new developments, in accordance with its sewer adoption policy procedures. The consultation document "Managing Stormwater" has been issued with a closing date of 16 October 2009. The delivery of the strategy, when agreed, will be the responsibility of a number of Departments and government agencies and local authorities.	RBMPs.
dRBMPCon70/1	Shay Murtagh Ltd.	Shay Murtagh Ltd.	WFD Rainwater Harvesting Paper	Paper noted. The Rainwater harvesting systems – Code of practice produced by the British Standards Institution (BSI) presents standards for the on site collection and use of rainwater as an alternative to public mains water for a variety of non-potable water uses in the home, workplace and garden.	Section on Abstraction and flow regulation has been updated.

Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
dRBMPCon72/18	Aileen Lawson	UFU	The UFU would like NIEA to investigate the possibility of introducing a simple standard cost grant scheme to encourage householders, businesses and agriculture to harvest rainwater through the provision of funding for collection tanks. The UFU feels that this would encourage the more efficient use of water and may become even more relevant in the future as the climate changes.	Such a scheme would be a good idea. NIEA would not be in a position to provide this funding. Rainwater harvesting will be promoted as part of the forthcoming Sustainable Drainage Strategy which is under consultation. Farm businesses can apply to the Farm Modernisation Programme under the NI Rural Development Programme for funding for Rainwater harvesting equipment.	Section on Urban development has been updated.
dRBMPCon94/16	CSG Meeting: Belfast Lough and Lagan	CSG Meeting: Belfast Lough and Lagan	New building regulations – toilets, rainwater usage, water rates, meters would solve, charge, typically 10-15%	NI Water promotes water conservation by attending major public exhibitions, hosting events at its Silent Valley Education Centre and organising educational visits to schools and communities. They also publish educational leaflets and run campaigns designed to increase awareness of the need for water conservation.	Section on Abstraction and flow regulation has been updated. A new supplementary measure on promotion of water efficiency has been included in the RBMPs

Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
dRBMPC on94/17	CSG Meeting: Belfast Lough and Lagan	CSG Meeting: Belfast Lough and Lagan	'Grey water', home improvements e.g. smart time meter. Usage – 'next generation'	Comment is noted. NI Water promotes water conservation by attending major public exhibitions, hosting events at its Silent Valley Education Centre and organising educational visits to schools and communities. They also publish educational leaflets and run campaigns designed to increase awareness of the need for water conservation.	A new supplementary measure on promotion of water efficiency has been included in the RBMPs

### 3.5.7 Protected Areas

Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
dRBMPC on1/5	John Martin	RSPB NI	How will the River Basin Management Plans help deliver Favourable Conservation Status on all Natura 2000 sites in all River basin Districts by 2015?	The draft River Basin Management Plans have identified relevant Natura sites as Protected Areas. This means that the achievement of the water-related standards and objectives for those sites are an objective of the river basin management planning process. It does not, however, mean that the achievement of non water-related standards and objectives for the sites will be delivered through the river basin planning process. For example, intrusive	Section on Protected Areas has been updated.

Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
				<p>land-based activities may disturb wildfowl nesting at the water's edge even though the water status needs of the wildfowl are achieved.</p> <p>Information on the location of the Natura sites along with associated water bodies and objectives can be accessed via the "River Basin Plan Interactive Map" which can be located at the following address: <a href="http://maps.ehnsi.gov.uk/wmuviewer/">http://maps.ehnsi.gov.uk/wmuviewer/</a> . Further information on how the Department has identified water dependent Natura Protected Areas can be accessed from the following UKTAG (UK Technical Advisory Group) guidance paper (<a href="http://www.wfduk.org/tag_guidance/Article_06-07/TAG2003%20%20WP4a%20%28PR03%29">http://www.wfduk.org/tag_guidance/Article_06-07/TAG2003%20%20WP4a%20%28PR03%29</a> <a href="http://www.wfduk.org/tag_guidance/Article_06-07/TAG2003%20%20WP4a%20%28PR03%29">http://www.wfduk.org/tag_guidance/Article_06-07/TAG2003%20%20WP4a%20%28PR03%29</a> ).</p> <p>In terms of the deadline for meeting Favourable Conservation Status the Department's view is that in circumstances where the Protected Area deadline, for achieving standards and objectives, is not specified in the Community legislation under which the area was established e.g. Habitats and Birds, then the deadline imposed by the Water Framework Directive is 22nd December 2015. However it is the Department's view that the provisions specified in Article 4.4 of the Directive apply in those circumstances. Further information can be accessed from the following UKTAG guidance paper</p>	

Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
				<a href="http://www.wfduk.org/tag_guidance/Article_06-07/guidance_protected_areas">http://www.wfduk.org/tag_guidance/Article_06-07/guidance_protected_areas</a> )	
dRBMPCon1/7	John Martinn	RSPB NI	<p>In requesting information for plans that help deliver favourable conservation status (all of the sites in all of the RBDs). 'NIEA's aim of having all ASSI site selection features in Favourable or Unfavourable Recovering condition by 2016' is commendable. However NI will face infraction if favourable conservation status is not delivered by 2015 in all water dependant N2K sites as dictated by the EC WFD Article 4 (which takes precedent over existing legislation for protected areas).</p> <p>Can you please confirm whether NIEA has plans in place within the DRBMP to help deliver favourable conservation status of water based N2k sites by 2015?</p>	NIEA have now identified supplementary measures where required for water dependent Natura 2000 sites.	Section on Protected Areas has been updated.
dRBMPCon23/37	Claire Cockrill	Freshwater Task Force	<p>Measures for ensuring that water dependent Natura 2000 sites achieve favourable conservation status by 2015 have not been identified. Article 4.1 C of the WFD (2000/60/EC) states the following:</p> <p>(c) for protected areas Member States shall</p>	NIEA have now identified supplementary measures where required for Natura 2000 sites.	The RBMP will include more information on the measures

Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
			achieve compliance with any standards and objectives at the latest 15 years after the date of entry into force of this Directive, unless otherwise specified in the Community legislation under which the individual protected areas have been established.		required to meet the objectives in each of the 26 LMAs. As part of the RBMP Implementation Programme actions plans will be developed for each LMA in liaison with stakeholder groups active in those areas.
dRBMPCon23/43	Claire Cockerill	Freshwater Task Force	Information for the SAC/SPAs has not been made available, preventing relevant stakeholders from ensuring the correct problems and remedies have been identified. This, again, is a major down fall and runs the risk of placing Northern Ireland in a position where objectives of the WFD will not be met, leading to inevitable infraction proceedings. These areas include some of the most important conservation sites in NI as designated under EU legislation and plans to realise WFD requirements in these areas	NIEA supply information on designated sites to whoever needs it. However, as stated above, there is still work to be done by NIEA in indentifying and empowering all the relevant stakeholders who can assist in delivering favourable conservation status. NIEA have now identified supplementary measures where required for Natura 2000 sites.	The RBMP will include more information on the measures required to meet the objectives in each of the 26 LMAs. As

Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
			should be a priority.		part of the RBMP Implementation Programme actions plans will be developed for each LMA in liaison with stakeholder groups active in those areas.
dRBMPCon23/45	Claire Cockrill	Freshwater Task Force	<p>Water Protection Zones should be made available wherever they are needed and prioritised using the following criteria:</p> <ul style="list-style-type: none"> <li>• Where there is clear evidence that agricultural pollution is the cause of failure with the specific target areas of Natura 2000 sites, where diffuse pollution or hydro-morphological pressures are having an impact;</li> <li>• Where ASSIs classified as water bodies are in unfavourable condition;</li> <li>• Priority habitats and species under UK and NI biodiversity processes.</li> </ul>	<p>NIEA holds the results of designated site condition assessment monitoring surveys. Improving the condition of sites that are unfavourable, whether water or terrestrial sites, is likely to require a number of different methodologies and approaches, and the participation of various stakeholders.</p> <p>NIEA have now identified supplementary measures where required for Natura 2000 sites.</p> <p>It is planned, subject to funding, to develop catchment models to assess the impacts of both point source and diffuse pollution pressures. These models will be used to quantify, where possible, the improvements in status resulting from current (basic) measures.</p>	The RBMP will include more information on the measures required to meet the objectives in each of the 26 LMAs. As part of the RBMP Implementation Programme

Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
					actions plans will be developed for each LMA in liaison with stakeholder groups active in those areas.
dRBMPCon65/11	Claire Cockerill	WWF NI	In addition, measures for ensuring that Protected Areas achieve favourable status by 2015 have not been identified. These areas include some of the most important conservation sites in NI as designated under EU legislation and plans to realise WFD requirements in these areas should be a priority. WWF-NI emphasise the importance of completing all outstanding bodies of work in time for inclusion in a stakeholder consultation process	NIEA is currently developing a policy to bring 95% of designated site selection features into Favourable or Unfavourable Recovering condition by 2016, as required by the Sustainable Development Strategy for Northern Ireland 2006. NIEA will consult with all relevant stakeholders in order to both develop the final policy and to deliver its implementation. The River Basin Management Plans will be one of a number of mechanisms to deliver appropriate site management in line with site Conservation Objectives. NIEA have now identified supplementary measures where required for Natura 2000 sites.	The RBMP will include more information on the measures required to meet the objectives in each of the 26 LMAs. As part of the RBMP Implementation Programme actions plans will be developed for each LMA in liaison with



Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
					stakeholder groups active in those areas.
dRBMPCon66/17	Andrew McDowell	National Trust	More detailed measures for water-dependent ASSIs should be included in the final plans.	NIEA has subdivided the three River Basin Districts onto 26 Local Management Areas (LMAs) , which are based on sub basin catchments. Details of these areas were included as part of the supporting documentation for the consultation on the draft plans. The LMAs are being used as the level at which measures will be set and it is planned to develop action plans to implement the RBMPs in these areas. The action plans will be implemented on a three year rolling programme to allow resources to be targeted. Water dependent ASSIs will be included as part of the LMA action plans.	The RBMP will include more information on the measures required to meet the objectives in each of the 26 LMAs. As part of the RBMP Implementation Programme actions plans will be developed for each LMA in liaison with stakeholder groups active in those areas.

Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
dRBMPCon68/24	Patri ck Case ment	CNCC	It is very disappointing that compliance with the Habitats Directive has not been assessed in 3 areas and in 5 areas for the Birds Directive, with no indication of when this will be remedied. How can measures be prioritised when the assessment has not been completed? Also, it is felt there should be mention of Council Regulation (EC) No 1100/2007 of 18 September 2007 establishing measures for the recovery of the stock of European eel	The Habitats Directive Article 6 Assessments, for each RBD, are available from the POM pages of the website. The European Eel Regulation was covered in Section 5.11.3 of the draft plans. NIEA have now identified supplementary measures where required for Natura 2000 sites.	Section on Fisheries has been updated.

### 3.5.8 Comments on specific catchments

Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
dRBMPCon11/13	Keady District Angling Club	Keady District Angling Club	Phosphate and nitrate use on agricultural land surrounding Lowry's Lake on the Hamiltonsbawn's road outside Armagh has been a particularly difficult issue. Armagh angling club own Lowry's Lake and the water extracted from here is used to run our hatchery. Since 1198-99 the lake has been suffering massive weed blooms and algal blooms which completely clog	Issue is noted. Eutrophication, arising from too much nitrate and phosphorus entering the water, is the most widespread pollution problem facing Northern Ireland's water environment and it causes the algal growth referred to by the angling club. On 1 January 2007, the following measures were introduced in Northern Ireland to help address these problems:	The RBMP will include more information on the measures required to meet the objectives in each of the 26

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			<p>the water making angling virtually impossible from May until approximately September. The knock on effects of this are that the oxygen levels are depleted which has had a bad effect on our hatchery with several large fish kills due to low saturated oxygen levels in the water. In late autumn when the weed begins to rot we again face a problem with low oxygen levels in the water and excess nutrients. We believe our club membership numbers have dropped in recent years due to eutrophication. Perhaps the dept of Agriculture could link in with Riparian land owners and advise them accordingly regarding the use of fertilisers.</p>	<p>(1) the Nitrates Action Programme Regulations (Northern Ireland) 2006 (the NAP Regulations) containing a programme of measures to reduce or prevent the pollution of waters caused by the application and storage of inorganic fertiliser and manure on farmland. (2) the Phosphorus (Use in Agriculture) Regulations (Northern Ireland) 2006 (Phosphorus Regulations) which control the application of chemical phosphorus fertiliser to land. Both sets of Regulations are administered by Northern Ireland Environment Agency (NIEA) and apply to all farmers across Northern Ireland. The Nitrates Directive is a basic measure under the EC Water Framework Directive (WFD) and the delivery of action under the NAP Regulations will play a key role in meeting the WFD water quality objectives and water quality generally. Habitat enhancement options under NICMS include 'Farm waterway and riparian zone management' and 'Riverbed enhancement.' NIEA plans to focus its resources on priority catchments, typically areas where for example there are high levels of diffuse pollution from a range of sources including impacts from agriculture..</p>	<p>LMAs. As part of the RBMP Implementation Programme actions plans will be developed for each LMA in liaison with stakeholder groups active in those areas</p>
dRBM PCon2 3/27	Claire Cockrill	Freshwater Task Force	<p>The impacts of these pressures locally have not been considered and each RBMP identifies the same significant pressures. Many water issues are prevalent across Northern Ireland but have varying impacts because of geographical differences across and within catchments.</p>	<p>NIEA has subdivided the three River Basin Districts onto 26 Local Management Areas (LMAs), which are based on sub basin catchments. Details of these areas were included as part of the supporting documentation for the consultation on the draft plans. The LMAs are being used as the level at</p>	<p>The RBMP will include more information on the measures required to meet the</p>

Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
			<p>Furthermore, the summary report of the characterisation analysis submitted to the EC in March 2005 indicates the geographical differences in the water issues in Northern Ireland.</p> <p>Better cost effectiveness will be achieved by addressing problems at catchment level, including taking into account whether the pressures come from urban or rural sources, where specific pressures can be tackled using the most suitable approaches.</p>	<p>which measures will be set and it is planned to develop action plans to implement the RBMPs in these areas. The action plans will be implemented on a three year rolling programme to allow resources to be targeted.</p>	<p>objectives in each of the 26 LMAs. As part of the RBMP Implementation Programme actions plans will be developed for each LMA in liaison with stakeholder groups active in those areas.</p>
dRBM PCon6 3/1	John Kelpie	Derry City Council	<p>Agree that the objectives are appropriate for the first cycle and projected for 2021 and 2027. These are in line with Aim 2 as set out in the Derry/Londonderry Local BAP to conserve priority habitats and species in the area. As part of this plan rivers and streams and the Inner Lough Foyle are examined in more detail. Currently we are developing, with the Derry and District Biodiversity Partnership, detailed Habitat and Species Action plans that identify potential projects in the area that will help conserve and enhance water bodies in the DCC area and beyond. Any projects that arise from these will contribute to the achievement of objectives as set out in the draft River Basin Management Plan.</p>	<p>Comment is noted. The objectives have been reviewed using the 2009 status classification data and will be presented in the RBMP.</p>	<p>Classification data updated to show classifications for 2009. Objectives have been updated accordingly.</p>

Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
dRBM PCon6 3/7	John Kelpie	Derry City Council	If resources allow, using the Ballinderry River Enhancement Scheme model, RIPPLE, would work at a community level. Again by tapping into existing forums such as the Derry and District Biodiversity Partnership other opportunities can be identified.	Comment is noted. The Department has had some involvement in this project and will consider how the approach could be adapted for the development and implementation of LMA actions plans. The Department is also working with the Association of River Trusts with a view to facilitating the establishment of further River Trusts in Northern Ireland	A new measure to facilitate the establishment of River Trusts has been included in the RBMPs
dRBM PCon6 5/9	Clair Cockrill	WWF NI	In addition, the impact of these pressures locally has not been considered and each RBMP identifies the same significant pressures. Many water issues are prevalent across Northern Ireland but have varying impacts because of geographical differences across and within catchments. Furthermore, the summary report of the characterisation analyses submitted to the EC in March 2005 indicates the geographical differences in the water issues in Northern Ireland. Better cost effectiveness will be achieved by addressing problems at catchment level, including taking into account whether the pressures come from urban or rural sources.	NIEA has subdivided the three River Basin Districts into 26 Local Management Areas (LMAs), which are based on sub basin catchments. Details of these areas were included as part of the supporting documentation for the consultation on the draft plans. The LMAs are being used as the level at which measures will be set and it is planned to develop action plans to implement the RBMPs in these areas. The action plans will be implemented on a three year rolling programme to allow resources to be targeted.	The RBMP will include more information on the measures required to meet the objectives in each of the 26 LMAs. As part of the RBMP Implementation Programme actions plans will be developed for each LMA in liaison with stakeholder groups active in those areas.

Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
dRBM PCon7 2/22	Aileen Lawson	UFU	The UFU believes that more farmers are likely to get involved in Catchment Stakeholder Groups during the implementation stage of the RBMPs and when activities are developed at a more local level.	Comment is noted. As part of the RBMP Implementation Programme actions plans will be developed for each LMA in liaison with stakeholder groups active in those areas.	The RBMP will include more information on the measures required to meet the objectives in each of the 26 LMAs. As part of the Implementation Programme action plans will be developed for each LMA in liaison with stakeholder groups active in those areas.
dRBM PCon8 4/1	Cllr Cadoogan Enright	Down District Council	In reference to the recent NIEA Draft plans - the work of the Quoile Catchment Working Group shows that the Quoile estuary should not be listed as 'moderate', but as 'bad'. I hope this can be changed to reflect the input of the Quoile Catchment Working Group Meetings.	The full details behind the classification of the Quoile Pondage are detailed in a pamphlet which can be found at <a href="http://www.ni-environment.gov.uk/quoilepondage_pamphlet_draft_rbmp_dec2008.pdf">www.ni-environment.gov.uk/quoilepondage_pamphlet_draft_rbmp_dec2008.pdf</a> This was a preliminary classification based on limited data. The next classification will be completed using a fuller dataset. The Quoile Pondage is a heavily modified water body, and quality will be assessed in terms of ecological potential. A 'moderate' designation is a failure to meet good status or good ecological	Classification data updated to show classifications for 2009.

Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
				<p>potential and as such, requires management action.</p> <p>The classification will be reworked for the final RBP in terms of ecological potential. It will not meet good ecological potential, and will therefore require management action to address problems. The action plan will be developed by the Quoile Working Group. Minutes of this Group will be uploaded onto the NIEA Website to track developments in this area.</p>	
dRBM PCon9 0/13	Clerk to the Environment Committee & Committee for Regional Development	Committee for Regional Development and Environment Committee	<p>The view that the Plans are not specific enough was echoed by a second organisation in this sector, which was of the view that managing water bodies at a catchment level is needed. It stated that Northern Ireland has nine different catchment areas however the Plans present this as three large areas. This group was concerned at this approach, citing Article 4.1C of the WFD, and was of the view that, in Northern Ireland, there were too many unfavourable areas with no plans to improve their status by 2015.</p>	<p>NIEA has subdivided the three River Basin Districts into 26 Local Management Areas (LMAs), which are based on sub basin catchments. Details of these areas were included as part of the supporting documentation for the consultation on the draft plans. The LMAs are being used as the level at which measures will be set and it is planned to develop action plans to implement the RBMPs in these areas. The action plans will be implemented on a three year rolling programme to allow resources to be targeted.</p>	<p>The RBMP will include more information on the measures required to meet the objectives in each of the 26 LMAs. As part of the RBMP Implementation Programme actions plans will be developed for each LMA in liaison with stakeholder groups active in those areas.</p>

### 3.5.9 Collection and treatment of sewage

Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
dRBM PCon1 4/4	John Cunningham	Public	Combined sewage systems. Acknowledging the problem 5.4.2, I note no effort to quantify the extent of combined sewage systems, nor any commitment to separate them. Lisnaskea has a combined system	Comment is noted. New developments are now served by separate sewerage systems although in some areas these feed into older parts of the network which may be combined. NIEA encourages the use of sustainable drainage systems that are intended to slow down the rate at which rainfall enters the drainage system.	Section on Urban development has been updated.
dRBM PCon1 8/5	George Butler	NI Water	Add SuDs? Add NIEA existing role in regulating and enforcing (if necessary) on privately owned WWTWs and Septic Tanks	Under the Water (Northern Ireland) Order 1999, it is an offence to discharge trade or sewage effluent to any waterway or water contained in any underground strata without the consent of NIEA. Discharge consents lay down conditions relating to the quality and quantity of effluent that may be discharged. Privately owned septic tanks and wwtws are regulated by NIEA under this legislation. NIEA operates a system whereby compliance with this type of consent is assessed on a 95-percentile basis, ie a permitted number of exceedences are permitted based on frequency of sampling. The use of a 95-percentile compliance assessment means that a discharge must be within its consent conditions 95% of the time. This gives NIEA statistical confidence that enforcement action will not be taken as the result of a discharge being wrongly declared non-compliant. NIEA will take enforcement action against any dischargers found to be in breach the 95 percentile, or when a gross exceedence is noted (5x consent limit for any	Section on Collection and treatment of sewage has been updated to reflect this comment.



Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
				sanitary parameter).	
dRBM PCon2 3/99	Claire Cockerill	Freshwater Task Force	<ul style="list-style-type: none"> <li>Information about the timescales related to NI Water's 'Bag it and Bin it' Campaign should be included to clarify whether this is an ongoing project.</li> </ul>	The "Bag it and Bin it" campaign will be an ongoing exercise with Education Officers actively engaging with schools, hospitals, nursing homes, libraries and community groups. NI Water has also participated in a beach clean up awareness exercise. Further information on the campaign can be obtained from the NI Water website: <a href="http://www.niwater.com">www.niwater.com</a>	Section on Waste has been updated to reflect this comment.

Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
dRBM PCon2 3/100	Clair e Cock erill	Freshw ater Task Force	<ul style="list-style-type: none"> <li>Northern Ireland should implement a P ban from detergents and this should not just focus on fabric detergents but also other domestic detergent use e.g. dishwasher tablets.</li> </ul>	DOE supports the UK view on banning P in domestic laundry detergents to reduce nutrient loading entering the water environment. This will take effect from 2015. DOE understands the need for a ban of P from eg dishwasher tablets will be kept under a review as there are technical issues to be addressed.	The ban has been included as a supplementary measure.
dRBM PCon2 3/101	Clair e Cock erill	Freshw ater Task Force	<ul style="list-style-type: none"> <li>Section 5.3.4 states that information will be provided to developers to direct development to areas where there is available capacity and 'where this is not possible' investment in creating additional capacity will be planned. Further information about the circumstances this statement referred to would be helpful. The Taskforce suggests that development should be actively limited in areas where connection capacity has been reached.</li> </ul>	It is proposed to identify the capacity of a river catchment to receive waste water discharges treated to industry best practice standards. This will be achieved through looking at catchments as a whole and identifying the impact on individual discharges. This will identify areas which cannot take any further development without the resulting waste water discharges requiring a level of treatment which would not be feasible, technically or economically. This information would inform the development of Area Plans.	Included as a supplementary measure
dRBM PCon2 3/103	Clair e Cock erill	Freshw ater Task Force	<ul style="list-style-type: none"> <li>Section 5.3.5 does not explain how the aforementioned measures will help to meet WFD objectives. There is no attempt to measure the impact of investment by NIW in terms of reduced pollution output.</li> </ul>	Improvements to the WWTW and networks will improve water quality in these areas. These areas were chosen on the basis of overloaded works and networks and areas of most concern.	The WWTW to be upgraded under the NIW PC10 investment Plan have been included in the RBMP.

Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
dRBM PCon23/105	Clair e Cockerill	Freshwater Task Force	<ul style="list-style-type: none"> <li>5.3.6 discusses actions that 'can' be taken as opposed to those that 'will' be taken; therefore, it is not evident about how much these further actions will add.</li> </ul>	Comment is noted.	Supplementary measures have been clearly set out in the RBMP.
dRBM PCon93/11	CSG Meeting: Strangford and Lecale	CSG Meeting: Strangford and Lecale	3.1 Private septic tanks need to be included. Enforcement of Water Order should be listed as a measure. Include private septic tank issue, no NIW plans for NIW to take on. See 5.3.6 c.	Section on Collection and Treatment of Sewage has been updated to reflect this comment.	Section on Collection and Treatment of Sewage has been updated to reflect this comment.

### 3.5.10 Agriculture

Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
dRBM PCon2 3/78	Claire Cockerill	Freshwater Task Force	5.2 Agriculture• The quality of water in our rivers, lakes and wetlands profoundly affects the wildlife, industries and society they support. To maintain existing water and wetland habitats, good water quality is essential. In places, pollution from sewage discharges, industrial wastes, and diffuse pollution from urban and agricultural run-off is taking a serious toll. A recent report to the European Commission indicated that diffuse pollution from agricultural sources was one of the most common causes of surface and ground water bodies being at risk of failing WFD objectives <sup>1</sup> .	Comment is noted. NIEA plans to focus its resources on priority catchments, typically areas where for example impacts from a range of sources including agriculture where there are high levels of diffuse pollution.	As part of the RBMP Implementation Programme actions plans will be developed for each LMA

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dRBM PCon2 3/80	Claire Cockerill	Freshwater Task Force	<ul style="list-style-type: none"> <li>Diffuse pollution from agriculture is one of the biggest challenges to meeting the objectives of the WFD. Considering the effects of the recent CAP reforms on farm practices, there are diverse options and 'windows of opportunity' available in both the water and agricultural sectors to link both policy fields. The EU CAP Health Check, for example, identified water quality as one of the major challenges alongside bio-fuels, climate change and biodiversity decline. This, in part, highlights the severity of the problem. However, this also presents the industry with an opportunity to help deliver high quality 'public goods'/ecosystem services for communities in Northern Ireland.</li> </ul>	DARD agri-environment schemes aim to deliver high quality 'public goods/ecosystem services for communities in Northern Ireland by improving the environment and the countryside through land management. One of the NICMS aims is to assist in the implementation of the Water Framework Directive. Effective pollution control is central to the scheme and a number of water specific management options are contained in the scheme. There were specific measures in the draft plan to address diffuse pollution.	Section on Agriculture has been updated. The RBMP includes diffuse pollution measures.

Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
dRBM PCon2 3/82	Clair e Cock erill	Freshw ater Task Force	<ul style="list-style-type: none"> <li>Estimates show that 94% of rivers, 83% of lakes and 55% of coastal water bodies are at risk from diffuse and point source pollution. Farms cover about 70% of the land area; therefore this sector has a major role in the protection and improvement of the environment, with over a million hectares used for agricultural production. Diffuse and point source pollution from agriculture arises from nutrient leaching to groundwater or runoff into surface waters, organic matter or faecal pathogens washed from yards or direct access to water ways by cattle or sheep, toxic substance spillage or inappropriate disposal and sediment loss through soil erosion.</li> </ul>	Comment is noted. NIEA plans to focus its resources on priority catchments, typically areas where for example impacts from a range of sources including agriculture where there are high levels of diffuse pollution	As part of the RBMP Implementation Programme actions plans will be developed for each LMA. These include measures to address diffuse pollution.
dRBM PCon2 3/86	Clair e Cock erill	Freshw ater Task Force	<ul style="list-style-type: none"> <li>The FWTF commends the setting of total territory approach under the Nitrates Directive. We still believe, however, that many areas in Northern Ireland are suffering more from the effects of diffuse pollution than others. While the Nitrates Directive should continue in its current form, we also believe that nutrient sensitive areas should benefit from an increasingly targeted approach. We believe this can be delivered through the existing mechanism of Agrienvironment schemes; Habitat enhancement options including farm waterway and riparian zone management, field boundary restoration and riverbed enhancement can all help the water quality and biodiversity of waterways. Recent</li> </ul>	NIEA plans to focus its resources on priority catchments, typically areas where for example impacts from a range of sources including agriculture where there are high levels of diffuse pollution. All NICMS participants with suitable waterways are encouraged to include water management options in their agreements. However, targeting farms for NICMS is not straightforward as prioritisation takes place. Applicants are prioritised according to the environmental features on the farm. These procedures have been agreed by the Environmental sub-group of the RDP monitoring committee.	The RBMP will include more information on the measures required to meet the objectives in each of the 26 LMAs. As part of the RBMP Implementation Programme actions plans will be developed for

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			<p>additions of Special Environmental Projects to the NICMS are another potential mechanism for delivery with already available funding of around £17 million. Options include water protection projects that can be carried out in cooperation with other farmers. The FWTF believes that NIEA and the DARD Countryside Management Branch (CMB) should be pro-active in seeking farmers in nutrient sensitive areas to carry out such programmes.</p>		<p>each LMA in liaison with stakeholder groups active in those areas</p>
dRBM PCon2 3/89	Clair e Cock erill	Freshw ater Task Force	<p>• None of the dRBMPs acknowledge the public goods that farming can provide for water quality. These include:</p> <ul style="list-style-type: none"> <li>• The protection and restoration of habitats and species</li> <li>• The protection of key land, soil and water resources needed for food production and functioning ecosystems e.g. nutrient recycling, soil protection, clean water;</li> <li>• The provision of ecosystem services such as water catchment and storage in wetlands, carbon sequestration and storage in agricultural soils;</li> <li>• The maintenance of valued cultural and historic landscapes;</li> <li>• Provision of amenities for public access, recreation and enjoyment;</li> <li>• The maintenance of rural culture (including traditional land management skills).</li> </ul> <p>We believe that these public goods are above and beyond what the market can deliver and need to be acknowledged within the dRBMPs.</p>	Comments are noted.	<p>Section on Agriculture has been updated to reflect this comment.</p>

Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
dRBM PCon2 3/90	Clair e Cock erill	Freshw ater Task Force	<ul style="list-style-type: none"> <li>There is no mention of managing marginal areas, and there is a risk that severely disadvantaged areas in particular could be neglected. In the context of uplands, there is particular interest in the role, for example, of peatland soils in storing carbon to mitigate against climate change or managing habitats to store water and prevent flooding in downstream urban areas or improve water quality. Dealing with water quality at the source will be less expensive than processing and filtration close to urban areas. There is potential for this to be delivered through LFA payments, which are currently under review. Raisin et al (1997) conclude that the cumulative interception of nutrients by strategically located small wetlands high up in catchments, during large storm events, is greater than larger, downstream structures<sup>1</sup>. For more information on constructed wetlands see section 5.8.</li> </ul>	Comment noted. The NAP Regulations, the Phosphorus Regulations, the Groundwater Regulations and the Water Order etc. deal with pollution at source. NIEA have developed a design manual for constructed wetlands for use under certain agricultural situations as natural treatment systems. The Water Environment (Floods Directive) Regulations ( Northern Ireland ) 2009 legislation which is currently out for consultation and makes reference to such issues as land use, soil and water management, and the environmental objectives of Article 4 of the Water Framework Directive.	A new measure on the effectiveness of wetlands in the reduction of nutrient loadings has been included in the RBMPs



Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
dRBM PCon2 3/91	Claire Cockerill	Freshwater Task Force	<ul style="list-style-type: none"> <li>The RSPB, WWF and Water UK have invested in a project to model the effects of land use change on diffuse pollution. This work is being carried out because we believe that land use change could be the only way to significantly reduce diffuse pollution in some catchments. In particular, the project is focusing on the development of land-use change scenarios that allow the achievement of WFD targets in 2015, and support the delivery of other environmental and societal goods. The following types of land-use change could, in our opinion make significant contributions to sustainable rural development and the management of diffuse agricultural pollution: The creation of riparian and lake protection areas, and protection zones around drinking water bodies, with extensive land uses. These zones could encompass the recreation of floodplain wetlands and woodland (meeting biodiversity targets and providing areas for recreation and tourism) and provision of flood storage capacity to reduce risks to homes and people. Conversion to mixed farming systems which recycle nutrients, produce local, high quality food and deliver wildlife habitats and endangered species.</li> </ul>	The Water Environment ( Floods Directive ) Regulations ( Northern Ireland ) 2009 legislation which is currently out for consultation and makes reference to such issues as land use, soil and water management, and the environmental objectives of Article 4 of the Water Framework Directive. The potential for this type of approach is recognised. NIEA has agreed to be represented on a pilot project that River's Agency are leading on to consider the use of flood plain wetlands as part of the implementation of the Floods Directive.	Section on Abstraction and Flow regulation has been updated.

Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
dRBM PCon2 3/155	Claire Cockerill	Freshwater Task Force	<ul style="list-style-type: none"> <li>• Rapid removal of water from farmland can have a variety of environmental consequences. In some locations, intense, short duration rainfall can cause local flooding because of excessive drainage and run-off from agricultural land, leading to transportation of silt into water courses, hitherto, diffuse pollution. Serious erosion by surface run-off of water because of degraded soil occurs on at least 12% of the total European land area. While slope is a major factor, erosion can occur on slopes as shallow as 2°. On grasslands which dominate NI landscape, overgrazing and poaching prevent vegetation from binding the soil, and can therefore increase soil erosion risk. In future, climate change could exacerbate the risk of soil erosion, if rainfall events become more erratic and storms more frequent. The past three summers in Northern Ireland have seen two 50 year storm events which lead to significant flooding on farm land. The FWTF urges NIEA to use the AFBI and CAFRE farms to deliver pilot projects to show solutions to the problems addressed above. For example, the construction or reconstruction of small wetlands in diffuse pollution and flood pressure areas. A network of small wetlands could act as holding areas which could store and slowdown flow to allow suspended solids to settle out. SuDS have been widely deployed in urban situations to mitigate</li> </ul>	<p>Comments noted. NIEA have developed a design manual for constructed wetlands for use under certain agricultural situations as natural treatment systems. NIEA have continue to work with DARD on the appropriate siting, operation and maintenance of constructed wetlands. They are not suitable for all situations in terms of location or what they are used to treat. The Water Environment ( Floods Directive ) Regulations ( Northern Ireland ) 2009 legislation which is currently out for consultation and makes reference to such issues as land use, soil and water management, and the environmental objectives of Article 4 of the Water Framework Directive.</p>	<p>Section on Agriculture has been updated to reflect this comment. A new measure on the effectiveness of wetlands in the reduction of nutrient loadings has been included in the RBMPs.</p>

Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
			<p>against pollution. Some of the key features of SuDS have been tested on farmland in measures known as small constructed wetlands (SCW). The key features of SCW allows water to flow through macrophyte vegetation or intercepting water in a pond structure, flow rate is reduced and capacity for settlement of suspended material is increased. Constructed wetlands of similar size relative to catchment can also reduce loss of pesticides, to values regarded as non-toxic for aquatic life, through processes such as adsorption to soil particles and organic matter, sedimentation of particles and biodegradation of nitrogen rich pesticides.</p>		
dRBM PCon2 3/156	Claire Cockerill	Freshwater Task Force	<ul style="list-style-type: none"> <li>• SCW can also provide a sustainable way to recycle valuable nutrients, such as phosphorus to farming land, when pond sediments are spread on the surrounds after dredging. This is also necessary to protect water resources in the long term, as nitrogen retention, for example, decreases with wetland age<sup>12</sup>.</li> </ul>	<p>Comments noted. NIEA have developed a design manual for constructed wetlands for use under certain agricultural situations as natural treatment systems. NIEA have continue to work with DARD on the appropriate siting, operation and maintenance of constructed wetland. They are not suitable for all situations in terms of location or what they are used to treat.</p>	<p>A new measure on the effectiveness of wetlands in the reduction of nutrient loadings has been included in the RBMPs</p>

Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
dRBM PCon3 7/6	Martina Magee	Fermanagh District council	Within the document, agriculture has been identified as a significant pressure affecting the water environment. However, there are a number of existing measures in place to control this pressure. We would like it noted that most of these controls apply to those farmers participating in the voluntary agri-environment schemes. Promotion of schemes should therefore be of paramount importance as there are a number of individuals along the loughshore who are not as yet participating in the scheme.	Comment is noted. NIEA plans to focus its resources on priority catchments, typically areas where for example impacts from a range of sources including agriculture where there are high levels of diffuse pollution. DARD actively promote the Agri-environment schemes at present and have a target to have 50% of agricultural land under environmental enhancement agreement by 2013.	The RBMP will include more information on the measures required to meet the objectives in each of the 26 LMAs. As part of the RBMP Implementation Programme actions plans will be developed for each LMA in liaison with stakeholder groups active in those areas.

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dRBM PCon5 5/21	Jim Haughey	Ulster Angling Federation	5.2.4 (Improvements) "20% assumed rate of improvement" - what does this mean - improvement in what? Over what period? When is it to be achieved by? 2015? 2021? 2027? It is a meaningless statement made without any justification and is applied across the board. It is an example of the obscure approach to water quality improvements adopted in the document.	The 20% refers to a reduction in phosphorus loadings due to existing agricultural measures. The report on the research undertaken will be made publicly available when it is completed.	Section on Agriculture has been updated.
dRBM PCon5 5/31	Jim Haughey	Ulster Angling Federation	It also mentions the Countryside Management Scheme which the Draft Plan states "contributes to improving morphology impacts for example by fencing off river banks to prevent cattle trampling the river". This is quite correct however there is no recognition of the fact that the scheme attracted approx. 4500 applications and only 1300 were able to enter the scheme, as funding was an issue. This was advised in the Ministers press release of October 2008. There is a clear need to ensure adequate funding is now provided to allow the other 3200 farmers to enter the scheme and ensure our waterways get the protection they deserve.	There is a target to have 50% of agricultural land area under environmental enhancement agreement by 2013.	Section on Agriculture has been updated to reflect this comment.

Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
dRBM PCon6 8/30	Patrick Case ment	CNCC	5.1.6 The research into the effectiveness of the NAP is welcomed, but should include assessment of the overall landscape capacity issue. Given climate and the total stock in NI, is it possible to dispose of the quantity of N & P produced by spreading it on the available land, given the constraints of area, timing and weather? This modelling should take into account the UKCP09 scenarios.	Comment noted. The review of the NAP Regs is being taken forward by DOE PEPG with input from DARD and others. In addition to the review of the NAP, DARD in conjunction with industry, are taking steps to reduce excess phosphorus to deliver environmental improvements and these are identified in the draft River Basin Management Plans. In particular DARD and AFBI are currently conducting a review of the effectiveness of the existing measures to reduce the phosphorus status of NI agriculture. Both DARD and DOE also recognise that land spreading of certain livestock manures such as poultry litter is not sustainable in the long-term at current levels due to its high phosphorus content, the enriched phosphorus status of soils across Northern Ireland and the resultant impact on water quality. Any review will take into account the most up to date climatic data available.	Section on Agriculture has been updated.
dRBM PCon6 8/31	Patrick Case ment	CNCC	5.2.4 It is unclear what is meant by “a 20% rate of improvement”. What is being improved? Presumably water body status, but if so, how can this be a “20% rate”?	The 20% refers to a reduction in phosphorus loadings due to existing agricultural measures. The report on the research undertaken will be made publicly available when it is completed.	Section on Agriculture has been updated.

Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
dRBM PCon6 9/6	Stuart Wightman	DRD WPD	Further clarity could be achieved in linking essential improvement measures in the agricultural sector to measurable water quality improvements. The plans must ensure that an appropriate contribution to water quality improvement objectives is required of the agricultural sector and that water quality objectives are realistic.	The objectives have been reviewed using the 2009 status classification data and are presented in the RBMP.	The RBMP will include more information on the measures required to meet the objectives in each of the 26 LMAs. As part of the RBMP Implementation Programme actions plans will be developed for each LMA in liaison with stakeholder groups active in those areas.

Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
dRBM PCon7 2/4	Aileen Lawson	UFU	It should be noted that the use of willows/reed beds for bioremediation is being used in some areas in Northern Ireland. Coppiced willow has potential to utilise applied nutrients from many sources, producing high yields of biomass. The willow can then be harvested, on a three-year rotation, chipped and dried as a fuel to provide heat. Organisations, companies and farmers are using coppiced willow in this way to further treat effluent from their businesses or NI Water sewage treatment works and therefore reduce the polluting potential as it is essentially filtered before entering the water environment. This system is also contributing to providing renewable energy.	Comment noted. These systems are regulated by NIEA. Depending on the circumstances they may need an exemption from the Waste Management Regulations.	Sections on Agriculture and Collection and treatment of sewage have been updated to reflect this comment.



Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
dRBM PCon7 2/10	Aileen Lawson	UFU	<p>The introduction of the Nitrates Action Programme and Phosphorus Regulations has already seen improvements in nitrogen and phosphorus efficiencies. The use of chemical fertiliser has reduced substantially, with a 75% reduction in chemical phosphorus since 2000. The industry has also taken action to produce animal/poultry feeds that are lower in phosphorus. The UFU supports the Rose Energy planning application which proposes to build an energy from waste facility to deal with the vast majority of chicken litter produced in Northern Ireland. This will result in the removal of significant amounts of phosphorus from agricultural land and would restore a more sustainable phosphorus balance for Northern Ireland. It is vital that this facility is approved to help farmers comply with environmental legislation, protect local jobs and ultimately help contribute towards improving water quality.</p>	Comment is noted.	Section on Agriculture has been updated.

Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
dRBM PCon7 2/11	Aileen Lawson	UFU	The UFU have concerns regarding proposals to target the uptake of agri-environment schemes in areas where there is poor water quality and currently a low uptake of the schemes. These schemes are voluntary and there are valid reasons as to why farmers have not/cannot enter into agri-environment agreements. There is no evidence that farmers who are not participating in agri-environment schemes are causing more pollution.	Comment noted. NIEA has subdivided the three River Basin Districts onto 26 Local Management Areas (LMAs), which are based on sub basin catchments. Details of these areas were included as part of the supporting documentation for the consultation on the draft plans. The LMAs are being used as the level at which measures will be set and it is planned to develop action plans to implement the RBMPs in these areas. The action plans will be implemented on a three year rolling programme to allow resources to be targeted. To reduce the risk of farm pollution, all NICMS applicants receive a compulsory farm nutrient and waste management advisory visit. As a scheme participant, a farmer must prepare and implement a farm nutrient and waste management plan. This should lessen the risk of a pollution incident.	Section on Agriculture has been updated.
dRBM PCon8 5/10	Sean Convery	FWAG NI	Strong links must be made with PPS21 regulations, The EU Biodiversity Directive, The UK Marine Bill and (if possible) an awareness of Climate Change. For agriculture, it is important to seek greater industry recognition of the problems that are still occurring and to make stronger links between the Countryside Management Scheme and water quality matters on the farm. There is also a very significant number of farmers not in agri-environment schemes. These farm businesses may have a more significant effect on water quality than	NIEA has subdivided the three River Basin Districts onto 26 Local Management Areas (LMAs), which are based on sub basin catchments. Details of these areas were included as part of the supporting documentation for the consultation on the draft plans. The LMAs are being used as the level at which measures will be set and it is planned to develop action plans to implement the RBMPs in these areas. The action plans will be implemented on a three year rolling programme to allow resources to be targeted. Effective pollution control is central to all agri-environment scheme	The RBMP will include more information on the measures required to meet the objectives in each of the 26 LMAs. As part of the RBMP Implementation Programme

Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
			those in the CMS. The Dairy industry and DARD, along with Unions and farming NGOs need to start addressing the issues of continued diffused pollution and how the industry can adapt.	agreements. In addition, there are a number of water management options within NICMS. Water quality objectives for NICMS are highlighted throughout the information booklet.	actions plans will be developed for each LMA in liaison with stakeholder groups active in those areas.
dRBM PCon1 00/11	CSG Meeting: Upper Foyle	CSG Meeting: Upper Foyle	CMS should continue to fund buffer zones and grass margins along water courses, also other environmental measures on farms after the existing schemes end. The first schemes will shortly come to the end of their 10 year agreements.	Although some existing agri-environment agreements are coming to an end, there is even greater provision for such management under NICMS. Habitat enhancement options under NICMS include 'Farm waterway and riparian zone management' and 'Riverbed enhancement.'	Section on Agriculture has been updated.

### 3.5.11 Alien species

Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
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Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
dRBM PCon1 1/9	Keady District Angling Club	Keady District Angling Club	Zebra mussel management - more info to angler at points of interest - license/permits/slip ways/tackle shops etc.	<p>In 2008 and 2009 NIEA distributed signage to local authorities, marinas and clubs for placement around many of Northern Ireland's waterbodies. This signage aims to prevent the further spread of Zebra Mussels and to raise awareness of the problems associated with aquatic weeds. NIEA has published a guidance leaflet aimed at anglers in relation to prevention of the spreading of Zebra Mussel colonies. The leaflet is available on the NIEA website and the advice to anglers, if followed, can also help prevent the spread of fish diseases. The recommended practices for anglers are:</p> <ul style="list-style-type: none"> <li>- Ensure that all equipment is fully dried out or immersed in hot water before use in a different water body.</li> <li>- Ensure keep nets or landing nets do not have zebra mussels attached.</li> <li>- Do not return bait bucket water to an uninfected lake.</li> <li>- Do not re-use bait if it has been exposed to infested waters.</li> <li>- Do not use zebra mussels as bait in uninfected waters.</li> <li>- Do not transfer water from a lake invaded with zebra mussels to an uninfected lake.</li> </ul> <p>In July 2009 a newly updated Zebra Mussel Awareness Leaflet was sent out to the Zebra Mussel stakeholder list members. An</p>	Section on Alien species has been updated.

Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
				accompanying letter was also sent to relevant members advising of the signage and offering its supply.	
dRBM PCon1 6/2	Roy Carton	Angler - Upper River Bush	I have been told that the intention was to provide cover for juvenile salmonids, and to enhance the habitat for invertebrate species. While the intention may have been good, unfortunately, in the nutrient rich water of the river Bush, this invasive weed is now growing out of control. It is clearly limiting the spawning productivity of our remaining wild Bush Salmon.	Ranunculus pencillatus is a native species. DCAL Inland Fisheries at Bushmills manage the River Bush for its fisheries and are aware of the issue. As acknowledged in the comment nutrient enrichment has resulted in its growth. Measures such as the DARD NICMS riparian zone management and Nitrates Directive aim to reduce nutrient enrichment and as such should benefit issues where native species such as Ranunculus pencillatus become problematic. NIEA plans to focus its resources on priority catchments e.g. where there are high levels of diffuse pollution impacts from a range of sources.	As part of the RBMP Implementation Programme actions plans will be developed for each LMA in liaison with stakeholder groups active in those areas.
dRBM PCon2 3/168	Clair Cockerill	Freshwater Task Force	There is no mention of the Countryside Management Scheme through which farmers can be paid to control non-native plants. NIEA should ensure that Hogweed, Knotweed and Balsam are incorporated and actively taken up within this Scheme.	NIEA Natural Heritage and Water Management Unit worked closely with DARD CMB in the development of the new DARD NICMS to ensure it included the option to control invasive species through the Minimum entry options.	Section on Alien species has been updated.

Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
dRBM PCon23/172	Clair e Cock erill	Freshw ater Task Force	<ul style="list-style-type: none"> <li>Invasive plant management should be built in as part of cross compliance, planning applications, council land management and public spaces requirements.</li> </ul>	It is built in as part of cross compliance in that farmers must comply with the Wildlife Order (NI) 1985. NIEA Natural Heritage are consulted on planning applications where they are deemed to potentially have a significant environment impact i.e. on a designated site. Where NIEA staff identify an invasive alien species in their survey they will note it to Planning Service. NIEA Natural Heritage have actively been working with the DOE Planning Service on the review of PPS2. NIEA have proposed to Planning Service to include a policy relating to invasive species and development. The review of the Wildlife Order (NI) 1985 proposed to place a biodiversity duty of care on local government bodies. For several years now many councils have actively been controlling invasive alien species in their parks.	Section on Alien species has been updated.
dRBM PCon63/3	John Kelpi e	Derry City Council	In relation to the general aim 'to create better habitats for wildlife in and around water' we recognise invasive species as a key issue that although localised is common throughout the River Basin. In relation to the Derry city council area, there are many species that are currently a cause for concern. An additional Pacific oyster record for table 5.10 Provisional Invasive Alien List for ECor 17 is Lough Foyle.	Comment is noted. Section on Alien Species has been updated to include reference to the presence of the Pacific Oyster in Lough Foyle. (See Table 5.10)	Section on Alien Species has been updated.

Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
dRBM PCon9 3/13	CSG Meeting: Strangford and Lecale	CSG Meeting: Strangford and Lecale	3.3 Movement of shellfish – not included in Alien Species	Comment noted for RBMP.	Section on Alien species has been updated.

### 3.5.12 Cost effectiveness

Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
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Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
dRBM PCon2 3/4	Clair e Cock erill	Freshw ater Task Force	Outstanding elements of work e.g. cost effectiveness analysis, regulatory impact analysis, programmes of measures for achieving favourable conservation status in Protected Areas, should be fully completed in time for inclusion in a public consultation process. The final Plans should be released in the public domain with opportunity for further comment. This approach should continue throughout the life cycle of the Plans, given that the competent authority views the process of implementing RBMPs as iterative.	The Department has engaged consultants to prepare a strategic impact assessment on costs and benefits of proposed new measures over and above basic measures that are required irrespective of WFD. The strategic impact assessment will be included in the River Basin Management Plans to be published in December 2009. Information provided in the plans will include reasons for setting alternative objectives, linking measures to the objectives and where relevant measures for protected areas under the Habitats and Birds Directives.	A strategic regulatory impact assessment on the costs and benefits of new measures will be included in the RBMPs
dRBM PCon2 3/6	Clair e Cock erill	Freshw ater Task Force	For those areas already achieving good ecological status further information is required about how this status will be protected and maintained. Currently, there is no attempt to improve the status of water bodies designated as 'good'. No financial or budgetary information is made available in the Plans and no budget has been allocated for the objectives and measures contained within. Taskforce notes, however, the statement that "While the aim is to provide cleaner and healthier waters, we cannot ignore economic realities". The Freshwater Taskforce request that exact figures relating to this shortfall are provided. While economic realities cannot be ignored, the Taskforce would stress the longer term economic implications for Northern Ireland of non-implementation, including infraction.	The Department has engaged consultants to prepare a strategic impact assessment on costs and benefits of proposed new measures over and above basic measures that are required irrespective of WFD. The strategic impact assessment will be included in the River Basin Management Plans to be published in December 2009.	A strategic regulatory impact assessment on the costs and benefits of new measures will be included in the RBMPs



Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
dRBM PCon2 3/26	Clair e Cock erill	Freshw ater Task Force	<ul style="list-style-type: none"> <li>• Economic priorities are increasing the risk of a minimalist approach being adopted to the implementation of Water Framework Directive;</li> </ul>	An inter - departmental bid has been prepared to cover the period April 2010 - March 2013, which is specifically targeted at achieving the objectives set out in the plans. The achievement of the objectives are a shared responsibility across the departments of Environment, Agriculture, Arts and Lesiure and Regional Development. As such it is expected that identifying the necessary funds to meet the objectives will inform any required future bids. Any proposals for additional expenditure will be the subject of bids through the normal Budget process and in-year monitoring rounds. As part of the implementation programme for the plans NIEA will be reviewing current funding mechanisms that are in place to assess if alternatives are required.	The RBMP will include more information on the measures required to meet the objectives in each of the 26 LMAs. As part of the RBMP Implementation Programme actions plans will be developed for each LMA in liaison with stakeholder groups active in those areas.

Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
dRBM PCon2 3/34	Claire Cockerill	Freshwater Task Force	3.4. Cost effectiveness analysis should be the determining factor in assessing priority areas and priority actions for such areas. To date, no such analysis has been made available for public consultation. The FWTF, therefore, insists that this information be made available. Methods that have been proposed are a combination of existing legislation and a selection of additional measures that provide anecdotal evidence of future success. Proposed measures should be accompanied by a timetable of when Good Ecological Status will be met and how this will deliver over and above existing legislation.	The strategic impact assessment will be included in the River Basin Management Plans to be published in December 2009. Further work has been carried out to clearly identify where "new measures" over and above current basic measures will be required to meet the objectives set out in the plans. The information provided in the plans will include reasons for setting alternative objectives, linking measures to the objectives and where relevant measures for protected areas under the Habitats and Birds Directives. Six additional "new measures" have been identified as part of the consultation responses received.	The RBMP will include more information on the measures required to meet the objectives in each of the 26 LMAs. As part of the RBMP Implementation Programme actions plans will be developed for each LMA in liaison with stakeholder groups active in those areas.

Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
dRBM PCon2 3/35	Claire Cockerill	Freshwater Task Force	3.5. Each RBMP states that the environmental policy will evolve to take account of the best course of action to sustainably manage the water environment, as well as the cost-effective and proportionate action that could address the most significant pressures. Further information is required as to the sustainability model/criteria applied to ensure that undue weighting is not given to economic considerations nor placed on decision makers regarding what is cost-effective and proportionate.	The strategic impact assessment will be included in the River Basin Management Plans to be published in December 2009. Further work has been carried out to clearly identify where "new measures" over and above current basic measures will be required to meet the objectives set out in the plans. The information provided in the plans will include reasons for setting alternative objectives, linking measures to the objectives and where relevant measures for protected areas under the Habitats and Birds Directives. Six additional "new measures" have been identified as part of the consultation responses received.	The RBMP will include more information on the measures required to meet the objectives in each of the 26 LMAs. As part of the RBMP Implementation Programme actions plans will be developed for each LMA in liaison with stakeholder groups active in those areas.

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dRBM PCon2 3/177	Claire Cockerill	Freshwater Task Force	<ul style="list-style-type: none"> <li>• P16. Revenues and cost recovery assessment is not carried out at RBD level.</li> <li>• P18. No attempt has been made to calculate the cost recovery level given the new water charging regime that is planned.</li> <li>• P18. What are the implications on WFD of delayed water charges? A water charging scheme does not plan to adopt metering widely, therefore, how will the agency create an incentive for efficient use of water?</li> <li>• Information needs to be obtained and provided to ascertain how the CRP tasks have been progressed. Information needs to be obtained and provided to ascertain how the Northern Ireland specific tasks have been progressed.</li> <li>• Cost effectiveness of measures assessment should be included in RBMPs. This significant body of work is yet to be completed. Article 5 should include a clear summary of the recommendations made by all strategic documents including the costs effectiveness analysis and impact assessment with clear costing to explain why measures have been selected. The Freshwater Taskforce believes this work must be completed as a matter of urgency in order to select and justify measures that will be included in the final Plan.</li> </ul>	<p>The Department has engaged consultants to prepare a strategic impact assessment on costs and benefits of proposed new measures over and above basic measures that are required irrespective of WFD. The strategic impact assessment will be included in the River Basin Management Plans to be published in December 2009. Information provided in the plans will include reasons for setting alternative objectives, linking measures to the objectives and where relevant measures for protected areas under the Habitats and Birds Directives. Ministers have not yet agreed proposals for the funding of household water and sewerage consumption, however, the cost of providing water and sewerage services to households has been identified. The bulk of non-essential or discriminatory water use occurs in the non-domestic sector and the rolling out of metering in this sector will make an impact on improving the efficient use of water resources. A new measure on the promotion of efficient use of water has been included in the RBMPs.</p>	<p>A strategic regulatory impact assessment on the costs and benefits of new measures will be included in the RBMPs</p>

Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
dRBM PCon2 7/1	Brian McKi nley	Randalstown Angling Club	<p>The Pricewaterhouse Coopers Report of July 2007 for DCAL on the social and economic value of angling in NI, states that all forms of angling in NI support some 780 full time equivalent jobs, and is worth some £40m p.a. to the NI economy, mostly from game angling. If this jobs/economic benefit is to maintained and enhanced, the provision of good water quality is absolutely vital for our fisheries.</p> <p>We fully support The Ulster Angling Federation response to this consultation.</p> <p>We fully support the Freshwater Task Force response to this consultation.</p> <p>These points raised in the UAF paper require special attention</p> <p>Major Issues</p> <p>1 The extended deadlines for Good Status must be improved.</p> <p>2 There is a lack of basic information; for any given waterway, there is no list of the specific pollution inputs, and no specific plan to deal with them.</p> <p>3 These issues receive insufficient attention; Riverbank development. Hydro-electric schemes. (Randalstown Hydro Scheme has had a detrimental impact on our fishery, and has inadequate control measures in place.)</p> <p>Septic Tanks.</p> <p>Climate Change.</p>	<p>The strategic impact assessment on costs and benefits of proposed new measures over and above basic measures that are required irrespective of WFD will include the benefits to tourism. The strategic impact assessment will be included in the River Basin Management Plans to be published in December 2009. However it is recognised that further work will be required to capture the benefits of tourism at a local level.</p> <p>NIEA has subdivided the three River Basin Districts onto 26 Local Management Areas (LMAs), which are based on sub basin catchments. Details of these areas were included as part of the supporting documentation for the consultation on the draft plans. The LMAs are being used as the level at which measures will be set and it is planned to develop action plans to implement the RBMPs in these areas. The action plans will be implemented on a three year rolling programme to allow resources to be targeted.</p> <p>For “non-consumptive” (i.e. hydro-schemes) abstractions the water body itself is not abstracted, as there is no net loss of natural flow. This is the case in most hydro-schemes diverting and returning volumes over a stretch of river. In such proposals the issue of the de-watering of a stretch has to be addressed as this activity may be detrimental to the ecological functionality of the</p>	<p>A strategic regulatory impact assessment on the costs and benefits of new measures will be included in the RBMPs.</p> <p>The RBMP will include more information on the measures required to meet the objectives in each of the 26 LMAs. As part of the RBMP Implementation Programme actions plans will be developed for each LMA in liaison with stakeholder groups active in those areas.</p>

Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
			<p>Review of existing Consents in the context of lower summer flows as a result of climate change.</p> <p>4 The reliance on UKTAG is a crucial weakness and needs to be changed.</p> <p>5 The success of the RBMPs depends on adequate enforcement; the proposed "Revised Enforcement &amp; Prosecution Policy 2009" is clearly a substantial retreat by NIEA from any reasonable enforcement regime, will give encouragement to polluters, and requires a radical re-think.</p>	<p>entire waterbody to the extent that the overall ecological status of the waterbody is degraded.</p> <p>The NIEA considers that it is preferable to apply the guidance from UK Tag where possible in order to have a robust approach to the interpretation of the technical details of implementing the Directive and to take advantage of the research resource available through UKTag membership, rather than a "go it alone" approach that would be difficult to defend. The application of the standards, compliance assessment and reasons for alternative deadlines are there to ensure a consistent and reasonable approach to achieving the requirements of the Directive. Otherwise you risk an ad hoc approach to implementing the Directive and bringing it into disrepute by committing to standards and objectives that cannot reasonably be achieved or defended. NIEA considers that such an independent approach would not increase the resilience of protecting the water environment but is likely to result in confusion and frustration for all who are involved in delivering the improvements in the water environment that are desirable.</p> <p>Effective, robust enforcement is an essential part of NIEA's weaponry to protect the environment and increase compliance with environmental legislation. The creation of the Agency-wide Environmental Crime Unit and the revised enforcement policy</p>	<p>A document on heavily modified waterbodies to be provided as a supporting document to the RBMP is being produced.</p> <p>Section on Collection and Treatment of Sewage has been updated.</p> <p>Section on Climate Change has been updated.</p>

Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
				<p>clearly demonstrate the Agency's commitment to firm and consistent enforcement.</p> <p>The revised enforcement policy clearly states that there will be firm action taken in the case of serious offences, with pollution considered to be in this category, and indeed that the Agency continues to work to strengthen its enforcement powers.</p> <p>It should be noted that the enforcement policy encompasses NIEA's approach to the full spectrum of environmental offences, from technical breaches to serious environmental damage cases. In our role to protect the environment, we must also focus on pro-active, preventative activity to advise and support industry to implement sustainable practices and comply with legislation.</p> <p>NIEA actively seeks to engage with all stakeholders interested in the water environment through nine Catchment Stakeholder Groups (CSG) which meet biannually. The CSGs consist of representatives from Government Departments/ Agencies, angling groups, NGOs, landowners, and members of the public, that work together to address local water management issues. The CSG meetings enable stakeholders to engage with the statutory authorities in order to influence decisions on how the Water Framework Directive is implemented in Northern Ireland. The group share local knowledge and expertise so as to address and resolve local water management issues.</p>	

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dRBM PCon29/1	Bill McCann	London derry Port and Harbour commissioners	We are encouraged that the economic value of our water environment and the commercial sectors with close link with the water environment has been identified as of strategic importance to the region.	Comment noted. The Department has engaged consultants to prepare a strategic impact assessment on costs and benefits of proposed new measures over and above basic measures that are required irrespective of WFD. The strategic impact assessment will be included in the River Basin Management Plans to be published in December 2009.	The strategic impact assessment will be included in the River Basin Management Plans to be published in December 2009.



Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
dRBM PCon3 9/1	Jenni fer Robi nson	The Consu mer Council	<p>The Consumer Council's approach to this consultation is to concentrate on the areas of cost and public participation as there are better equipped organisations with greater knowledge and experience to respond to the environmental elements of the documents. However, we would strongly advocate that any decisions made to implement schemes are evidence based through robust analysis to ensure that they deliver tangible benefits.</p> <p>The Consumer Council is aware that the Northern Ireland Executive (Executive) is currently considering the future of domestic water charges and we await the Executive's consultation on this issue. One of the key constraints in the delivery of the River Basin Management Plans (RBMP) will be the costs involved in implementing the measures outlined within the plans. The Consumer Council has consistently recognised the need for increased investment and improvement in Northern Ireland's water and sewerage services. However, given the potential impact that these RBMPs will have on the water and sewerage industry and consumers as a whole our main concern is the costs associated with the implementation of the programme of measures. While the Consumer Council understands that</p>	<p>The Department has engaged consultants to prepare a strategic impact assessment on costs and benefits of proposed new measures over and above basic measures that are required irrespective of WFD. The strategic impact assessment will be included in the River Basin Management Plans to be published in December 2009. Information provided in the plans will include reasons for setting alternative objectives, linking measures to the objectives and where relevant measures for protected areas under the Habitats and Birds Directives. Ministers have not yet agreed proposals for the funding of household water and sewerage consumption, however, the cost of providing water and sewerage services to households has been identified. The bulk of non-essential or discriminatory water use occurs in the non-domestic sector and the rolling out of metering in this sector will make an impact on improving the efficient use of water resources. A new measure on the promotion of efficient use of water has been included in the RBMPs.</p>	<p>A strategic regulatory impact assessment on the costs and benefits of new measures will be included in the RBMPs</p>

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			<p>the costs and benefits of existing measures which are identified in the plans would have been assessed prior to their introduction we are disappointed that a draft impact assessment for the additional measures has not been published alongside the plans. We seek clarification if the overall cost of implementing the programme of measures will be made available for consultation prior to the final plans being published. The Consumer Council has previously advocated in our response to the Minister for Regional Development's consultation on draft Environmental and Social Guidance that the issue of affordability should not be lost while pursuing environmental improvements. The essence of sustainability is to adopt a tri-partite approach which protects the environment, society and economic development. The challenge is getting the balance right between these three elements. Therefore it is important that all the proposals are subject to a cost benefit analysis to ensure that the costs do not outweigh the benefits that are due to be achieved. Further information on this analysis should be provided within the plans. In the spirit of openness and transparency the delivery of the RBMPs needs to be effectively monitored and publicly reported on to</p>		

Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
			<p>help demonstrate value for money. Outcomes and results must be communicated to consumers in a timely manner. Transparency and Consumer Council reference PD 20090235 June 2009 3 accountability in this manner will benefit water users and the general public.</p>		

Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
dRBM PCon3 9/2	Jenni Roberson	The Consumer Council	<p>The Consumer Council welcomes that consideration has been taken to extend deadlines were it proves that carrying out the improvements by 2015 may be disproportionately expensive. As there is the prospect of additional environment requirements in the future through tightening the scope of EU Directives the Consumer Council would also urge consideration of what future options are available for the managing of costs through mechanisms such as extended timescales, seeking temporary derogations and/or consideration of reasonable but not excessive costs, especially given the particular circumstances of the water sector in Northern Ireland and the backlog of investment.</p>	<p>Further work has been carried out to clearly identify where "new measures" over and above current basic measures will be required to meet the objectives set out in the plans. The information provided in the plans will include reasons for setting alternative objectives, linking measures to the objectives and where relevant measures for protected areas under the Habitats and Birds Directives.</p> <p>NIEA has subdivided the three River Basin Districts onto 26 Local Management Areas (LMAs) , which are based on sub basin catchments. Details of these areas were included as part of the supporting documentation for the consultation on the draft plans. The LMAs are being used as the level at which measures will be set and it is planned to develop action plans to implement the RBMPs in these areas. The action plans will be implemented on a three year rolling programme to allow resources to be targeted</p> <p>The RBMP will include more information on the measures required to meet the objectives in each of the 26 LMAs. As part of the RBMP Implementation Programme actions plans will be developed for each LMA in liaison with stakeholder groups active in those areas.</p>	<p>Supplementary measures are clearly set out in the RBMPs.</p>

Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
dRBM PCon5 0/6	Adrian Abbott	British Hydropower Association	BHA believe that important existing measures have been identified. We believe that in implementing proposals actions should be subject to tests for their cost effectiveness, technical feasibility and benefits.	The Department has engaged consultants to prepare a strategic impact assessment on costs and benefits of proposed new measures over and above basic measures that are required irrespective of WFD.	The strategic impact assessment will be included in the River Basin Management Plans to be published in December 2009.
dRBM PCon5 0/8	Adrian Abbott	British Hydropower Association	The BHA believes that an important guiding principle should be that the overall costs do not exceed the overall benefits.	The Department has engaged consultants to prepare a strategic impact assessment on costs and benefits of proposed new measures over and above basic measures that are required irrespective of WFD.	The strategic impact assessment will be included in the River Basin Management Plans to be published in December 2009.
dRBM PCon5 5/10	Jim Haughey	Ulster Angling Federation	The Pricewaterhouse Coopers Report of July 2007 for DCAL on the social and economic value of angling in NI, states that all forms of angling in NI support some 780 full time equivalent jobs, and is worth some £40m p.a. to the NI economy, mostly from game angling. This needs to be included in the RBMPs.	The strategic impact assessment on costs and benefits of proposed new measures over and above basic measures that are required irrespective of WFD will include benefits to tourism. The strategic impact assessment will be included in the River Basin Management Plans to be published in December 2009.	A strategic regulatory impact assessment on the costs and benefits of new measures will be included in the RBMPs.

Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
dRBM PCon5 8/18	Angela Halpeny	NIWater	<p>The main costs for NI Water will be associated with</p> <ul style="list-style-type: none"> <li>Ø Upgrade of WWTW and sewerage systems to meet the more stringent water quality objectives potentially required for the WFD.</li> <li>Ø Provision of energy intensive treatment processes will increase the carbon footprint.</li> <li>Ø Potential chemical costs associated with nutrient removal, in particular for P reduction.</li> <li>Ø Development and implementation of Drinking Water Safety Plans</li> </ul> <p>The main benefits arising</p> <ul style="list-style-type: none"> <li>Ø Increase in WWTW effluent compliance and reduction in the number of pollution incidents</li> <li>Ø Safeguarding the public drinking water supply</li> </ul> <p>The main barrier to implementation of RBMP's will be the level of funding provided by DRD in the next investment cycle PC10-13. The challenge will be delivery of the CWP on time to meet the requirements of the plans.</p> <p>NI Water would like to be made aware of the outcome of the NIEA assessment of this feedback and any changes made in the Plan as a result.</p>	<p>The Department has engaged consultants to prepare a strategic impact assessment on costs and benefits of proposed new measures over and above basic measures that are required irrespective of WFD.. The strategic impact assessment will be included in the River Basin Management Plans to be published in December 2009.</p>	<p>The strategic impact assessment will be included in the River Basin Management Plans to be published in December 2009.</p>

Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
dRBM PCon6 5/3	Claire Cockrill	WWF NI	The use of disproportionate cost or lack of cost effectiveness as a reason for setting alternative, lower objectives is not adequately justified. Given that the required cost effectiveness analysis has not been completed to date, WWF-NI does not understand how cost can be cited as grounds for not achieving Directive requirements. The plans should clearly state how much it would cost to achieve GES in all water bodies where the reason for failure is understood. This would make both the challenges ahead and the use of disproportionate cost clear and transparent.	Further work has been carried out to clearly identify where "new measures" over and above current basic measures will be required to meet the objectives set out in the plans. The information provided in the plans will include reasons for setting alternative objectives, linking measures to the objectives and where relevant measures for protected areas under the Habitats and Birds Directives. The strategic impact assessment will be included in the River Basin Management Plans to be published in December 2009.	The strategic impact assessment will be included in the River Basin Management Plans to be published in December 2009.
dRBM PCon6 5/8	Claire Cockrill	WWF NI	WWF-NI envisages that the main costs of implementing the plans will be outweighed by the environmental, economic and social benefits and call for a full economic analysis of water management as required by the WFD. Currently, there is much outstanding work with regard to completing the economic analyses required by the WFD at River Basin District level. The Article 5 report on economic analysis produced in 2005 promised that 'assessment at the RBD scale will be made possible by 2008 in line with the requirements', yet there is no evidence that assessment at this level has been conducted. Outstanding elements include: assessment of all water bodies; a full Cost Effectiveness Analysis which would identify and prioritise those measures that can achieve objectives most cost	Comment is noted.	The strategic impact assessment will be included in the River Basin Management Plans to be published in December 2009.

Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
			efficiently; calculation of cost recovery at RBD level; calculation of environmental and resource costs arising where water services abstractions and discharges result in failure to achieve good ecological status. Furthermore, information needs to be provided on how the outstanding tasks identified in the 2005 Article 5 report have been addressed. Coupled with the short term funding arrangements within government and insufficient dedicated resources generally, progress to achieving good quality status is restricted.		
dRBM PCon6 6/1	Andrew McDowell	National Trust	Key gaps in information and analysis mar the plans. In particular, the fact that important supporting work like the Economic Analysis Summary Report was not completed, and findings not incorporated into the draft plans fatally flaw the reasoning around levels of improvement and proposed measures. Key opportunities to be proactive in protecting and improving biodiversity have been missed.	The Department has engaged consultants to prepare a strategic impact assessment on costs and benefits of proposed new measures over and above basic measures that are required irrespective of WFD. The strategic impact assessment will be included in the River Basin Management Plans to be published in December 2009. The Art Economic Analysis Summary Report will be updated for the RBMP.	The strategic impact assessment will be included in the River Basin Management Plans to be published in December 2009. The updated Art Summary will be made available.



Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
dRBM PCon6 6/6	Andrew McDowell	National Trust	<p>The draft plans justify setting a lower level of ambition for improvement on economic grounds (to avoid “disproportionate expense” and “not ignoring economic realities”). Yet the impact assessment identifying costs and benefits of implementing additional measures will only be ready for the final plans, and the Economic Analysis Summary Report has not been updated or incorporated . It is hard to comment constructively on draft plans which discount a particular level of improvement as too costly, yet contain no analysis of what the costs might actually be.</p> <p>We would rather have seen an approach which used detailed data and expertise on water bodies to give a range of cost-benefit scenarios. This would have allowed stakeholders and NIEA staff to have a genuine debate around pressures and hard choices on the costs of new measures . Instead we have a plan which has a level of improvement set in abstraction and then ‘checked’ or ‘refined’ against reality.</p>	<p>The Department has engaged consultants to prepare a strategic impact assessment on costs and benefits of proposed new measures over and above basic measures that are required irrespective of WFD.. The strategic impact assessment will be included in the River Basin Management Plans to be published in December 2009.</p> <p>The Art Economic Analysis Summary Report will be updated for the RBMP</p> <p>Further work on cost effectiveness will be carried out as part of the implementation of measures.</p>	<p>The strategic impact assessment will be included in the River Basin Management Plans to be published in December 2009.</p> <p>The updated Art Summary will be made available.</p>

Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
dRBM PCon6 7/1	Joanne Gaffney	Aquaculture Initiative	Article 5 Economic Analysis Summary Report We look forward to the updated Article 5 Economic Analysis Summary Report as we feel that this is key to the identification of suitable measures to achieve an environmentally, socially and economically sustainable aquatic environment without placing undue pressure on any one sector. We trust that the updated Economic Analysis Report will be subject to much greater consultation at drafting than that which was undertaken in 2005	Comment is noted. There is no provision in the Water Framework Directive to consult on the Article 5 Economic Analysis report. However the Department of Environment would welcome any comments on the updated report.	The updated Article 5 report will be made available as part of the RBMP supporting documentation.
dRBM PCon6 8/13	Patrick Casement	CNCC	All 3 Plans state; "Recognising the need to ensure that Northern Ireland makes further progress towards meeting our WFD obligations over this and subsequent cycles, environmental policy will have to evolve to take into account: <ul style="list-style-type: none"> <li>• increasing evidence as to the best course of action to sustainably manage the water environment and address the most significant pressures</li> <li>• cost-effective and proportionate action that could address the most significant pressures."</li> </ul> Further information is required as to the criteria	NIEA has subdivided the three River Basin Districts onto 26 Local Management Areas (LMAs) , which are based on sub basin catchments. Details of these areas were included as part of the supporting documentation for the consultation on the draft plans. The LMAs are being used as the level at which measures will be set and it is planned to develop action plans to implement the RBMPs in these areas. The action plans will be implemented on a three year rolling programme to allow resources to be targeted	The RBMP will include more information on the measures required to meet the objectives in each of the 26 LMAs. As part of the RBMP Implementation Programme

Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
			and model that will be used to inform these judgements, who will make these decisions and how stakeholders will be involved.		actions plans will be developed for each LMA in liaison with stakeholder groups active in those areas.
dRBM PCon6 8/22	Patrick Case ment	CNCC	In assessing the impacts of the Plan, information was needed at the draft stage, otherwise how else can comment be made on effectiveness be judged? It is unclear what is meant by "impact assessment, identifying the cost and benefits, etc" Does this mean a Regulatory Impact Assessment will be conducted? In conducting appropriate assessment of N2K sites, it is unclear how the requirement to change the Plans will be prioritised if there is shown to be an impact.	The Department has engaged consultants to prepare a strategic impact assessment on costs and benefits of proposed new measures over and above basic measures that are required irrespective of WFD. The strategic impact assessment will be included in the River Basin Management Plans to be published in December 2009.	The strategic impact assessment will be included in the River Basin Management Plans to be published in December 2009.

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dRBM PCon7 3/3	Seamus O'Connell	IBEC	<p>§ The economic cost of measures is a significant concern for business and it is regrettable at this stage that transparent cost options are not available. IBEC wishes to comment on specific figures and options for the achievement of objectives.</p> <p>§ The final step in the Cost Effectiveness Analysis process is to determine that the most cost-effective strategy is not disproportionately expensive. IBEC considers it vital that thorough and transparent cost effectiveness studies are completed with real options to choose between to ensure value for money when the final measures are agreed upon.</p> <p>§ IBEC supports the implementation of the most cost effective measures. If it is decided that the measure is disproportionately expensive achievement of good status can be postponed until 2021 and ultimately 2027. IBEC recommends that in such cases, use should be made of the derogations until 2021 or 2027 where feasible.</p>	<p>The Department has engaged consultants to prepare a strategic impact assessment on costs and benefits of proposed new measures over and above basic measures that are required irrespective of WFD. The strategic impact assessment will be included in the River Basin Management Plans to be published in December 2009. Information provided in the plans will include reasons for setting alternative objectives, linking measures to the objectives and where relevant measures for protected areas under the Habitats and Birds Directives.</p>	<p>The strategic impact assessment will be included in the River Basin Management Plans to be published in December 2009.</p>
dRBM PCon8 3/7	Mark Henderson	Coleraine Anglers Association	<p>Further information is needed about individual water bodies – including causes of failure, which measures have been considered for the water body, and why they have been considered to be either technically infeasible or disproportionately costly. Without this detail it we cannot comment on the essence of the projected plans.</p>	<p>NIEA has subdivided the three River Basin Districts onto 26 Local Management Areas (LMAs), which are based on sub basin catchments. Details of these areas were included as part of the supporting documentation for the consultation on the draft plans. The LMAs are being used as the level at which measures will be set and it is planned to develop action plans to implement the RBMPs in</p>	<p>The RBMP will include more information on the measures required to meet the objectives in each of the 26</p>

Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
				<p>these areas. The action plans will be implemented on a three year rolling programme to allow resources to be targeted. Costs and benefits will be considered when deciding how best to implement the required measures at the catchment scale. Additional information on the reasons for setting alternative objectives through the use of extended deadlines will be provided in the 1st cycle plan to be published in December 2009</p>	<p>LMAs. As part of the RBMP Implementation Programme actions plans will be developed for each LMA in liaison with stakeholder groups active in those areas.</p>
dRBM PCon8 8/1	Captain B.K. McJury	Warren point Harbour Authority	<p>The Marine Morphology section of the plan (5.9) appears to be entirely acceptable with some excellent control measures already in place which should continue to deliver both protection and improvement of the HMWB of Warren Point Harbour. The only concern Warrenpoint would have is any future initiative or regulation takes into account the full cost to the Harbour Authority in meeting whatever requirements may be imposed, particularly with regard to maintenance dredging, which as I am sure you are aware, will continue in perpetuity whilst the Harbour is in existence.</p>	<p>Comment is noted. Guidance will be developed for maintenance dredging for commercial ports in conjunction with the Ports and Harbour Authority.</p>	<p>Supplementary measure on developing dredging guidance included in RBMP.</p>

Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
dRBM PCon90/1	Clerk to the Environment Committee & Committee for Regional Development	Committee for Regional Development and Environment Committee	<p>Consultation Questions: 1 Three organisations with environmental interests participated in the event of which two did not agree with the objectives and level of importance set for Northern Ireland's water environment. For these organisations, the draft River Basin Management Plans were not sufficiently consistent, complete or ambitious enough. One organisation stated that the Plans' objectives were not consistent with the Water Framework Directive, they were not adequately justified, and the ambitions set should be higher. Another organisation was of the view that evidence shows other parts of Europe are aiming high and Northern Ireland should match this. The Plans should set out clearly how the WFD will be achieved at individual water body and river basin level.</p>	<p>The level of ambition set out in the plan is higher than in the rest of the UK and we have sought to establish objectives that are challenging but are realistic in terms achievement. The initial set objectives, using the rules established in the plan, have been reviewed by expert working groups to consider if higher objectives could be achieved within the life of the plan or whether the objectives are unrealistic given the current knowledge and understanding of the pressures on individual waterbodies and the effectiveness of the available measures. NIEA has subdivided the three River Basin Districts onto 26 Local Management Areas (LMAs), which are based on sub basin catchments. Details of these areas were included as part of the supporting documentation for the consultation on the draft plans.</p>	<p>The objectives have been reviewed using the 2009 status classification data and will be presented in the RBMP. Additional information on the reasons for setting alternative objectives through the use of extended deadlines is now included in the RBMPs. As part of the RBMP Implementation Programme actions plans will be developed for each LMA in liaison with stakeholder groups active in</p>

Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
					those areas.
dRBM PCon9 0/2	Clerk to the Environment Committee & Committee for Regional Development	Committee for Regional Development and Environment Committee	In addition, one of these groups highlighted the lack of any analysis of costs as a major flaw, and was of the view that once costings had been completed, another public consultation would be required.	The Department has engaged consultants to prepare a strategic impact assessment on costs and benefits of proposed new measures over and above basic measures that are required irrespective of WFD. The strategic impact assessment will be included in the River Basin Management Plans to be published in December 2009.	A strategic regulatory impact assessment on the costs and benefits of new measures will be published along with the RBMPs

Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
dRBM PCon90/5	Clerk to the Environment Committee & Committee for Regional Development	Committee for Regional Development and Environment Committee	The fourth organisation in this category was supportive in principle, but could not be wholly supportive until an analysis was made of the costs and benefits of the proposals.	The Department has engaged consultants to prepare a strategic impact assessment on costs and benefits of proposed new measures over and above basic measures that are required irrespective of WFD. The strategic impact assessment will be included in the River Basin Management Plans to be published in December 2009.	A strategic regulatory impact assessment on the costs and benefits of new measures will be published along with the RBMPs



Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
dRBM PCon9 0/6	Clerk to the Environment Committee & Committee for Regional Development	Committee for Regional Development and Environment Committee	Two organisations with an interest in the water industry provided feedback on this issue. Both were broadly in agreement with the objectives and level of importance set for Northern Ireland's water environment. However, both stressed the importance of adopting a joined-up, realistic approach and striking a balance between quality and cost	Comment is noted. The objective setting process has sought to adopt a realistic approach taking account of technical feasibility and current measures. In addition a Water Framework Directive Interdepartmental Board and Working Group are both in place to take forward implementation of the Directive on a coordinated basis across Departments and Agencies. Both groups meet on a regular basis.	The objectives have been reviewed using the 2009 status classification data and will be presented in the RBMP. Additional information on the reasons for setting alternative objectives through the use of extended deadlines is now included in the RBMPs

Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
dRBM PCon9 0/7	Clerk to the Environment Committee & Committee for Regional Development	Committee for Regional Development and Environment Committee	One organisation welcomed the opportunities that the RBMPs offer to continue to develop a holistic approach to the quality of the water environment, while taking into account the overall cost for the benefits derived. Another organisation stated that, while the aim is to provide cleaner and healthier waters, the economic realities cannot be ignored and although the level of ambition has been carefully set, it is not realistic to expect that all water bodies will achieve good ecological status by 2015.	The comment is noted. The objective setting process has sought to adopt a realistic approach taking account of technical feasibility and current measures.	The objectives have been reviewed using the 2009 status classification data and will be presented in the RBMP. Additional information on the reasons for setting alternative objectives through the use of extended deadlines is now included in the RBMPs
dRBM PCon9 0/9	Clerk to the Environment Committee & Committee for	Committee for Regional Development and Environment Committee	One farming organisation participated in the engagement event. This group indicated that it was happy with the objectives and level of importance set for Northern Ireland's water environment, as long as these were in line with what was in place in other EU countries. It was of the view that opt out clauses existed which could be employed to reduce costs to the farming sector, as the impact of other regulations and assessment needs could potentially present problems for the sector.	Comment is noted. Alternative objectives have set through the use of extended deadlines where appropriate. A more detailed link will be identified between the RBPs and other plans and programmes included in the RBMPs. In addition the reader is directed to the 'Register of Plans and Programmes', a supporting web based document, for further information.	The objectives have been reviewed using the 2009 status classification data and will be presented in the RBMP. Additional information on the reasons for

Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
	Regional Development				setting alternative objectives through the use of extended deadlines is now included in the RBMPs
dRBM PCon90/23	Clerk to the Environment Committee & Committee for Regional Development	Committee for Regional Development and Environment Committee	A further suggestion was that cost benefit analysis should be used to prioritise areas and actions. Different geographical and geophysical areas will result in varied impacts from the same water environment pressures, and these variations could be addressed at catchment level, thus enabling a focusing of resources. It was also suggested that the proposed measures should be accompanied by a timetable of when good ecological status will be met and, how this will deliver over and above existing legislation.	NIEA has subdivided the three River Basin Districts onto 26 Local Management Areas (LMAs), which are based on sub basin catchments. Details of these areas were included as part of the supporting documentation for the consultation on the draft plans. The LMAs are being used as the level at which measures will be set and it is planned to develop action plans to implement the RBMPs in these areas. The action plans will be implemented on a three year rolling programme to allow resources to be targeted. Costs and benefits will be considered when deciding how best to implement the required measures at the catchment scale. The timetable for achieving good status is set down in the Directive and is to be achieved over the three plan cycles i.e. by 2015, 2021 or 2027.	As part of the RBMP Implementation Programme actions plans will be developed for each LMA in liaison with stakeholder groups active in those areas.

Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
dRBM PCon90/40	Clerk to the Environment Committee & Committee for Regional Development	Committee for Regional Development and Environment Committee	Two of the organisations with environmental interests stressed that the costs of delivering the RBMPs will be outweighed by environmental, economic and social benefits. One calls for a full economic analysis of water management as required by the WFD while the other points out that there is cost of not reaching good ecological status both from fines and environmental damage. It suggests that failing to assess the financial costs of our water bodies now will incur financial pressures relating to water management in the future and lack of investment now will inevitably lead to decreased water quality.	The Department has engaged consultants to prepare a strategic impact assessment on costs and benefits of proposed new measures over and above basic measures that are required irrespective of WFD. The strategic impact assessment will be included in the River Basin Management Plans to be published in December 2009.	A strategic regulatory impact assessment on the costs and benefits of new measures will be included in the RBMPs

Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
dRBM PCon9 0/44	Clerk to the Environment Committee & Committee for Regional Development	Committee for Regional Development and Environment Committee	The organisation with leisure and tourism interests could see advantages and disadvantages when it came to costs. There would be benefits for users when they saw the water quality improved but the lack of cost assessment of the proposed programmes to date was concerning.	The strategic impact assessment on costs and benefits of proposed new measures over and above basic measures that are required irrespective of WFD will include the benefits to tourism. The strategic impact assessment will be included in the River Basin Management Plans to be published in December 2009. However it is recognised that further work will be required to capture the benefits of tourism at a local level.	A strategic regulatory impact assessment on the costs and benefits of new measures will be included in the RBMPs
dRBM PCon9 0/51	Clerk to the Environment Committee & Committee for Regional	Committee for Regional Development and Environment Committee	The two organisations with an interest in the water industry were concerned about the objectives being unrealistic; set without full consideration of cost and revenue implications leading to a failure in achieving targets which may subsequently result in a loss of momentum for the plans. The main barrier in implementing is securing funding and the objectives in the plans will need to be programmed to be achieved at an affordable rate over the current cycle up to 2015.	The Department has engaged consultants to prepare a strategic impact assessment on costs and benefits of proposed new measures over and above basic measures that are required irrespective of WFD. The strategic impact assessment will be included in the River Basin Management Plans to be published in December 2009. Funding for additional expenditure will be the subject of bids through the normal Budget process and in-year monitoring rounds. As part of the implementation of the River Basin Plans an interdepartmental "River Restoration and Improvement Programme" bid is being prepared. A	A strategic regulatory impact assessment on the costs and benefits of new measures will be included in the RBMPs

Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
	Development			key element of the programme will be to take forward specific projects aimed at improving and restoring impacted river habitats. Further consideration will be given as to how best to work within the existing regulatory framework to develop mechanisms to establish and support such a fund as proposed. The strategic impact assessment will be included in the River Basin Management Plans to be published in December 2009.	
dRBM PCon9 3/26	CSG Meeting: Strangford and Lecale	CSG Meeting: Strangford and Lecale	Costs of implementation	The Department has engaged consultants to prepare a strategic impact assessment on costs and benefits of proposed new measures over and above basic measures that are required irrespective of WFD. The strategic impact assessment will be included in the River Basin Management Plans to be published in December 2009.	The strategic RIA will be published along with the RBMPs.
dRBM PCon9 5/15	CSG Meeting: Bush and Glens	CSG Meeting: Bush and Glens	Will the plan be costed?	The Department has engaged consultants to prepare a strategic impact assessment on costs and benefits of proposed new measures over and above basic measures that are required irrespective of WFD.. The strategic impact assessment will be included in the River Basin Management Plans to be published in December 2009.	The strategic RIA will be published along with the RBMPs.

Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
dRBM PCon99/1	CSG Meeting: Lower Foyle	CSG Meeting: Lower Foyle	<p>Not obvious how social need and benefit are assessed.</p> <ul style="list-style-type: none"> <li>- How do you determine what is “affordable”?</li> <li>- How to value environment in terms of use and cost of improvement?</li> <li>- Query technical/cost reasons in relation to alternative objectives.</li> <li>- More information required on classification and how objectives are set.</li> <li>- General agreement can’t answer question.</li> </ul>	<p>The Department has engaged consultants to prepare a strategic impact assessment on costs and benefits of proposed new measures over and above basic measures that are required irrespective of WFD.. The strategic impact assessment will be included in the River Basin Management Plans to be published in December 2009.</p>	<p>The strategic RIA will be published along with the RBMPs.</p>

## 4 Linkages between River Basin Management Plans and other Plans and Programmes

Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
dRBM PCon2 3/50	Clair e Cock erill	Freshw ater Task Force	What suggestions do you have to improve that linkages this plan has with other relevant plans and programmes?. While the Freshwater Taskforce recognises the potential for the RBMPs to link with other relevant plans and programmes, the existing Plans do not maximise this opportunity. The Daughter Directives, including the Groundwater and Floods Directives, appear to have tentative links with the draft RBMPs. These Directives will be an important delivery mechanism for WFD objectives, especially in the future as floods are predicted to increase in line with global climate change.	In transposing the Floods Directive, Rivers Agency (through its parent Department DARD NI), does not have the power/remit to add to or take from the requirements of the Floods Directive which is European legislation. In addition a more detailed link will be identified between the RBPs and other plans and programmes included in the RBMPs. Section detailing Register of Plans and Programmes has been revised for the RBMP. The reader is directed to the 'Register of Plans and Programmes', a supporting web based document, for further information.	Integration of Plans and Programmes' has been updated.



Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
dRBM PCon2 3/51	Clair e Cockerill	Freshwater Task Force	The Floods Directive, which is a Daughter Directive to WFD appears to be being transposed without adequate integration with the RBMPs in spite of the opportunities for synergistic benefits. For example, the catchment management approach to river basin management is very appropriate framework for flood management in order to retain water and slow the flow in the upper catchment, reducing the volume of water to urbanised areas downstream.	Rivers Agency has made presentations on the Floods Directive to many of the Catchment Stakeholder Groups formed under WFD and has highlighted the synergy between the 2 directives and there is ongoing liaison between NIEA and Rivers Agency. Account has been taken of the River Basin Districts though the Floods Directive focuses on areas of potential significant risk but never the less catchments will be taken into consideration.	Integration of Plans and Programmes' has been updated.
dRBM PCon2 3/52	Clair e Cockerill	Freshwater Task Force	Sustainable Development (SD) is also an important policy area which could help deliver 'GES'. The new SD Implementation Plan should be linked with WFD commitments helping to strengthen the policy framework for delivery of GES within Northern Ireland.	Accepted. NIEA will be providing input on the new implementation plan and will highlight linkages with Water Framework Directive. OFMDFM has been working with Departments on the production of a second Implementation Plan (IP2) to run alongside and complement the Programme for Government (PfG) for the period 2008-11	Integration of Plans and Programmes' has been updated.
dRBM PCon2 3/58	Clair e Cockerill	Freshwater Task Force	It is not clear how RBMPs have been integrated with flood risk strategies, water company plans, DOE/NIEA strategies, fisheries action plans, and hydro-generation and development plans - all should be Climate Change and WFD proofed. There is also a clear need to link WFD/RBMP with Marine Bill requirements. The inclusion of a section that outlines which plans have overlap with RBMPs and clearly states how the objective of WFD will be integrated with other planning processes would be a helpful addition.	More details will be provided on the links between the RBMPs and other plans and programmes included in the RBMPs. The reader is directed to the 'Register of Plans and Programmes', a supporting web based document, for further information.	Integration of Plans and Programmes' has been updated.

Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
dRBM PCon2 3/59	Clair e Cockerill	Freshwater Task Force	<p>Summary:</p> <ul style="list-style-type: none"> <li>• Cross agency committees and increased cross departmental support should be used to facilitate integration with other programmes</li> <li>• Greater integration is required with Floods Directive; Groundwater Directive; Sustainable Development Strategy; Marine Strategy; Biodiversity Action Plans; Climate Change Adaption/Mitigation strategies</li> <li>• Increased integration with ROI Plans is required</li> </ul>	Points noted. This summary has been covered in detailed comments.	RBMP updated as listed in the detailed comments
dRBM PCon2 4/9	Brendan Kerr	Natural living Assets	<p>Local Initiatives</p> <p>Any decisions to move forward on plans need to take account of local initiatives being pursued by local groups including angling clubs, which strive to add value. Cooperating with local groups led by sustainable policies will lead to a better environment for all and engender a sense of responsible stewardship.</p>	Agreed. NIEA has subdivided the three River Basin Districts onto 26 Local Management Areas (LMAs), which are based on sub basin catchments. Details of these areas were included as part of the supporting documentation for the consultation on the draft plans. The LMAs are being used as the level at which measures will be set and it is planned to develop action plans to implement the RBMPs in these areas. The action plans will be implemented on a three year rolling programme to allow resources to be targeted	The RBMP will include more information on the measures required to meet the objectives in each of the 26 LMAs. As part of the RBMP Implementation Programme actions plans will be developed for each LMA in liaison with stakeholder groups active in

Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
					those areas
dRBM PCon2 7/6	Brian McKinnley	Randalstown Angling Club	The final RBMPs need also to illustrate how WFD will be integrated with Flood Risk Strategies, Water Company Water Resources Plans, Fisheries Action Plans, development plans, etc., to ensure holistic management and integrated resources. We believe that it is only by coordinating all these initiatives into individual catchment based plans that full benefit can be gained and, vitally, most efficient use be made of limited resources.	A more detailed link will be identified between the RBPs and other plans and programmes included in the RBMPs. The reader is directed to the 'Register of Plans and Programmes', a supporting web based document, for further information.	Register of Plans and Programmes has been revised for the RBMP.

Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
dRBM PCon3 0/5	David Knott	Belfast Harbour Commissioners	Account should be taken of changes arising from the Review of Public Administration. Other relevant plans and programmes should be referenced and signposted these will include: Local biodiversity action plans: Major community projects such as the Connswater Community Greenway: Voluntary Initiatives: Planning Policy Statements: Area plans such as the Belfast Metropolitan Area Plan: Port Master Plans.	A more detailed link will be identified in the RBMP demonstrating how the River Basin Planning process is committed to working together with other organisations. The reader is directed to the 'Record of Consultation and Engagement', a supporting web based document, for further information.	Section on 'Working Together' has been updated.
dRBM PCon3 7/8	Martina Magee	Fermanagh District Council	The Council has recently published the Fermanagh Local Biodiversity Action Plan. Open water habitats have been listed as a locally important priority habitat and an individual species action plan has been constructed focusing on invasive alien species. There is also the possibility of enhancing existing initiatives or indeed developing new initiatives that will facilitate the attainment of the objectives set under the WFD as part of this process. The Council is willing to engage where possible with relevant stakeholders to facilitate the attainment of the objectives set out in this draft river basin document.	Comment is noted.	The Register of Plans and Programmes has been updated.

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dRBM PCon3 8/5	John Arneill	Ballynure Angling Club	The plans also need to illustrate how WFD will be integrated with Flood Risk Strategies, Water Company Water Resources Plans, Fisheries Action Plans, development plans ie to ensure holistic management and integrated resources. We believe that it is only be coordinating these initiatives into individual catchment based plans that full benefit can be gained and vitally, most efficient use be made of limited resources.	More details will be provided on the links between the RBMPs and other plans and programmes included in the RBMPs. The reader is directed to the 'Register of Plans and Programmes', a supporting web based document, for further information.	Integration of Plans and Programmes' has been updated.
dRBM PCon5 5/6	Jim Haughey	Ulster Angling Federation	The final RBMPs need also to illustrate how WFD will be integrated with Flood Risk Strategies, Water Company Water Resources Plans, Fisheries Action Plans, development plans, etc., to ensure holistic management and integrated resources. We believe that it is only by coordinating all these initiatives into individual catchment based plans that full benefit can be gained and, vitally, most efficient use be made of limited resources.	More details will be provided on the links between the RBMPs and other plans and programmes included in the RBMPs. The reader is directed to the 'Register of Plans and Programmes', a supporting web based document, for further information.	Integration of Plans and Programmes' has been updated.
dRBM PCon5 5/48	Jim Haughey	Ulster Angling Federation	Interaction with the State of the Environment Report for NI "Our Environment, Our Heritage, Our Future" Published by DOENI EHS March 2008 This is the State of the Environment Report for NI and it is complemented by the "NI Environmental Statistics Report" of January 2009 which is the first annual update report on the March 2008 document. These documents contain a series of important statements which impact directly on the content of the draft	Information on the status of lakes was provided in section 3.2 of each of the three River Basin Management Plans. In addition the status of individual lakes is provided in the River Basin Plan Interactive Map available on the NIEA website - <a href="http://www.ni-environment.gov.uk/">http://www.ni-environment.gov.uk/</a> . NIEA has subdivided the three River Basin Districts onto 26 Local Management Areas (LMAs), which are based on sub basin catchments. Details of these areas were included as part of the supporting	The RBMP will include more information on the measures required to meet the objectives in each of the 26 LMAs. As part of the RBMP

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			<p>RBMPs;Page 37 of The NI Environmental Statistics Report sets out the continuous deterioration in the water quality of our large lakes.This is particularly worrying as the Our Environment, Our Heritage, Our Future document on page 63 shows that agricultural fertilizer use fell by one third between 1999 and 2006. There is therefore a major problem with lake water quality which is not highlighted in the draft RBMPs.Page 80 of the Our Environment, Our Heritage, Our Future document says that "The biological state of our rivers gives greater cause for concern, and indicates some continuing deterioration, which needs further investigation and a programme of remedial action." However this concern is not stated in the RBMPs, and certainly no programme of remedial action is set out. Another example of Government making grand statements, and promises it does not keep. Page 155 of the Our Environment, Our Heritage, Our Future document says that "There is a significant need to develop new measures to address outstanding risks and achieve the goal of good ecological quality." (our underline) Where are the concrete proposals for these "new measures" in the RBMPs ? In fact section 5.2.5 e) states that it will be 2015 before catchment management plans are developed, and then only for priority catchments - a case of too little, too late. Page</p>	<p>documentation for the consultation on the draft plans. The LMAs are being used as the level at which measures will be set and it is planned to develop action plans to implement the RBMPs in these areas. The action plans will be implemented on a three year rolling programme to allow resources to be targeted.</p>	<p>Implementation Programme actions plans will be developed for each LMA in liaison with stakeholder groups active in those areas</p>

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			159 of the Our Environment, Our Heritage, Our Future document says that “There is a need to adapt our management of the environment now to take account of the predicted changes in our climate.” (our underline) The RBMPs are simply ignoring this commitment by Government, and this is a glaring omission in the plans.		
dRBM PCon6 4/5	Lavene Bell	QPANI	Aggregates Levy Credit Scheme (ALCS) is programmed to 2011; QPANI is in liaison with the Department of Environment and HM Revenue & Customs to extend ALCS and the derogation from the levy for registered companies. This is a voluntary mechanism linked with the Programme of Measures that NIEA can endorse post-2011 to model with the RBMPs six-yearly cycles.	Section on Industry & other businesses has been updated.	Section on Industry & other businesses has been updated.

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dRBM PCon6 6/11	Andrew McDownell	National Trust	<p>The Registers of Plans and Programmes do list other key planning documents but fail to make detailed linkages between these and the RBMP process.</p> <p>We wholeheartedly agree that “it is necessary to maintain and strengthen links between land use planning and river basin planning to ensure the successful delivery of the requirements of the WFD”. We would like to see a situation where River Basin Plans are sufficiently detailed to have an effective role in land use planning (the completion of area plans etc.) and vice versa.</p>	<p>More details will be provided on the links between the RBMPs and other plans and programmes included in the RBMPs. The reader is directed to the 'Register of Plans and Programmes', a supporting web based document, for further information.</p>	<p>Integration of Plans and Programmes' has been updated.</p>
dRBM PCon6 6/19	Andrew McDownell	National Trust	<p>While NIEA has stated during information and stakeholder meetings that there has been significant coordination with relevant bodies in the Republic of Ireland, this is not adequately reflected in the draft plans themselves.</p> <p>Specifically, it would have been preferable if a single draft plan document had been produced for the international districts, encompassing North and South. We hope that NIEA can build on the links forged with colleagues in the Republic to make more explicit connections in the finalised plans (greater cross-referencing etc.).</p>	<p>There is currently good cooperation on a North South basis on technical issues including the monitoring of shared water bodies. This is coordinated through the North South Technical Advisory Group, which includes representatives of NIEA, EPA, AFBI and Fishery Boards. The objectives for the shared water bodies within the North Western and Neagh Bann International Basin Districts (IRBDs) have been agreed on a North South basis and were published as part of the Tier 1 documents for each IRBD. The same approach has been followed for the RBMPs to be published in December 2009.</p>	<p>An updated Tier 1 document will be published for each IRBD. In addition a North South Implementation Group comprising NIEA, Donegal County Council and Monaghan County will be established to support the implementation of measures in</p>



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					the shared water bodies. The Group will initially meet on a quarterly basis, with the start up meeting planned for Spring 2010.
dRBM PCon6 6/22	Andrew McDowell	National Trust	The draft plans recognise the key role that NI Water will play in pressures and measures. As a result, they could beneficially make linkages with NI Water's Water Resource Plans and other strategies.	DRD Water Policy Division are investigating the benefits of a planning policy statement for water and sewerage services. This policy would help clarify the roles and responsibilities of those involved in delivering services. The policy could also take account of key strategies such as the Regional Development Strategy NI Sustainable Development Strategy and also area plans. NIW has begun producing its Water Resource Management Plans and should have draft output ready hopefully by May 2010. NIW intends to work closely with DRD Water Policy Division, NIEA, NIAUR and other key stakeholders to ensure the Water Resource Management Plans integrate with relevant policies and strategies in NI. NI Water Operations team has produced a drought management plan for internal NIW use. A more formal drought management plan will be produced on completion of the Water Resource Management Plan. In addition NIW has a current water resource strategy 2002 - 2030 which has generated and	Integration of Plans and Programmes' has been updated

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				<p>continues to generate capital expenditure in relation to water resources. The strategy is however long term and is subject to review on a regular basis. At present NIW is in the process of reviewing and updating the strategy using current methodologies for water resource planning which have been developed since the 2002 - 2030 strategy was produced. The strategy will also be referred to as a water resource management plan which is in line with the current process in GB. More details will be provided on the links between the RBMPs and other plans and programmes included in the RBMPs. The reader is directed to the 'Register of Plans and Programmes', a supporting web based document, for further information</p>	
dRBM PCon6 8/15	Patrick Case ment	CNCC	<p>Council has concerns that there are inadequate linkages between implementation bodies in NI and in the Rol. Notwithstanding the existence of the North South Framework Directive Coordination Group, there is a lack of detail in the Plans as to how cross-border issues will be dealt with, particularly where activities in one state are impacting on the water bodies of the other. A practical example of this is the 6 sand and gravel extraction businesses that are currently active in the River Foyle, where their operations are having a deleterious effect on shellfish.</p>	<p>There is currently good cooperation on a North South basis on technical issues including the monitoring of shared water bodies. This is coordinated through the North South Technical Advisory Group, which includes representatives of NIEA, EPA, AFBI and Fishery Boards. The objectives for the shared water bodies within the North Western and Neagh Bann International Basin Districts (IRBDs) have been agreed on a North South basis and were published as part of the Tier 1 documents for each IRBD. The same approach has been followed for the RBMPs to be published in December 2009. The Loughs Agency is a North South Agency with jurisdiction in both Lough</p>	<p>An updated Tier 1 document will be published for each IRBD. In addition a North South Implementation Group comprising NIEA, Donegal County Council and Monaghan County will be established to</p>

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				Foyle and Carlingford Lough, which includes responsibilities for shellfing licensing and management. The concerns re the sand and gravel extractions will be passed to the Agency.	support the implementation of measures in the shared water bodies. The Group will initially meet on a quarterly basis, with the start up meeting planned for Spring 2010.
dRBM PCon6 8/18	Patrick Case ment	CNCC	In the absence of any detail of how the Marine Bill will be implemented in NI and particularly the MMO aspects, there is a need for great care to ensure the aims of both are aligned with those of the WFD. It is for consideration that a new stakeholder body be created to deal with this issue.	NIEA will discuss with PEPG how stakeholder engagement is best taken forward covering both WFD and and the new developments in marine legislation. The WFD Catchment Stakeholder Groups do currently examine marine issues as these arise. We will seek to ensure that there is minimal overlap if a marine-specific stakeholder group is introduced.	In light of the timescales, the RBMP can only refer to the developments in marine legislation. These will further improve existing controls.

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dRBM PCon6 9/8	Stuart Wightman	DRD WPD	The local levels of ambition within the plans must take account of area plans which set out levels of development and any supporting infrastructure required. NI Water's drainage area plans, developing flood risk management plans, plans for economic development, and the NI Sustainable Development Strategy should also be given consideration in setting water quality targets associated with WFD.	More details will be provided on the links between the RBMPs and other plans and programmes included in the RBMPs. The reader is directed to the 'Register of Plans and Programmes', a supporting web based document, for further information	Integration of Plans and Programmes' has been updated
dRBM PCon8 0/2	P.McCruden	Rivers Agency	The most significant pressures are identified from a water quality viewpoint only. However, some 46,000 properties in Northern Ireland are situated within the river and coastal floodplain. In addition there are many others that are affected by other sources of flooding such as surface water. While investment in flood alleviation has reduced the risk to people and property a significant element of risk remains. It is likely that urban development and climate change will result in an increase in the numbers at risk. The August 2008 flooding has been a reminder, if one was needed, of the very real impact flooding can have on people's lives. The management of flood risk and its impact on people and property is obviously the key issue in Northern Ireland's approach to the Floods Directive. The need to co-ordinate and balance the aims of the Water Framework Directive and the Floods Directive needs to be more firmly	Rivers Agency has established the Northern Ireland Floods Directive Steering Group which will provide the strategic direction for implementation of the Floods Directive. A Northern Ireland Floods Directive Stakeholder Group has been established to contribute to the development of policies to deliver catchment based Flood Risk Management Plans to reduce risk and assist in achieving environmental objectives of the Water Framework Directive. NIEA is represented on both groups. NIEA will have further discussions with RA regarding this. More details will be provided on the links between the RBMPs and other plans and programmes included in the RBMPs. The reader is directed to the 'Register of Plans and Programmes', a supporting web based document, for further information	Section on Abstraction and Flow regulation has been updated .

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			<p>embedded and explicitly stated within the document to give real effect to the aspirations for synergy and coordination.</p> <p>The Strategic Flood Map - Rivers and Sea, published last year, identifies the river and coastal flood plains. Its use for land use planning is of relevance to the water environment and should be referenced in the Draft River Basin Management Plans.</p>		
dRBM PCon8 3/8	Mark Henderson	Coleraine Anglers Association	<p>The final RBMPs need also to illustrate how WFD will be integrated with Flood Risk Strategies, Water Company Water Resources Plans, Fisheries Action Plans, development plans, etc., to ensure holistic management and integrated resources. We believe that it is only by coordinating all these initiatives into individual catchment based plans that full benefit can be gained and, vitally, most efficient use be made of limited resources.</p>	<p>More details will be provided on the links between the RBMPs and other plans and programmes included in the RBMPs. The reader is directed to the 'Register of Plans and Programmes', a supporting web based document, for further information</p>	<p>Integration of Plans and Programmes' has been updated</p>

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dRBM PCon8 6/8	David Howard	Bangor Angling Club	The final RBMPs need also to illustrate how WFD will be integrated with Flood Risk Strategies, Water Company Water Resources Plans, Fisheries Action Plans, development plans, etc., to ensure holistic management and integrated resources. We believe that it is only by coordinating all these initiatives into individual catchment based plans that full benefit can be gained and, vitally, most efficient use be made of limited resources.	More details will be provided on the links between the RBMPs and other plans and programmes included in the RBMPs. The reader is directed to the 'Register of Plans and Programmes', a supporting web based document, for further information	Integration of Plans and Programmes' has been updated
dRBM PCon9 0/26	Clerk to the Environment Committee & Committee for Regional Development	Committee for Regional Development and Environment Committee	Water industry groups highlighted the ways in which the draft River Basin Management Plans feed into areas of their work, specifically how early knowledge and understanding of the standards and actions required assisted the industry to efficiently plan and deliver its investment. However, one of these organisations responding was of the view that it would be beneficial to identify the current linkages to other plans and programmes within the document as this would provide a clearer view of the holistic effect of striving to meet the targets outlined.	More details will be provided on the links between the RBMPs and other plans and programmes included in the RBMPs. The reader is directed to the 'Register of Plans and Programmes', a supporting web based document, for further information.	Integration of Plans and Programmes' has been updated.
dRBM PCon9 0/27	Clerk to the Envir	Committee for Region	The linkages between the draft River Basin Management Plans and other plans and programmes were not sufficiently clear for those	More details will be provided on the links between the RBMPs and other plans and programmes included in the RBMPs. The reader is directed to	Integration of Plans and Programmes'

Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
	onment Committee & Committee for Regional Development	al Development and Environment Committee	organisations with environmental interests which responded to this question.	the 'Register of Plans and Programmes', a supporting web based document, for further information.	has been updated.
dRBM PCon9 0/28	Clerk to the Environment Committee & Committee for Regional Development	Committee for Regional Development and Environment Committee	The view was expressed that the daughter directives of the WFD, such as the Floods Directive and the Ground Water Directive were essential to delivering on the Water Framework Directive, but were insufficiently linked to the draft RBMPs. It was stated that a more integrated approach would present opportunities for benefits, for example the catchment management approach to river basin management is very appropriate framework for flood management. It was also suggested that the Plans should describe how they have been integrated with Northern Ireland Water's Water Resource Plans.	In transposing the Floods Directive, Rivers Agency (through its parent Department DARD NI), does not have the power/remit to add to or take from the requirements of the Floods Directive which is European legislation. NIEA is represented on the both Flood Directive Steering Group and the NI Stakeholder Group, which have been set by DARD Rivers Agency. DRD Water Policy Division are investigating the benefits of a planning policy statement for water and sewerage services. This policy would help clarify the roles and responsibilities of those involved in delivering services. The policy could also take account of key strategies such as the Regional Development Strategy NI Sustainable Development Strategy and also area plans. NIW has begun producing its Water Resource Management Plans and should	

Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
				<p>have draft output ready hopefully by May 2010. NIW intends to work closely with DRD Water Policy Division, NIEA, NIAUR and other key stakeholders to ensure the Water Resource Management Plans integrate with relevant policies and strategies in NI.</p> <p>NI Water Operations team has produced a drought management plan for internal NIW use. A more formal drought management plan will be produced on completion of the Water Resource Management Plan. In addition NIW has a current water resource strategy 2002 - 2030 which has generated and continues to generate capital expenditure in relation to water resources. The strategy is however long term and is subject to review on a regular basis. At present NIW is in the process of reviewing and updating the strategy using current methodologies for water resource planning which have been developed since the 2002 - 2030 strategy was produced. The strategy will also be referred to as a water resource management plan which is in line with the current process in GB.</p> <p>More details will be provided on the links between the RBMPs and other plans and programmes included in the RBMPs. The reader is directed to the 'Register of Plans and Programmes', a supporting web based document, for further information</p>	



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dRBM PCon9 2/2	Rosemary Mulholland	Craigavon Borough Council	4.Many local authorities in Northern Ireland have employed a Local Biodiversity Officer, to produce a Local Biodiversity Action Plan (LBAP). Many of the LBAPs include watercourses and their associated habitats and species. Most will have reference to Alien Invasive Species. The Craigavon LBAP includes actions for Standing Open Water and Canals and the control of Invasive Alien Species. A copy is available on request from the Lough Neagh Discovery Centre, Oxford Island.	Comment is noted. The LBAPS will be included in the Registers of Plans and Programmes appropriate to each of the RBDs.	Register of Plans and Programmes has been updated..
dRBM PCon9 3/28	CSG Meeting: Strangford and Lecale	CSG Meeting: Strangford and Lecale	Attempts to improve water environment may transfer 'problems' to other parts of the environment eg air, built environment. SEA considers that new WFD measures will not have a negative effect on the wider environment. Eg Improvement of small sewage works	The SEA of the RBMP will ensure that the plans are robust in the context of the wider environment. Where negative impacts are identified mitigation measures are recommended to reduce or eliminate the impact.	The SEA environmental statement will be published alongside the RBMPs.

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dRBM PCon9 4/10	CSG Meeting: Belfast Lough and Lagan	CSG Meeting: Belfast Lough and Lagan	<p>Need for local plans</p> <ul style="list-style-type: none"> <li>- Listing of relevant plans</li> <li>- Local pressures to stop pollution – eg Seymour Hill residents</li> <li>- Develop better links with Agriculture plans – enforcements and regulations – rainwater – weather effects on farmers etc.</li> <li>- Flood plains – leaving land available</li> <li>- NASCO – catchment management plans FCB and DCAL working with farmers.</li> </ul>	More details will be provided on the links between the RBMPs and other plans and programmes included in the RBMPs. The reader is directed to the 'Register of Plans and Programmes', a supporting web based document, for further information.	Integration of Plans and Programmes' has been updated.
dRBM PCon9 5/9	CSG Meeting: Bush and Glens	CSG Meeting: Bush and Glens	<p>5.0-Planning policies and plans.</p> <ul style="list-style-type: none"> <li>-AONB management.</li> <li>-ICZM Integrated Coastal Zone Management.</li> <li>-ASSI/SAC/SPA Management Plans.</li> <li>-EU landscape convention.</li> <li>-Signpost linkages in our documentation helps. AONB plans have done this.</li> <li>-Strategy layer of legislation from EU.</li> <li>Joined up and intelligent government needed.</li> </ul>	More details will be provided on the links between the RBMPs and other plans and programmes included in the RBMPs. The reader is directed to the 'Register of Plans and Programmes', a supporting web based document, for further information.	Integration of Plans and Programmes' has been updated.
dRBM PCon9 5/10	CSG Meeting: Bush and Glens	CSG Meeting: Bush and Glens	<p>5.1-SEA on planning policies not carried out – major impact.</p> <ul style="list-style-type: none"> <li>-Can not see planning using dRBMPs in their work.</li> <li>-Agriculture took it on in time with NAP.</li> <li>-Important not to increase pollution load, especially not “planned pollution load.</li> <li>-Illegal tipping in small wetlands (all come into RAMSAR, but not individually designated. Such</li> </ul>	More details will be provided on the links between the RBMPs and other plans and programmes included in the RBMPs. The reader is directed to the 'Register of Plans and Programmes', a supporting web based document, for further information.	Integration of Plans and Programmes' has been updated.

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			<p>tipping then receives retrospective planning permission.</p> <p>-DOE - as planning and environmental regulation body – conflict of interest. (Kenya the only other country known to that stakeholder group member to have a similar system.) Planning will go to local councils again (good/bad move??).</p> <p>Invasive species and weeds. Hard calls. Who will pay for existing problems? – Research and interpretation needed.</p> <p>-Never a look at entire assessed base – creeping development.</p> <p>-Need to look more strategically at the whole of Northern Ireland.</p> <p>-Is the Water Framework Directive Really a priority for the government as a whole, for all departments? NIEA competent authority – sign up across government.</p>		
dRBM PCon9 5/12	CSG Meeting: Bush and Glens	CSG Meeting: Bush and Glens	5.3-Local Biodiversity Action Programme (LBAP) tie in both directions.	Comment is noted. The LBAPS will be included in the Registers of Plans and Programmes appropriate to each of the RBDs.	Register of Plans and Programmes has been updated..

Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
dRBM PCon9 7/7	CSG Meeting: Lower Neagh Bann	CSG Meeting: Lower Neagh Bann	5.0 - Public meeting with environmental companies with regards to the plans. - Countryside Management Scheme – River corridor options in stream works. - Recognition of river corridors in area plans. Reinforce this idea to planners. - SEPA funding – River restoration.	DARD agri-environment schemes aim to deliver high quality 'public goods/ecosystem services for communities in Northern Ireland by improving the environment and the countryside through land management. One of the NICMS aims is to assist in the implementation of the Water Framework Directive. Effective pollution control is central to the scheme and a number of water specific management options are contained in the scheme. There were specific measures in the draft plan to address diffuse pollution The Department is considering what further mechanisms are required to ensure the River Basin Management Plans are integrated into the overall planning process including the Strategic Development Strategy and Development Area Plans.	Section on Agriculture has been updated .
dRBM PCon9 8/9	CSG Meeting: Carlingford and Mourne	CSG Meeting: Carlingford and Mourne	5.0-From Before Integrating Planning Service Plans. -Agriculture plans. -Plans to work in rivers with all stakeholders, affected statutory consultees and beyond. Hydro-electric schemes specifically. -Application process fairly new, which is regulated through NIEA. -Linkages between government organisations and bodies. Loughs Agency is not a statutory consultee here. -Making individuals with public bodies know, who	More details will be provided on the links between the RBMPs and other plans and programmes included in the RBMPs. The reader is directed to the 'Register of Plans and Programmes', a supporting web based document, for further information. As the body responsible for implementing the Water Framework Directive, the Department of the Environment has set up the Water Framework Directive Implementation Working Group (IWG). This is made up of representatives from the departments/agencies that are responsible for	Integration of Plans and Programmes' has been updated.

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			<p>need to know and don't always know. Talk to right individuals with big organisations is difficult.</p> <ul style="list-style-type: none"> <li>-Implementation group for Water Framework Directive (WFD) at a higher level – four government departments named in WFD.</li> <li>-Risk – local council reorganisation</li> </ul>	<p>implementation of the plans, including Regional Development, Culture, Arts &amp; Leisure, Agriculture, and Rural Development, River's Agency, Planning Service, Lough's Agency and Forest Service. The minutes of previous meetings of the IWG can be accessed at <a href="http://www.ni-environment.gov.uk/water-home/roles/coordinating_production_of_draft_rbmps_with_partners.htm">http://www.ni-environment.gov.uk/water-home/roles/coordinating_production_of_draft_rbmps_with_partners.htm</a></p>	
dRBM PCon1 01/5	CSG Meeting: Erne and Melvin	CSG Meeting: Erne and Melvin	<p>5.0- Cavan and Monaghan County Councils have introduced bylaws on septic tanks. We need to do the same – suitability of soil etc.</p> <ul style="list-style-type: none"> <li>- CSG meetings provide good linkage.</li> <li>- Need to go back to organisation and discuss these questions in more detail.</li> </ul>	<p>NIEA has undertaken work to examine the impacts of a dispersed population pattern on water quality and to inform proposals for future legislation, policies and procedures to address pollution related to wastewater treatment provision in rural areas. It is expected this work on the dispersed settlement pattern will be completed in late 2009 and it will help inform NIEA as to the way forward. Consultations on policy decisions will be advertised widely and comments received/acted upon in the normal manner. Timeframes for completion of the work have not been confirmed. This work package has considered policies currently used by both UIK and ROI agencies.</p>	Supplementary measure included in RBMP.

## 5 River Basin Management Plans and working together on implementation

### 5.1 Cross border

Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
dRBM PCon4 5/1	Milton Matthews	Public	<p>The fact that this NWI River Basin District has an international dimension brings with it challenges and opportunities. In this regard sound, manageable and enforceable corporate governance is fundamental to plan delivery.</p> <p>The Lough Melvin Management Plan contains a flavour of specific measures in the context of WFD but deals specifically with the issue of cross border corporate governance. This particular plan should be viewed as a template for cross border catchments and we feel for this reason that it should be included in the document store and specifically referred to under the heading 'shared water issues'.</p>	<p>There is currently good cooperation on a North South basis on technical issues including the monitoring of shared water bodies. This is coordinated through the North South Technical Advisory Group, which includes representatives of NIEA, EPA, AFBI and Fishery Boards. The objectives for the shared water bodies within the North Western and Neagh Bann International Basin Districts (IRBDs) have been agreed on a North South basis and were published as part of the Tier 1 documents for each IRBD. The same approach has been followed for the RBMPs to be published in December 2009.</p>	<p>An updated Tier 1 document will be published for each IRBD. In addition a North South Implementation Group comprising NIEA, Donegal County Council and Monaghan County will be established to support the implementation of measures in the shared water bodies. The Group will initially meet on a quarterly</p>

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					basis, with the start up meeting planned for Spring 2010.
dRBM PCon90/3	Clerk to the Environment Committee & Committee for Regional Development	Committee for Regional Development and Environment Committee	One group with an environmental interest was broadly supportive of the objectives and level of importance set for Northern Ireland's water environment. However this tempered by a concern that, because two of the three river basins were cross-border, it would be very difficult to determine the level of importance set by the government in the Republic of Ireland until a body of data existed from the sampling points which could be reviewed and assessed in practice.	There is currently good cooperation on a North South basis on technical issues including the monitoring of shared water bodies. This is coordinated through the North South Technical Advisory Group, which includes representatives of NIEA, EPA, AFBI and Fishery Boards. The objectives for the shared water bodies within the North Western and Neagh Bann International Basin Districts (IRBDs) have been agreed on a North South basis and were published as part of the Tier 1 documents for each IRBD. The same approach has been followed for the RBMPs to be published in December 2009.	An updated Tier 1 document will be published for each IRBD. In addition a North South Implementation Group comprising NIEA, Donegal County Council and Monaghan County will be established to support the implementation of measures in the shared water bodies. The Group will initially meet on a quarterly basis, with the start up meeting planned for Spring 2010.

## 5.2 Final Plans

Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
dRBM PCon1 0/3	Dr Bob Com mon	Public	Section 2 - More summary information would be helpful on the primary and secondary river basins i.e. their area and stream orders i.e. 3rd or 4th would be helpful.	NIEA has subdivided the three River Basin Districts into 26 Local Management Areas (LMAs), which are based on sub basin catchments. NIEA are developing information leaflets on each Local Management Area and this should provide more information on the primary and secondary river basins and their water quality.	The RBMP will include more information on the measures required to meet the objectives in each of the 26 LMAs. As part of the RBMP Implementation Programme actions plans will be developed for each LMA in liaison with stakeholder groups active in those areas.



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dRBM PCon10/4	Dr Bob Common	Public	Section 3 - Good level of aspiration indicated. Forthcoming document in Dec 2009 should indicate basic priorities, phased innovations and short term contingency plans are presented for the water environ in the NE region	NIEA has subdivided the three River Basin Districts into 26 Local Management Areas (LMAs), which are based on sub basin catchments. Details of these areas were included as part of the supporting documentation for the consultation on the draft plans. The LMAs are being used as the level at which measures will be set and it is planned to develop action plans to implement the RBMPs in these areas. The action plans will be implemented on a three year rolling programme to allow resources to be targeted. NIEA will be reviewing its communication strategy as part of the Implementation Programme for the LMA action plans.	The RBMP will include more information on the measures required to meet the objectives in each of the 26 LMAs. As part of the RBMP Implementation Programme actions plans will be developed for each LMA in liaison with stakeholder groups active in those areas
dRBM PCon23/5	Clair Cockrill	Freshwater Task Force	The Plans should be presented in a way that sets out content more clearly and concisely and that facilitates easy access to all information. The Plans should be presented in a way that they can easily be understood by the general public.	Comment noted.	The format and layout of the RBMP and website have been revised to improve access.

Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
dRBM PCon2 3/20	Claire Cockerill	Freshwater Task Force	Additional information on why surface water bodies and ground waters are failing is required if the measures for achieving improvement are to be assessed. An explanation is required as to why a water body will not achieve good ecological status as well information on the process undertaken by NIEA to arrive at this decision. In particular more information is needed on how the presence of invasive species impacts on the classification and if irremovable will the water body ever improve in terms of classification	Further work has been carried out to clearly identify where "new measures" over and above current basic measures will be required to meet the objectives set out in the plans. The information provided in the plans will include reasons for setting alternative objectives, linking measures to the objectives and where relevant measures for protected areas under the Habitats and Birds Directives. NIEA has subdivided the three River Basin Districts onto 26 Local Management Areas (LMAs) , which are based on sub basin catchments. Details of these areas were included as part of the supporting documentation for the consultation on the draft plans. The LMAs are being used as the level at which measures will be set and it is planned to develop action plans to implement the RBMPs in these areas. The action plans will be implemented on a three year rolling programme to allow resources to be targeted	The RBMP will include more information on the measures required to meet the objectives in each of the 26 LMAs. As part of the RBMP Implementation Programme actions plans will be developed for each LMA in liaison with stakeholder groups active in those areas

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dRBM PCon2 3/22	Clair e Cockerill	Freshwater Task Force	<p>A significant improvement to the main plan documents, in terms of highlighting the problems, would be if they were to contain pie charts, diagrams and tables that clearly explain in simple terms the following:</p> <ul style="list-style-type: none"> <li>• The elements that are less than good status across the RBD;</li> <li>• Apportionment of pressures per polluting /damaging sector where this is known – this will demonstrate how the ‘polluter pays’ principle is being adhered to;</li> <li>• The percentage of failures caused by a known pressure, and the percentage of failures with an unknown cause;</li> <li>• The principal pressures causing the current status where it is below ‘Good’ across the RBD - e.g. ammonia from sewage treatment works, channel modification, phytoplankton blooms;</li> <li>• The key measures proposed to address the main areas for failure and costs;</li> <li>• The number of water bodies that have been designated HMWBs and the percentage of each type of modification e.g. flood defence, navigation.</li> </ul> <p>All of the above additions are essential if the main document is to establish strategic overview of the problems at a river basin level and would be helpful in determining and targeting measures at a catchment and RBD level.</p>	<p>NIEA has subdivided the three River Basin Districts onto 26 Local Management Areas (LMAs) , which are based on sub basin catchments. Details of these areas were included as part of the supporting documentation for the consultation on the draft plans. The LMAs are being used as the level at which measures will be set and it is planned to develop action plans to implement the RBMPs in these areas. The action plans will be implemented on a three year rolling programme to allow resources to be targeted. In support of the LMAs detailed information leaflets will be produced to provide further details covering a number of the areas listed.</p>	<p>The RBMP will include more information on the measures required to meet the objectives in each of the 26 LMAs. As part of the RBMP Implementation Programme actions plans will be developed for each LMA in liaison with stakeholder groups active in those areas. Information leaflets will also be made available for each LMA.</p>

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dRBM PCon2 3/61	Claire Cockerill	Freshwater Task Force	6.2. The Taskforce acknowledges the Agency's view that the Plans are not static and will continue to be amended throughout the first 6-year cycle. However, the Freshwater Taskforce believes that given the current level of outstanding work that remains to be completed in order to fully inform the RBMPs, it is essential that provision is made for stakeholders to comment on the revised Plans before they are finalised, following Article 14 of the Directive.	The timetable for the production of the plans does not allow for a second round of consultation. However there will be ongoing engagement with stakeholders as part of the implementation programme for the plans. NIEA has subdivided the three River Basin Districts onto 26 Local Management Areas (LMAs), which are based on sub basin catchments. Details of these areas were included as part of the supporting documentation for the consultation on the draft plans. The LMAs are being used as the level at which measures will be set and it is planned to develop action plans to implement the RBMPs in these areas. The action plans will be implemented on a three year rolling programme to allow resources to be targeted.	The RBMP will include more information on the measures required to meet the objectives in each of the 26 LMAs. As part of the RBMP Implementation Programme actions plans will be developed for each LMA in liaison with stakeholder groups active in those areas

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dRBM PCon2 3/118	Clair e Cock erill	Freshw ater Task Force	<ul style="list-style-type: none"> <li>• More detailed information should be made available on the extent to which sewerage leaks are a problem at local area scale. This should be included in Local Area Management Plans.</li> </ul>	There is an ongoing program of drainage area studies that determine the hydraulic performance of sewers. This information will feed into the POM and the LMA Plans.	The RBMP will include more information on the measures required to meet the objectives in each of the 26 LMAs. As part of the RBMP Implementation Programme actions plans will be developed for each LMA in liaison with stakeholder groups active in those areas
dRBM PCon2 3/131	Clair e Cock erill	Freshw ater Task Force	<p>5.6 Industry and Other Business</p> <ul style="list-style-type: none"> <li>• The figures given for pollution incidents relating to industry are from 2006 and for the whole of NI. The Taskforce request that the most up to date figures are given for each RBD.</li> </ul>	Water Pollution and Enforcement statistics are regularly published on the NIEA website. The figures are currently on the website up to and including those for 2007. The 2008 figures have been validated and the relevant report is in production. Following Ministerial approval, the report will be added to the website along with the previous year's reports at <a href="http://www.ni-environment.gov.uk/water-home/waterpollution/pol_respon.htm">http://www.ni-environment.gov.uk/water-home/waterpollution/pol_respon.htm</a>	Section on Industry and Other Businesses has been updated.

Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
dRBM PCon2 3/149	Clair e Cock erill	Freshw ater Task Force	Also under the actions already being taken the Draft Plan goes into considerable lengths to advise the reader of the different angling initiatives that have happened over the years. However there is little point in having these in the Draft Plan when these initiatives are complete. In some cases work completed under these schemes has been destroyed by subsequent pollution incidents! In particular the Angling Development Programme 2002-2006.	Comment is noted.	Section on Fisheries has been updated.
dRBM PCon2 4/13	Bren dan Kerr	Natural living Assets	The following need to be considered in future plans <ul style="list-style-type: none"> <li>*Habitat Protection</li> <li>*True contextual value of habitat</li> <li>*Ecological value/ Ecological added value</li> <li>*Ecological opportunity cost</li> <li>*Trans- departmental communication</li> <li>*Adding value role for Angling Clubs and community groups</li> <li>*Development of community based rivers trusts</li> <li>*Liaison communication and understanding with other groups</li> <li>*Commitment to policing and environmental leadership.</li> <li>*EHS needs to give leadership to support the community in its aims to take responsibility for environmental and community policing.</li> <li>*Commitment to empower local communities to be educated, learn and deliver on meeting needs for River Basin Management Plans.</li> </ul>	Comment is noted. NIEA see the development of Local Management Area action plans as an important step in taking forward the type of issues raised. NIEA has subdivided the three River Basin Districts onto 26 Local Management Areas (LMAs), which are based on sub basin catchments. Details of these areas were included as part of the supporting documentation for the consultation on the draft plans. The LMAs are being used as the level at which measures will be set and it is planned to develop action plans to implement the RBMPs in these areas. The action plans will be implemented on a three year rolling programme to allow resources to be targeted.	The RBMP will include more information on the measures required to meet the objectives in each of the 26 LMAs. As part of the RBMP Implementation Programme actions plans will be developed for each LMA in liaison with stakeholder groups active in those areas

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			<ul style="list-style-type: none"> <li>*Socio economic factors need to be incorporated into decision making.</li> <li>*Specifically the value of sustainable fish, fisheries and angling tourism.</li> <li>*Leadership in NI. Communication with other agencies.</li> <li>*Factoring in economic and socioeconomic value for the added benefits of clean rivers.</li> <li>*Clamping down on litter and general use of rivers as a cheap facility for Fly – tipping!</li> <li>*Time frame for implementation</li> <li>*Continued support for Nitrates Action Programmes &amp; Farm Payment schemes</li> <li>*Capital works programme NI water</li> <li>*Strategic Environment Assessment Directive</li> <li>*Natura 2000 and ASSI designation</li> </ul>		
dRBM PCon2 6/7	Cathy Burns	Lagan Canal Restoration Trust	Additional Comments. There is no mention of what remains of the Lagan Canal in the Neagh Bann district area – Aghagallon area. There is a lack of consideration of recreation and leisure use of the river Lagan and Lough Neagh area, in particular for navigation and canal use.	Comment noted. Canals are included as heavily modified water bodies or artificial water bodies. Both terms are explained in the summary Plan. Local Heavily modified water bodies can be viewed on the interactive web map. Also, canals designated under the Freshwater Fish Directive as cyprinid (coarse fish) are reported along with their compliance in the summary RBMP and on the web map.	Section on Heavily modified water bodies has been updated.



Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
dRBM PCon3 5/3	Jim Bradley	Belfast Hills Partnership	<p>The following are specific comments on sections at the page numbers outlined:-</p> <p>Page 52 Urban pollution management (bottom of page). This is very weak in terms both of the work outlined and action on the ground. An indication of numbers of such pollution incidents and the percentage where the pollution source was identified and the situation rectified satisfactorily would be useful.</p>	<p>By the end of June 2008:</p> <p>The upgrading of 3 sewerage systems had been completed, with construction ongoing in a further 9 areas.</p> <p>Formal agreements have been reached in principle on 21 schemes.</p> <p>Drainage area studies are ongoing in 52 areas. Drainage area studies will be produced for 14 areas in the future.</p> <p>Water Pollution and Enforcement statistics are regularly published on the NIEA website. The figures are currently on the website up to and including those for 2007. The 2008 figures have been validated and the relevant report is in production. Following Ministerial approval, the report will be added to the website along with the previous year's reports at <a href="http://www.ni-environment.gov.uk/water-home/waterpollution/pol_respon.htm">http://www.ni-environment.gov.uk/water-home/waterpollution/pol_respon.htm</a></p>	<p>Section on Urban development has been updated.</p>

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dRBM PCon3 5/4	Jim Bradley	Belfast Hills Partnership	P59 "The current measures are not adequate to prevent further deterioration due to urban drainage". While the honesty reflected in this statement is to be admired the sum of the proposed actions is not. Those outlined do not provide any source of confidence that further deterioration will be halted and real improvements made. More radical and innovative measures are required.	This statement is made in the context of anticipated changes to the management of stormwater. It is expected that the Planning process will seek to reduce the amount of run-off from new development sites. Opportunities for retrofit of sustainable drainage techniques will also be sought during redevelopment. The continuing investment in the sewerage network will reduce the impact of combined sewer overflows on urban streams and rivers. The consultation document "Managing Stormwater" has been issued with a closing date of 16 October 2009. The delivery of the strategy, when agreed, will be the responsibility of a number of Departments and government agencies and local authorities.	Section on Urban development has been updated.
dRBM PCon3 5/5	Jim Bradley	Belfast Hills Partnership	P60 Management of Misconnections. This is not strong enough with no indication given that misconnections will be proactively identified and rectified. A lack of will to carry this out is one of the major root causes of this continuing problem and one which saps the morale of those working to protect and improve water quality of key watercourses.	NIEA are aware of water pollution impacts associated with housing developments in certain areas in Northern Ireland where there are foul or combined sewage inputs into surface water drainage networks due to misconnections made during and/or after the construction phase of the developments or due to the presence of unknown linkages between those foul/combined and surface networks. The discharge from such Polluted Surface Water Outfalls is often referred to as 'grey' or 'sullage' water. When such mis-connections relate to a small housing development and are due to a single cause then remediation may be relatively straight forward. In relation to large	Section on Urban development has been updated.

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				<p>housing estates where the water quality impact is due to a number of mis-connection causes, often at individual house level, then the identification of the multiple causes and the associated remediation can be extremely burdensome on resources. However, NIEA continues to work closely with the relevant stakeholders, particularly Northern Ireland Water Ltd (NIWL), in order to prioritize and rectify such problems and are currently working together with NIWL in a number of areas. NIEA are currently examining the available best practice approaches employed by other environmental regulators with a view to adopting a similar good practice document for Northern Ireland.</p>	
dRBM PCon3 5/6	Jim Bradley	Belfast Hills Partnership	P66 It would be useful to have an indicative timetable for these actions (eg Forestry) even with a properly worded proviso that making such forecasts is very difficult.	<p>Most of the actions are now current practice. The current Forests and Water Guidelines are presently being revised taking account of the latest research and advice from a wide spectrum of water regulatory authorities and conservation agencies. Draft guidelines will be consulted on during Autumn 2009 with a target date of publication Summer 2010.</p>	Section on Forestry has been updated.

Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
dRBM PCon3 5/7	Jim Bradley	Belfast Hills Partnership	P72 This is a low number of monitored discharges given the total. More detail on the coverage of monitoring e.g. geographically would be useful. P76 Should planning legislation not be included as vital to the body of key legislation?	Compliance assessment monitoring is normally carried out where a discharge consent permits a maximum daily discharge of 5 cubic metres or more, or where the consent relates to significant site drainage discharges, such as those for quarries. This approach to sampling has been adopted to target resources in a cost effective way at those discharges which, because of their volume or composition, have the greatest pollution potential. For those discharges not routinely monitored, a low volume inspection programme is in place.	Section on Industry & other businesses has been updated.
dRBM PCon3 5/8	Jim Bradley	Belfast Hills Partnership	P81 There appear to be different definitions of good or moderate ecological potential for heavily modified water bodies on P21?	Comment noted and will be amended in the RBMP.	Carried forward for edits in the RBMP.
dRBM PCon3 5/9	Jim Bradley	Belfast Hills Partnership	P82 It is important that the length of waterbodies culverted and indeed re-opened is recorded and published. It is also vital that a stop is put to encroachment into rivers by installation of artificial banks. It would appear that this is carried out for health and safety reasons but then also allows further development beyond original site capacity. This is a sound additional reason for the already obvious need for a clear distance from any water body for all housing developments and this also needs to be stronger than guidance.	All these features would fall under hydromorphological regulation which is an issue currently being considered by the DOE Policy and Environmental Planning Group. The issue of the distance of housing from watercourses is also under consideration by Planning Service. In addition, developing hydromorphological assessments will bring the issue into more focus as any spread of such features will show in less than good hydromorphological classification. Rivers Agency maintain records (location/ownership) where the ownership of the undesignated culverts is known. There are many of the undesignated	Section on Freshwater Morphology has been updated.

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				culverts, where ownership is unknown. Rivers Agency do not maintain records for these culverts. Whilst the information is not published by Rivers Agency it is freely available on request. Much of the information is of a complex technical nature and would be of little use to the public. Rivers Agency does get requests from engineering consultants for detailed information on culverts which it supplies in a variety of formats to suit the circumstances. It should be noted that many culverts taking storm water discharge are in the ownership of NIWater and to a lesser extent Roads Service.	
dRBM PCon3 5/10	Jim Bradley	Belfast Hills Partnership	P115 Groundwater seems to have been forgotten in this final section, including monitoring of groundwater.	Comment noted and will be amended in the RBMP.	Carried forward for edits in the RBMP.
dRBM PCon3 9/6	Jennifer Robinson	The Consumer Council	The benefits are two-fold, widespread information gathering can lead to ideas previously not considered being highlighted and the public can see how they have made an impact the RBMPs giving the process more credibility. However, the draft RBMPs are lengthy and not conducive in aiding public participation further. The Consumer Council recognises the need for detailed RBMPs but NIEA should also consider a smaller summary version. The RBMPs documents need to be user-friendly, in an accessible format and easy to understand. If consumers are to be meaningfully	NIEA has subdivided the three River Basin Districts onto 26 Local Management Areas (LMAs) , which are based on sub basin catchments. Details of these areas were included as part of the supporting documentation for the consultation on the draft plans. The LMAs are being used as the level at which measures will be set and it is planned to develop action plans to implement the RBMPs in these areas. The action plans will be implemented on a three year rolling programme to allow resources to be targeted	The RBMP will include more information on the measures required to meet the objectives in each of the 26 LMAs. As part of the RBMP Implementation Programme actions plans

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			<p>involved it is vital that they understand the relevancy of how the RBMPs affect them, if this is established at the outset it could help in sustaining support and interest throughout implementation. In order to assist creating a better understanding NIEA may wish to explain the links between how the high level objectives translate into local improvements throughout the RBMPs. Practical examples could be used to illustrate how actions may benefit specific water bodies. One of the key elements of public engagement is the management of expectations. Being realistic about what can be done, within what timescale and the expected outcome creates a common direction for all those involved. Timescales of when the projects will be implemented and when benefits will be realised should be outlined in the RBMPs. Public engagement should not stop once the final RBMPs are published in December 2009. Regular information on progress towards achievement of the objectives should be publicly available. This will illustrate how the RBMPs are making a difference to quality of the water environment.</p>		<p>will be developed for each LMA in liaison with stakeholder groups active in those areas.</p>

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dRBM PCon4 0/10	Declan Lawlor	Loughs Agency	Reference should be made to Republic of Ireland document and vice versa.	Managing Our Shared Waters - Working Together - The Neagh Bann International River Basin District' and 'Managing Our Shared Waters - Working Together - The North Western River Basin District' are component parts of the Neagh Bann and North Western River Basin Management Plans. These documents outline the cooperation arrangements between the two jurisdictions, north and south, involved in implementing the Water Framework Directive in our shared waters. They set out the agreed mechanisms of coordination for implementation of the plans, including objective-setting and programmes of measures. They contain summary data and information for the whole of the Neagh Bann and North Western International River Basin Districts. Plans have also been prepared for the portions of the Neagh Bann and North Western Districts in Ireland. Copies are available from NIEA.	Update of the Managing our shared waters document will be published.
dRBM PCon4 0/11	Declan Lawlor	Loughs Agency	Implementation working group members should be named corporately.	As the body responsible for implementing the Water Framework Directive, the Department of the Environment has set up the Water Framework Directive Implementation Working Group (IWG). This is made up of representatives from the departments/agencies that are responsible for implementation of the plans, including Regional Development, Culture, Arts & Leisure, Agriculture, and Rural Development, River's Agency, Planning Service, Lough's Agency and Forest Service. The minutes of previous meetings of the IWG can be	The supporting document on Competent Authorities has been updated.

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					How the comments have been addressed in the RBMP
				accessed at <a href="http://www.ni-environment.gov.uk/water-home/roles/coordinating_production_of_draft_rbmps_with_partners.htm">http://www.ni-environment.gov.uk/water-home/roles/coordinating_production_of_draft_rbmps_with_partners.htm</a>	
dRBM PCon4 0/12	Declan Lawlor	Loughs Agency	Presentation of 'Water Matters' was easier to follow and should be replicated.	Comment is noted.	The format and layout of the RBMP and website have been revised to improve access.
dRBM PCon4 0/15	Declan Lawlor	Loughs Agency	The Loughs Agency education programme has been omitted and must be included.	Comment is noted.	Section on Education has been updated.
dRBM PCon4 0/16	Declan Lawlor	Loughs Agency	Map 3 only shows land portion of Northern Ireland.	Comment is noted.	Maps in the summary RBMP include coastal & transitional waterbodies.



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dRBM PCon4 0/17	Declan Lawlor	Loughs Agency	Heavily modified water bodies – definition and identification of such water bodies is needed i.e. a simplified definition in the glossary.	Comment is noted. Document to be made available.	A document on heavily modified waterbodies to be provided as a supporting document to the RBMP is being produced.
dRBM PCon4 0/18	Declan Lawlor	Loughs Agency	Tourism, angling and biodiversity are not even mentioned yet they all have an economic value. Gross Value Added – no tourism included!	The Department has engaged consultants to prepare a strategic impact assessment on costs and benefits of proposed new measures over and above basic measures that are required irrespective of WFD. The assessment will include the benefits to tourism. The strategic impact assessment will be included in the River Basin Management Plans to be published in December 2009. However it is recognised that further work will be required to capture the benefits of tourism at a local level.	The strategic impact assessment will be included in the River Basin Management Plans to be published in December 2009
dRBM PCon4 0/19	Declan Lawlor	Loughs Agency	Has the final classification system been agreed? If so, what is it?	The methodologies used to classify the status of water bodies are available on the NIEA website as part of the 'Quality of Our Water Environment' section. In classifying surface waters and groundwater, NIEA followed the guidance of the UK Technical Advisory Group. It recommended what should be included in classification and how data - including data on ecological and chemical quality - are combined and presented. The classification standards used are consistent across the UK and	Classification data has been updated to include 2009 data.

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				How the comments have been addressed in the RBMP	
				NIEA has been working with Ireland and other Member States to try to ensure Northern Ireland's classification schemes are comparable with those of Europe. Specific queries can be discussed with NIEA staff via Catchment Officers.	
dRBM PCon4 0/20	Declan Lawlor	Loughs Agency	Like to see link or named water bodies.	Details of individual water bodies are available on the interactive web map <a href="http://maps.ehsni.gov.uk/wmuvviewer/">http://maps.ehsni.gov.uk/wmuvviewer/</a>	The interactive web map has been updated.
dRBM PCon4 0/24	Declan Lawlor	Loughs Agency	Freshwater fish – eels need to be included.	Comment is noted.	Section on Fisheries has been updated.
dRBM PCon4 0/25	Declan Lawlor	Loughs Agency	Spelling error – coarse not course.	Comment is noted.	Carried forward for edits..
dRBM PCon4 0/27	Declan Lawlor	Loughs Agency	A small number of river waterbodies have not been assessed. Where is the transparency between rivers, lakes and transitional waterbodies?	All water bodies have been assessed for the RBMP and more detail on how their classification status is determined has been provided as part of the RBMP.	RBMP updated to include status of all water bodies.
dRBM PCon4 0/28	Declan Lawlor	Loughs Agency	What is the Extensive Regulatory Toolkit?	This relates to a range of control options for diffuse pollution. Options range from advice/guidance, to general binding rules through to consenting/authorisation in line with Better Regulation Principles.	Supplementary measures included in RBMP.

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dRBM PCon4 0/29	Declan Lawlor	Loughs Agency	Action point or restoration policy could be explained better (point 4).	Comment is noted.	Carried forward for edits
dRBM PCon4 0/33	Declan Lawlor	Loughs Agency	As they both have pollution control measures, the 1952 Foyle Fisheries Act and the 1966 Fisheries Act needs to be included.	Comment is noted.	Section on Agriculture has been updated to reflect this comment.
dRBM PCon4 0/35	Declan Lawlor	Loughs Agency	Where are the mechanisms that are going to identify priority catchments?	NIEA has subdivided the three River Basin Districts into 26 Local Management Areas (LMAs) , which are based on sub basin catchments. Details of these areas were included as part of the supporting documentation for the consultation on the draft plans. The LMAs are being used as the level at which measures will be set and it is planned to develop action plans to implement the RBMPs in these areas. The action plans will be implemented on a three year rolling programme to allow resources to be targeted	The RBMP will include more information on the measures required to meet the objectives in each of the 26 LMAs. As part of the RBMP Implementation Programme actions plans will be developed for each LMA in liaison with stakeholder groups active in those areas.

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dRBM PCon4 0/36	Declan Lawlor	Loughs Agency	The Foyle Fisheries Act 1952 and the Loughs Agency's role on education are missing from the table.	Comment is noted.	Section on Agriculture has been updated to reflect this comment.
dRBM PCon4 0/40	Declan Lawlor	Loughs Agency	Industry and other Business – new legislation for finfish needs to be highlighted.	Comment is noted.	Section on Industry & other businesses has been updated.
dRBM PCon4 0/41	Declan Lawlor	Loughs Agency	Loughs Agency key legislation needs to be included.	Comment is noted.	Section on Industry & other businesses has been updated.
dRBM PCon4 0/43	Declan Lawlor	Loughs Agency	PPS 19 should be delivered within the existing timeframe of the River Basin Management Plans.	The Department is committed to completing PPS 19 in order to contribute to a full suite of PPSs. PPS 19 has completed scoping stage following clearance the next stage is to proceed to drafting stage.	Section on Industry & other businesses has been updated.
dRBM PCon4 0/46	Declan Lawlor	Loughs Agency	Riverwatch clean-up programme to be included.	Comment is noted.	Section on Waste has been updated to reflect this comment.
dRBM PCon4 0/48	Declan Lawlor	Loughs Agency	Fisheries Acts missing.	Comment noted.	Section on Industry & other businesses has been updated.
dRBM	Declan Lawlor	Loughs Agency	Over first basin plan period = a prioritisation	NIEA has subdivided the three River Basin Districts	The RBMP will

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PCon40/53	an Lawlor	Agency	matrix developed?	onto 26 Local Management Areas (LMAs), which are based on sub basin catchments. Details of these areas were included as part of the supporting documentation for the consultation on the draft plans. The LMAs are being used as the level at which measures will be set and it is planned to develop action plans to implement the RBMPs in these areas. The action plans will be implemented on a three year rolling programme to allow resources to be targeted.	include more information on the measures required to meet the objectives in each of the 26 LMAs. As part of the RBMP Implementation Programme actions plans will be developed for each LMA in liaison with stakeholder groups active in those areas.

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dRBM PCon4 0/54	Declan Lawlor	Loughs Agency	Barriers to Fish – a strategic appraisal is to be undertaken by whom, when and using which method?	DCAL Fisheries Officers are working with NIEA who are processing applications for abstraction licenses. DCAL have expertise in this matter and commission AFBI if scientific assessments or monitoring is warranted. WFD requires river water bodies to be classified on a number of ecological elements, one of which is the status of native fish populations. Where obstacles to the free movement of migratory species exist, the ability of these species to access WFD water bodies will be impacted. An assessment of such impacts requires a methodology to estimate the ability of migratory species to pass a range of obstacles. SNIFFER is currently undertaking a project to develop a methodology for assessing the porosity of obstacles to fish. The project will allow authorities responsible for implementing WFD to classify impacts from barriers on fish migration using a consistent methodology. In addition the method will identify obstacles to be prioritised for removal or to have passage facilities installed, thus maximising ecological benefit to capital expenditure. NIEA and Loughs Agency are represented on the steering group for this project which is hoped to deliver in 2010	Section on freshwater Morphology has been updated.
dRBM PCon4 0/57	Declan Lawlor	Loughs Agency	Change title of 1st legislation (combine 2 pieces together).	Comment is noted.	Section on Marine Morphology has been updated.

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dRBM PCon4 0/58	Declan Lawlor	Loughs Agency	Marine Bill – What is the exact position? An update with current status of the marine bill is needed. There have been developments also on the NI Bill that also needs to be included, the possible role of a MMO or similar body in facilitating the delivery of WFD objectives would need to be set out if possible in this document.	Comment is noted.	Section on Marine Morphology has been updated.
dRBM PCon4 0/60	Declan Lawlor	Loughs Agency	The table doesn't spell out the enacting legislation that Ports have.	Comment is noted. NIEA will raise this with DRD Ports.	Section on Marine Morphology has been updated.
dRBM PCon4 0/61	Declan Lawlor	Loughs Agency	The Pacific Oyster is present in Lough Foyle. Bonemia to be included in Foyle.	Noted. Pacific Oyster presence in Lough Foyle has been included in the Alien Species table.	Section on Invasive Alien Species has been updated
dRBM PCon4 0/62	Declan Lawlor	Loughs Agency	The Loughs Agency has put significant effort into combating invasive species. The Loughs Agency has co-ordinated a group of statutory agencies and NGO's (Marine Institute, NIEA, NPWS, the Ulster Museum, Aquaculture Initiative) from both jurisdictions to investigate some invasive species within the FCILC area. Recently this group examined reports of the invasive Didemnum in Carlingford Lough in 2009. Following a successful survey with colleagues in NIEA and NPWS and removal of some of this from a site within the Lough it is hoped that this has been resolved. Further monitoring is planned.	Comment is noted.	Section on Invasive Alien Species has been updated.

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dRBM PCon4 0/64	Declan Lawlor	Loughs Agency	Loughs Agency legislation needs to be cited appropriately throughout. In conjunction with DCAL the Loughs Agency has been involved in developing the Management Strategy for Northern Ireland to meet the objectives of the North Atlantic Salmon Conservation Organisation (NASCO) which is an intergovernmental body established by treaty for the Atlantic salmon. The Agency is responsible in implementing this in the Foyle and Carlingford areas and reporting back to NASCO annually through DCAL. In addition the agency in conjunction with AFBI produces the annual report to the International Council for the Exploration of the Sea (ICES) on the status of stocks of salmon within the FCILC and NI areas.	Comment noted.	Section on Fisheries has been updated.
dRBM PCon4 0/65	Declan Lawlor	Loughs Agency	Coarse fish – the Loughs Agency is currently preparing regulations for coarse fish species.	Comment noted.	Section on Fisheries has been updated.
dRBM PCon4 0/66	Declan Lawlor	Loughs Agency	Regulations have been implemented in Foyle and Carlingford	Comment noted.	Section on Fisheries has been updated.



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dRBM PCon4 0/72	Declan Lawlor	Loughs Agency	The role of the Fisheries Acts needs to be included in delivery.	Comment is noted.	Section on Collection and treatment of sewage has been updated to reflect this comment.
dRBM PCon4 0/73	Declan Lawlor	Loughs Agency	The Fisheries Acts are excluded from the key legislation section.	Comment is noted.	Section on Collection and treatment of sewage has been updated to reflect this comment.

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dRBM PCon4 0/74	Declan Lawlor	Loughs Agency	Management of Misconnections – Who is responsible under law? What is the regulatory response for rectifying it? RPA may offer opportunities.	NIEA are aware of water pollution impacts associated with housing developments in certain areas in Northern Ireland where there are foul or combined sewage inputs into surface water drainage networks due to misconnections made during and/or after the construction phase of the developments or due to the presence of unknown linkages between those foul/combined and surface networks. The discharge from such Polluted Surface Water Outfalls is often referred to as 'grey' or 'sullage' water. When such mis-connections relate to a small housing development and are due to a single cause then remediation may be relatively straight forward. In relation to large housing estates where the water quality impact is due to a number of mis-connection causes, often at individual house level, then the identification of the multiple causes and the associated remediation can be extremely burdensome on resources. However, NIEA continues to work closely with the relevant stakeholders, particularly Northern Ireland Water Ltd (NIWL), in order to prioritize and rectify such problems and are currently working together with NIWL in a number of areas. NIEA are currently examining the available best practice approaches employed by other environmental regulators with a view to adopting a similar good practice document for Northern Ireland.	Supplementary measure included in RBMP.

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dRBM PCon4 0/75	Declan Lawlor	Loughs Agency	Floodplains – limited development on floodplains, river morphology and flood risk must be considered.	Rivers Agency advises Planning Service against allowing developments in floodplains and this has been the policy since 2001. River morphology and flood risk will be addressed under draft "The Water Environment (Floods Directive ) Regulations 2009" which are currently out for consultation.	Section on Abstraction and Flow regulation has been updated.
dRBM PCon5 5/32	Jim Haughey	Ulster Angling Federation	5.8.2 Housing and development on river banks - despite two full pages of questions in the SWMI Digest document, this issue receives insufficient attention in the draft RBMPs. Those who are closely concerned with looking after the rivers regard this as one of the most serious problems facing our waterways, but NIEA seem to have no interest. This needs to be a priority action area in the final RBMP.	NIEA has input to PPS reviews and liaises with Planning Service regarding Area Plans.  Rivers Agency advises Planning Service against allowing developments in floodplains and this has been the policy since 2001. River morphology and flood risk will be addressed under draft " The Water Environment (Floods Directive ) Regulations 2009 which are currently out for consultation.	Section on Freshwater Morphology has been updated.
dRBM PCon5 5/42	Jim Haughey	Ulster Angling Federation	The EU Directive says that the RBMPs should be specific to the river basin under consideration - the draft RBMPs do not meet this criterion as they are very generalised and are written to describe the situation in NI generally, and are not specific to individual river basins. E.g. 5.1.1 Referring to drinking water supply, 5.2.1 Referring to number of farm businesses, 5.3.1 Referring to wastewater collection	NIEA has subdivided the three River Basin Districts onto 26 Local Management Areas (LMAs) , which are based on sub basin catchments. Details of these areas were included as part of the supporting documentation for the consultation on the draft plans. The LMAs are being used as the level at which measures will be set and it is planned to develop action plans to implement the RBMPs in these areas. The action plans will be implemented on a three year rolling programme to allow resources to be targeted	The RBMP will include more information on the measures required to meet the objectives in each of the 26 LMAs. As part of the RBMP Implementation Programme actions plans will be developed

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					for each LMA in liaison with stakeholder groups active in those areas.
dRBM PCon5 8/13	Angela Halpeny	NIWater	<p>Section 1.5 NI Water welcomes the approach that RBMP will be subject to a strategic environmental assessment to ascertain the wider environmental impacts of the plans and programmes. NI Water would not wish to see the principle ignored or deleted due to pressure from single interest groups. Re: NI Waters Capital Works programme.</p> <p>While the costs and benefits of measures were assessed prior to their introduction, the funding will be determined by the PC10 process and it is not guaranteed that the full amount will be delivered.</p>	Comment is noted. All identified supplementary measures are subject to Strategic Environmental Assessment to assess their impact. The SEA Environmental Reports and The Habitats Directive Article 6 Assessments, for each RBD, are available from the POM pages of the website.	No change to plan. An SEA statement will be produced with the plans.

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dRBM PCon5 8/15	Angela Halpeny	NIWater	Section 5.1.4 Reduction in water supply leakage levels The Economic Level of Leakage figure is currently subject to review and will be re-assessed in conjunction with the Water Resource strategy (2010/11). The figure of 135.5 Ml/d is no longer a realistic figure and is not achievable by 2010. The reported leakage figures have been rebased for AIR09 as result of an extensive water balance review. The average water usage is approximately 150 l/hd /d based on NI Water Per Capita Consumption sites.	Comment is noted.	Section on Abstraction and Flow regulation has been updated .
dRBM PCon5 8/16	Angela Halpeny	NIWater	Section 5.3.6 g) Development Control A system of red, amber or green for water body "capacity" could increase pressure on NI Water to achieve increasingly better quality effluent. In many cases NI water will have already reached the affordable technological limit, above which costs are disproportionate to the environmental benefit. Other sectors must be targeted to achieve real improvements rather than as stated previously, NI water being seen as the single most important driver in improving water quality. The red, amber or green system for water quality, could lead to confusion given other classifications under other regimes.	It is proposed to identify the capacity of a river catchment to receive waste water discharges treated to industry best practice standards. This will be achieved through looking at catchments as a whole and identifying the impact on individual discharges. This will identify areas which cannot take any further development without the resulting waste water discharges requiring a level of treatment which would not be feasible, technically or economically. This information would inform the development of Area Plans.	Included as a supplementary measure in RBMP.

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dRBM PCon6 4/2	Lavene Bell	QPANI	QPANI feel that the most significant pressures and key sectors have been identified. Prioritising the most significant pressures in each river catchment would help to address the best course of action to improve water body status.	NIEA has subdivided the three River Basin Districts onto 26 Local Management Areas (LMAs), which are based on sub basin catchments. Details of these areas were included as part of the supporting documentation for the consultation on the draft plans. The LMAs are being used as the level at which measures will be set and it is planned to develop action plans to implement the RBMPs in these areas. The action plans will be implemented on a three year rolling programme to allow resources to be targeted.	The RBMP will include more information on the measures required to meet the objectives in each of the 26 LMAs. As part of the RBMP Implementation Programme actions plans will be developed for each LMA in liaison with stakeholder groups active in those areas.
dRBM PCon6 6/7	Andrew McDowell	National Trust	It is difficult to judge whether the targets for levels of improvement in 'Heavily Modified Water Bodies' are appropriate while there are problems around the classification of such bodies. It would be very helpful if the draft plans and the RBMP website could indicate why particular bodies have been classified in this way.	More detail on the classification of water bodies as heavily modified will be provided in the RBMP. A document on heavily modified waterbodies to be provided as a supporting document to the RBMP is being produced.	The document will be made available as part of the RBMP.

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dRBM PCon6 6/8	Andrew McDowell	National Trust	Information on the relative significance of pressures would have been very useful at a macro level – incorporated into the reports on the same basis as the ‘Gross added value by sector’ pie chart for example. This could have helped identify which sectors were responsible for more pressures and help target resources and enforcement accordingly.	NIEA has subdivided the three River Basin Districts onto 26 Local Management Areas (LMAs), which are based on sub basin catchments. Details of these areas were included as part of the supporting documentation for the consultation on the draft plans. The LMAs are being used as the level at which measures will be set and it is planned to develop action plans to implement the RBMPs in these areas. The action plans will be implemented on a three year rolling programme to allow resources to be targeted. In support of the LMAs detailed information leaflets will be produced to provide further details covering a number of the areas listed.	The RBMP will include more information on the measures required to meet the objectives in each of the 26 LMAs. As part of the RBMP Implementation Programme actions plans will be developed for each LMA in liaison with stakeholder groups active in those areas.

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dRBM PCon6 6/9	Andrew McDowell	National Trust	It would also have been very helpful to be able to see the relative significance of pressures at a local level. The same pressures are identified across all three plans, yet there is a lack of information on which pressures are more prevalent within particular geographical areas. This lack of detail is partly ameliorated by the RBMP website's interactive map, which does allow users to see which pressures are acting on particular water bodies. Unfortunately the map fails to identify the relative importance of the pressures, which will impede attempts by local groups and others to tackle the most significant issues first.	NIEA has subdivided the three River Basin Districts onto 26 Local Management Areas (LMAs), which are based on sub basin catchments. Details of these areas were included as part of the supporting documentation for the consultation on the draft plans. The LMAs are being used as the level at which measures will be set and it is planned to develop action plans to implement the RBMPs in these areas. The action plans will be implemented on a three year rolling programme to allow resources to be targeted	The RBMP will include more information on the measures required to meet the objectives in each of the 26 LMAs. As part of the RBMP Implementation Programme actions plans will be developed for each LMA in liaison with stakeholder groups active in those areas.
dRBM PCon6 8/9	Patrik Casement	CNCC	It is disappointing that not all water bodies have yet been classified. In the event of any still remaining unclassified by the issue of the Plans, information should be provided detailing the timetable for classification	All water bodies have been assessed for the RBMP and more detail on how their classification status is determined has been provided as part of the RBMP.	RBMP updated to include status of all water bodies.



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dRBM PCon6 8/37	Patrick Casement	CNCC	5.6.4 Comparison of this section across the 3 Plans shows that the information covers the whole of NI. These figures should have been broken down by RBD to demonstrate the specific problems in the catchments.	NIEA has subdivided the three River Basin Districts onto 26 Local Management Areas (LMAs) , which are based on sub basin catchments. Details of these areas were included as part of the supporting documentation for the consultation on the draft plans. The LMAs are being used as the level at which measures will be set and it is planned to develop action plans to implement the RBMPs in these areas. The action plans will be implemented on a three year rolling programme to allow resources to be targeted	The RBMP will include more information on the measures required to meet the objectives in each of the 26 LMAs. As part of the RBMP Implementation Programme actions plans will be developed for each LMA in liaison with stakeholder groups active in those areas.
dRBM PCon6 9/2	Stuart Wightman	DRD WPD	Water Policy Division is currently drafting wording in respect of Article 9 of the Directive for inclusion in the plans	This information has been included in the RBMP.	RBMP has been updated.

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dRBM PCon8 0/5	P.Mc Cruden	Rivers Agency	<p>Comments are:-</p> <p>(a) Section 5.1 Key Sectors: Water Supply, Hydropower and Flood Control Page 36 – Introduction – A definition of flood control would be helpful as it appears that this is referring to flood defence.</p> <p>(b) Page 37 – Under “What causes environmental impact” – Line 12 commencing it states “Impoundment structures associated with abstraction activities such as weirs and dams can cause environmental impact by causing barriers etc”.</p> <p>Impoundment structures often have fish passes included and are not necessarily a flood control/defence mechanism as well. Re-wording of this paragraph for clarity would be preferable.</p>	Comments are noted.	Section on Abstraction and Flow regulation has been updated.

Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
dRBM PCon8 0/6	P.Mc Cruden	Rivers Agency	<p>Page 38 – Section 54 of the Fisheries Act – “requires persons who wish to build dams and weirs or repair existing weirs in rivers to construct fish passes on the free passage of fish. All fish passes and specifications must be submitted to DCAL for approval before a pass is constructed”. Whilst we agree this is correct any person wishing to carry out work in or beside a watercourse also requires consent from Rivers Agency in accordance with Schedule 6 of the Drainage (NI) Order 1973.</p> <p>It would be worthwhile to include a statement to this effect within this section.</p>	Comments are noted.	Section on Abstraction and Flow regulation has been updated.
dRBM PCon8 0/7	P.Mc Cruden	Rivers Agency	<p>Page 41 – In the table against construction of fish passes where weirs are built or reinstated it would be of benefit to include Rivers Agency as well as DCAL and Loughs Agency under the Support Provider/Regulator column.</p>	Comments are noted.	Section on Abstraction and Flow regulation has been updated.
dRBM PCon8 0/8	P.Mc Cruden	Rivers Agency	<p>Sector 5.6 – Industry and Other Businesses – Page 68 – In the introduction it states “Industries which discharge directly to waterways are controlled by the Northern Ireland Environment Agency etc”. It would be prudent to add a few lines stating that where a quantity of water is being discharged into a waterway/watercourse consent is also required under the Drainage (NI) Order 1973 from Rivers Agency although it is accepted that this section deals with possible pollution issues.</p>	Comments are noted.	Section on Industry & other businesses has been updated.

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dRBM PCon8 0/10	P.Mc Cruden	Rivers Agency	<p>Page 82 – Some of Northern Ireland’s most productive agricultural land is located alongside rivers. However there are difficulties with farming land in the vicinity of rivers as rivers can erode into fields and floods can threaten livestock and damage crops. This has led to programmes to straighten and deepen rivers, reinforce banks and construct flood defences”.</p> <p>This statement is not fully correct as any historical programme to straighten/deepen any river would not have been solely based on these reasons. Some clarification is required along the lines, “Some straightening/deepening of rivers has been undertaken in the 1950’s and 1960’s particularly to improve the drainage of the land to facilitate growing of crops. Straightening /deepening of rivers has also not been extensive in terms of the overall length of rivers”.</p>	Comments are noted.	Section on Freshwater Morphology has been updated.

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dRBM PCon8 0/11	P.Mc Cruden	Rivers Agency	<p>Page 83 – Table 5.8(a) - Not convinced that two headings entitled “impact” is best. Under straightening and deepening of rivers impact of “increased flood risk by reducing storage of flood water within the system” is not correct. Would be better to read, “Moves flood risk by etc” as the flood risk can be moved downstream to an area which is protected from flooding.</p> <p>Under same heading not sure what statement “Reduction in resilience of system to pollution” means or is it necessarily correct related to straightening of rivers.</p> <p>Under heading of abstraction and operation of reservoirs don’t believe that statement under impact of “large variation in water levels which leads to a wide ..... Zone etc”, “is fully correct”.</p>	Comments are noted.	Section on Freshwater Morphology has been updated.
dRBM PCon8 0/12	P.Mc Cruden	Rivers Agency	<p>(i) Table 5.8(a) under Barriers to Fish migration - it would be prudent to change this to “man made barriers to fish migration” as opposed to naturally occurring barriers. The statement under impact “limits short distance migration by other fish. Creates isolated populations which are less resilient to environmental change” again is not fully correct as on some occasions isolated populations can be more resilient.</p>	Comments are noted.	Section on Freshwater Morphology has been updated.

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dRBM PCon8 0/13	P.Mc Cruden	Rivers Agency	<p>(j) Table 5.8(a) – Barriers to sediment movement - Under impact in statements “Spawning areas for .....lost” would be better as “may be lost”.</p> <p>Again under Ports and breakwaters divert sediment it would be more accurate to state “Ports and breakwaters may divert etc”. In this same sentence increased erosion does not necessarily increase flooding. This would be better re-worded.</p>	Comments are noted.	Section on Freshwater Morphology has been updated.
dRBM PCon8 0/14	P.Mc Cruden	Rivers Agency	Table 5.8(a) – Engineering structure within water environment - Not sure what the 2 statements under impact mean eg “affects the amenity value of water bodies”.Jetties built in a water body can increase the amenity value in terms of boat users, anglers, tourism etc.	Comments are noted.	Section on Freshwater Morphology has been updated.

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dRBM PCon8 0/15	P.Mc Cruden	Rivers Agency	<p>Table 5.8(a) – Loss of flood plains – feel this would be better changed to “Development in floodplains” as it is the development that results in a loss.</p> <p>The two statements under impact here are again not conclusive etc, “Increases flood risk by removing floodplain storage”. Historically where a developer has created compensatory flood storage they have on occasions successfully received planning permission. Statement needs slight re-wording.</p>	Comments are noted.	Section on Freshwater Morphology has been updated.
dRBM PCon8 0/16	P.Mc Cruden	Rivers Agency	<p>Page 84 – Under Planning there is no mention of PPS15</p> <p>In the section under “Drainage (NI) Order 1973 statements are all related to only drainage, “ have powers to carry out drainage schemes”. “Drainage schemes must now meet the requirements”, “drainage maintenance works”. It would be more appropriate to change these to “Drainage/Flood alleviation schemes” as Rivers Agency no longer carries out schemes or maintenance programmes purely for drainage purposes.</p> <p>Would also prefer statement, “Works programmes are agreed with DCAL Inland Fisheries and NIEA etc” to be reworded to “DCAL Inland Fisheries and Northern Ireland Environment Agency (NIEA) are consulted on</p>	Comments are noted.	Section on Freshwater Morphology has been updated.

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			works programmes and mitigation measures etc”.		
dRBM PCon8 0/17	P.Mc Cruden	Rivers Agency	Page 85 – First paragraph – this paragraph would need to be re-worded. Under Water (NI) Order 1999 – in statement “powers of maintenance for any waterway not designated for the purposes of the Drainage Order” it would be better to also include mention of ecology. In line 7 under Northern Ireland Atlantic Salmon Management strategy “the majority of enhancement works were “, should read “enhancement works was”.	Comments are noted.	Section on Freshwater Morphology has been updated.



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dRBM PCon8 0/18	P.Mc Cruden	Rivers Agency	Page 86 – Under Guidance and Advice - “DARD Rivers Agency etc” would prefer the following wording:- “DARD Rivers Agency Environment Section provide environmental support and advice on new flood defence schemes and maintenance works carried out by the Agency. This can involve the scoping of proposed works completion of environmental studies, consultation with conservation bodies and liaison with NIEA for all works”.	Comments are noted.	Section on Freshwater Morphology has been updated.
dRBM PCon8 0/19	P.Mc Cruden	Rivers Agency	Page 87 – Under Review of Legislation – If DOE is undertaking a review of legislative controls to control physical modifications to surface waters Rivers Agency would expect to be consulted during any review and certainly before any publication of findings.	Comments are noted.	Section on Freshwater Morphology has been updated.
dRBM PCon8 0/20	P.Mc Cruden	Rivers Agency	Page 88 – Table - Freshwater Morphology – Under Control Modifications to Surface Water would suggest under Actions that an additional sentence be put in “other Works – not under Planning Permission such as Bank Protection”. Would also add in DOE under “Control culverting activities” and add in PPS15 under Delivery Mechanism and support.	Comments are noted.	Section on Freshwater Morphology has been updated.
dRBM PCon8 0/21	P.Mc Cruden	Rivers Agency	Page 94 – Table – Marine Morphology – Add in under Actions “Sea defences” to Regulation of all harbour works and Rivers Agency as a Support Provider.	Comments are noted.	Section on Marine Morphology has been updated.

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dRBM PCon8 0/22	P.Mc Cruden	Rivers Agency	Page 104 – Under DARD Rives Agency it again only states “drainage maintenance works” would prefer this to read flood alleviation/drainage maintenance works.	Comments are noted.	Section on Fisheries has been updated.
dRBM PCon8 0/23	P.Mc Cruden	Rivers Agency	Page 106 – Under Advice, elevation and training it states “the impact of drainage maintenance works. Again would prefer flood alleviation/drainage maintenance works.	Comments are noted.	Section on Fisheries has been updated.
dRBM PCon8 0/24	P.Mc Cruden	Rivers Agency	Page 107 – Table – Under Support Provider/Regulation Rivers Agency should be included under “Protection of fisheries and habitats” and again under “Protection and restoration of Salmon habitats”. In the Delivery Mechanism and Support for Fisheries/Conservation mention should be made of Rivers Agency Service Level Agreement with DCAL Inland Fisheries and Loughs Agency.	Comments are noted.	Section on Fisheries has been updated.

Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
dRBM PCon9 0/58	Clerk to the Environment Committee & Committee for Regional Development	Committee for Regional Development and Environment Committee	The organisations representing the environmental sector were critical of the draft RBMPs. They felt they were vague in terms of commitment and had many gaps leading to concerns that much outstanding work may be done without being subject to consultation. The documents themselves were not user-friendly and they felt public discussion had been lacking. Outstanding areas of work should be completed to their full potential to enable fair and effective consultation e.g. plans for protected areas, cost effective analysis, include future climate change scenarios. They also felt strongly that RBMPs should include monitoring programmes	It is recognised that further work could be done to improve on getting input from water users. The Department sought to do this during both the preparation of the plans and throughout the consultation by engaging with stakeholders and with the public. Further work has been carried out to improve the information provided in the plans including reasons for setting alternative objectives, linking measures to the objectives and where relevant measures for protected areas under the Habitats and Birds Directives.	The RBMP will include more information on the measures required to meet the objectives in each of the 26 LMAs. As part of the RBMP Implementation Programme actions plans will be developed for each LMA in liaison with stakeholder groups active in those areas.
dRBM PCon9 3/21	CSG Meeting: Strangford and Lecale	CSG Meeting: Strangford and Lecale	3.11 - General point - Summary table cross-referenced to other POM's and not just key legislative measures. Maybe in summary, have existing and new measures.	Comment noted.	Section on Fisheries has been updated.

Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
dRBM PCon9 4/7	CSG Meeting: Belfast Lough and Lagan	CSG Meeting: Belfast Lough and Lagan	2.3 Plans don't differentiate between pressures at a River Basin District level and below – too broad	NIEA has subdivided the three River Basin Districts into 26 Local Management areas (LMAs), which are based on sub basin catchments. Details of these areas were included as part of the supporting documentation for the consultation on the draft plans. The LMAs are being used as the level at which measures will be set and it is planned to develop action plans to implement the RBMPs in these areas. The action plans will be implemented on a three year rolling programme to allow resources to be targeted.	The RBMP will include more information on the measures required to meet the objectives in each of the 26 LMAs. As part of the RBMP Implementation Programme actions plans will be developed for each LMA in liaison with stakeholder groups active in those areas.

### 5.3 Working together

Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
dRBMPC on21/7	Helena Rafferty	Newcastle Sustainable Community Planning Forum	Joined up thinking in NI? You really are aiming high!	As the body responsible for implementing the Water Framework Directive, the Department of the Environment has set up the Water Framework Directive Implementation Working Group (IWG). This is made up of representatives from the departments/agencies that are responsible for implementation of the plans, including Regional Development, Culture, Arts & Leisure, Agriculture, and Rural Development, River's Agency, Planning Service, Lough's Agency and Forest Service. The minutes of previous meetings of the IWG can be accessed at <a href="http://www.ni-environment.gov.uk/water-home/roles/coordinating_production_of_draft_rbmps_with_partners.htm">http://www.ni-environment.gov.uk/water-home/roles/coordinating_production_of_draft_rbmps_with_partners.htm</a>	The supporting document on Competent Authorities has been updated.
dRBMPC on18/7	George Butler	NI Water	None – The WFD process has been useful. Always helpful to have planners input.	As the body responsible for implementing the Water Framework Directive, the Department of the Environment has set up the Water Framework Directive Implementation Working Group (IWG). This is made up of representatives from the departments/agencies that are responsible for implementation of the plans, including Regional Development, Culture, Arts & Leisure, Agriculture, and Rural Development, River's Agency, Planning Service, Lough's Agency and Forest Service. The minutes of previous meetings of the IWG can be	The supporting document on Competent Authorities has been updated.

Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	
				How the comments have been addressed in the RBMP	
				accessed at <a href="http://www.ni-environment.gov.uk/water-home/roles/coordinating_production_of_draft_rbmps_with_partners.htm">http://www.ni-environment.gov.uk/water-home/roles/coordinating_production_of_draft_rbmps_with_partners.htm</a>	
dRBMPC on10/13	Dr Bob Common	Public	There appears to be a lack of coordination in the efforts of official departments with shared involvements in environmental changes, either through development and/or conservation measures.	The WFD Inter-departmental Board has the role of strategic co-ordination of all work required by departments and agencies towards full implementation, integration and commonality of purpose. The Board takes the strategic overview in aiding Departmental management decisions on resources, responsibilities and activities. It will ensure that all relevant policies and programmes are consistent with WFD objectives. As the body responsible for implementing the Water Framework Directive, the Department of the Environment has set up the Water Framework Directive Implementation Working Group (IWG). This is made up of representatives from the departments/agencies that are responsible for implementation of the plans, including Regional Development, Culture, Arts & Leisure, Agriculture, and Rural Development, River's Agency, Planning Service, Lough's Agency and Forest Service. The minutes of previous meetings of the IWG can be accessed at <a href="http://www.ni-environment.gov.uk/water-home/roles/coordinating_production_of_draft_rbmps_with_partners.htm">http://www.ni-environment.gov.uk/water-home/roles/coordinating_production_of_draft_rbmps_with_partners.htm</a>	The supporting document on Competent Authorities has been updated.

Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
dRBMPCon11/12	Keady District Angling Club	Keady District Angling Club	Small local lakes need to be protected as well but how is this done? More involvement of the authorities with local anglers can ensure that the local waters are seen as vital in the future developments.	DCAL will endeavour to respond to actionable intelligence regarding breaches of fisheries law on all waterbodies irrespective of size. Anglers are encouraged to report this to local staff and build relationships to ostracise those involved. Clubs are further encouraged to appoint their own Private Water Bailiffs under the Fisheries Act through DCAL.	Section on Fisheries has been updated.
dRBMPCon21/5	Helena Rafferty	Newcastle Sustainable Community Planning Forum	Local input from local 'watchers' is critical in communication, not just by telephone but also by email, interactive website, designated communication officer.	NIEA has subdivided the three River Basin Districts onto 26 Local Management Areas (LMAs), which are based on sub basin catchments. Details of these areas were included as part of the supporting documentation for the consultation on the draft plans. The LMAs are being used as the level at which measures will be set and it is planned to develop action plans to implement the RBMPs in these areas. The action plans will be implemented on a three year rolling programme to allow resources to be targeted. NIEA will be reviewing its communication strategy as part of the Implementation Programme for the LMA action plans.	The RBMP will include more information on the measures required to meet the objectives in each of the 26 LMAs. As part of the RBMP Implementation Programme actions plans will be developed for each LMA in liaison with stakeholder groups active in those areas
dRBMPCon23/10	Clare	Freshwater	Greater cooperation with relevant organisations in Republic of Ireland is required in order to	There is currently good cooperation on a North South basis on technical issues including the	An updated Tier 1

Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
	Cock erill	Task Force	ensure coordinated management of International RBDs. Consideration of how programmes of measures will be implemented consistently in International RBDs should have been included in the draft Plans.	monitoring of shared water bodies. This is coordinated through the North South Technical Advisory Group, which includes representatives of NIEA, EPA, AFBI and Fishery Boards. The objectives for the shared water bodies within the North Western and Neagh Bann International Basin Districts (IRBDs) have been agreed on a North South basis and were published as part of the Tier 1 documents for each IRBD. The same approach has been followed for the RBMPs to be published in December 2009.	document will be published for each IRBD. In addition a North South Implementation Group comprising NIEA, Donegal County Council and Monaghan County will be established to support the implementation of measures in the shared water bodies. The Group will initially meet on a quarterly basis, with the start up meeting planned for Spring 2010.



Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
dRBMPC on23/54	Claire Cockerill	Freshwater Task Force	While NIEA is responsible for coordinating the river basin planning process, other departments must share the responsibility for the delivery of the RBMPs. Without full cross departmental support including active engagement and commitment from other government departments such as DCAL, DARD and DRD, the Plans cannot achieve the desired aim of sustainable water use and the delivery of enhanced protection and improvement of the water environment.	The WFD Inter-departmental Board has the role of strategic co-ordination of all work required by departments and agencies towards full implementation, integration and commonality of purpose. The Board takes the strategic overview in aiding Departmental management decisions on resources, responsibilities and activities. It will ensure that all relevant policies and programmes are consistent with WFD objectives. As the body responsible for implementing the Water Framework Directive, the Department of the Environment has set up the Water Framework Directive Implementation Working Group (IWG). This is made up of representatives from the departments/agencies that are responsible for implementation of the plans, including Regional Development, Culture, Arts & Leisure, Agriculture, and Rural Development, River's Agency, Planning Service, Lough's Agency and Forest Service. The minutes of previous meetings of the IWG can be accessed at <a href="http://www.ni-environment.gov.uk/water-home/roles/coordinating_production_of_draft_rbmps_with_partners.htm">http://www.ni-environment.gov.uk/water-home/roles/coordinating_production_of_draft_rbmps_with_partners.htm</a>	The supporting document on Competent Authorities has been updated.
dRBMPC on23/55	Claire Cockerill	Freshwater Task Force	The Taskforce has concerns about the lack of coordination with ROI counterparts and the failure to produce a single plan for International River Basin Districts. We suggest this is a matter that would be appropriately addressed by the North-South Ministerial Council. More	There is currently good cooperation on a North South basis on technical issues including the monitoring of shared water bodies. This is coordinated through the North South Technical Advisory Group, which includes representatives of NIEA, EPA, AFBI and Fishery Boards. The	An updated Tier 1 document will be published for each IRBD. In addition a

Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
			information is required about how the objectives will be achieved within International River Basin Districts with cross referencing of Plans for a more complete picture of the status of IRBDs and how they will be managed.	objectives for the shared water bodies within the North Western and Neagh Bann International Basin Districts (IRBDs) have been agreed on a North South basis and were published as part of the Tier 1 documents for each IRBD. The same approach has been followed for the RBMPs to be published in December 2009.	North South Implementation Group comprising NIEA, Donegal County Council and Monaghan County will be established to support the implementation of measures in the shared water bodies. The Group will initially meet on a quarterly basis, with the start up meeting planned for Spring 2010.
dRBMPCon23/56	Claire Cockrill	Freshwater Task Force	The plans should describe how they have been integrated with NI Water Resource Plans and other relevant strategies such as development plans. A greater focus is also required on transitional and coastal waters and clear strategy linking with Marine Strategy Framework Directive.	DRD Water Policy Division are investigating the benefits of a planning policy statement for water and sewerage services. This policy would help clarify the roles and responsibilities of those involved in delivering services. The policy could also take account of key strategies such as the Regional Development Strategy NI Sustainable Development Strategy and also area plans. NIW	'Register of Plans and Programmes' has been updated.

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				<p>has begun producing its Water Resource Management Plans and should have draft output ready hopefully by May 2010. NIW intends to work closely with DRD Water Policy Division, NIEA, NIAUR and other key stakeholders to ensure the Water Resource Management Plans integrate with relevant policies and strategies in NI. NI Water Operations team has produced a drought management plan for internal NIW use. A more formal drought management plan will be produced on completion of the Water Resource Management Plan. In addition NIW has a current water resource strategy 2002 - 2030 which has generated and continues to generate capital expenditure in relation to water resources. The strategy is however long term and is subject to review on a regular basis. At present NIW is in the process of reviewing and updating the strategy using current methodologies for water resource planning which have been developed since the 2002 - 2030 strategy was produced. The strategy will also be referred to as a water resource management plan which is in line with the current process in GB.. In addition a more detailed link will be identified between the RBMPs and other plans and programmes included in the RBMPs. The reader is directed to the 'Register of Plans and Programmes', a supporting web based document, for further information.</p>	

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dRBMPC on23/164	Claire Cockerill	Freshwater Task Force	<ul style="list-style-type: none"> <li>5.9.5 The Taskforce believe that a more structured approach to inter-departmental coordination on Marine issues is required. How will the Marine Bill timescale (expected by 2011) help to achieve WFD targets. Furthermore, how will the role of the Marine Management Organisation (MMO) whether UK or if NI has one fit in here? It appears likely that all wave and tidal energy planning will be managed by them.</li> </ul>	<p>The Department's Planning and Environmental Policy Group has already established an Interdepartmental Marine Steering Group, which is actively examining the issues arising under the new Marine Legislation - Marine Strategy Framework Directive, UK and Northern Ireland Marine Bills. The provisions of both the UK and NI Bills covering the Marine Policy Statement, Marine Spatial Planning (and licensing decisions taken in accordance with these) as well as marine nature conservation will help to contribute to the achievement of WFD targets. No decision has yet been taken on the delivery mechanism for the Marine Bill in Northern Ireland. However, whichever delivery mechanism is agreed, Marine Spatial Planning, including planning for wave and tidal energy applications will be within its remit. DETI is currently completing a Strategic Environmental Assessment for Marine Renewables in Northern Ireland.</p>	<p>In light of the timescales, the RBMP can only refer to the current developments in marine legislation.</p>
dRBMPC on35/12	Jim Bradley	Belfast Hills Partnership	<ol style="list-style-type: none"> <li>In broad terms, yes, although how the levels of improvement translate locally is difficult to unravel. Coming from a more urban locality, we are anxious at the length of time specified e.g. for groundwater and heavily modified waterbodies improvement.</li> <li>The pressures of development and also planning policies has been omitted. Sewage treatment remains a major pressure on water bodies.</li> </ol>	<p>NIEA has subdivided the three River Basin Districts onto 26 Local Management Areas (LMAs), which are based on sub basin catchments. Details of these areas were included as part of the supporting documentation for the consultation on the draft RBMPs. The LMAs are being used as the level at which measures will be set and it is planned to develop action plans to implement the RBMPs in these areas. The action plans will be implemented on a three year rolling</p>	<p>The RBMP will include more information on the measures required to meet the objectives in each of the 26 LMAs. As part of the RBMP</p>

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			<p>3. We have not identified any more.</p> <p>4. There are a number of small or growing local projects which we are aware of not yet registered under Projects Aiming to Increase aquatic Resources (PAIRS) scheme. We will encourage registration.</p> <p>5. This assumes a high level of knowledge of all other relevant plans and programmes. It would be more helpful to outline those seen by the department as relevant so that consultees could comment on omissions and possible linkages.</p> <p>6. We applaud the work being done in terms of information provision, networking and consultation to date. There are however a range of possible partners willing to be actively involved in areas such as pollution incident water sampling and evidence gathering, surveying such as invertebrate and invasive species surveying and discharge source mapping. Concerns about evidence gathering by individuals should specifically be openly discussed so that at least the opinions of all sides are understood and appreciated if not agreed with. This issue should not then get in the way of other potential partnership work areas. With the possible exception of information gathered for legal cases, such efforts could be co-ordinated in the near future to enhance the work of government departments.</p>	<p>programme to allow resources to be targeted. 2.It is accepted that "Planning and Development" are additional pressures on the aquatic environment. The Department is considering what further mechanisms are required to ensure the River Basin Management Plans are integrated into the overall planning process including the Strategic Development Strategy and Development Area Plans.3. Comment is noted. 4. Noted. NIEA will follow up on this. 5. A more detailed link will be identified in the RBMP demonstrating how the River Basin Planning process is committed to working together with other organisations. Section on 'Working Together' will be revised for the RBMP. The reader is directed to the 'Record of Consultation and Engagement', a supporting web based document, for further information.</p> <p>6. It is accepted that implementation of the RBMPs will require collaboration with a wide range of stakeholders. Please refer to 1. above. Agreement has been reached between NIEA and Ulster Anglers Federation to run a pilot exercise to train nominated water bailiffs in the collection of water samples as part of the investigation of pollutions incidents.</p>	<p>Implementation Programme actions plans will be developed for each LMA in liaison with stakeholder groups active in those areas</p>

Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
			<p>These partners, which include angling clubs, private water bailiffs and local conservation groups and individuals, represent a potentially key element to engaging with local communities. Their engagement calls for some innovative pilot projects to assess their potential, agree possible roles, provide training and in particular some level of project funding. We would urge the department to address this potential positively and to work with those who commit a lot of time and effort into these consultations to identify what would work best in terms of practical partnership. We would also specifically suggest the Belfast Hills area as being an excellent potential pilot area for such partnership work and would be happy to discuss this with the relevant government departments.</p>		
dRBMPC on58/9	Angela Halpeny	NIWater	<p>NI Water has developed a number of Drinking Water Safety Plans, which will help safeguard the drinking water supplies and are working with a number of other departments and agencies.</p>	<p>NI Water employ the Drinking Water Safety Plan (DWSP) approach to the management of drinking water supplies for Northern Ireland. This approach assesses all of the risks posed to drinking water quality and supply and considers mitigating action to minimise those risks. The DWSP approach considers catchment, treatment, distribution and customer tap issues. We have assessed the risks for our primary drinking water catchment areas and are in the process of completing this exercise for the remaining catchments. We work together with Northern Ireland Environment Agency (NIEA) to protect our catchments and to assist in the</p>	<p>Section on Abstraction and flow regulation has been updated.</p>

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				<p>Water Framework Directive Programme of Measures. Through NIEA we have access to NGOs, Forestry Service and the NI Agricultural Community. It is important for each catchment to have appropriate risk minimisation methods according to the risks which have been identified for that catchment. E.G. NIEA and NI Water work together on promoting safe use of pesticides by the agricultural community, and jointly investigate any instances of inappropriate use. NI Water is considering a wide range of measures to improve drinking water catchment areas and therefore the quality of raw water.</p>	
dRBMPCon63/6	John Kelpie	Derry City Council	<p>It is suggested that this plan is fully linked to the Derry/Londonderry BAP through representation on the Derry and District Partnership and associated working Groups. Any opportunities for collaborative work can be identified via this partnership approach.</p>	<p>Comment noted. The reader is directed to the 'Register of Plans and Programmes', a supporting web based document, for further information.</p>	<p>A more detailed link will be identified between the RBMPs and other plans and programmes included in the RBMPs. Section detailing 'Register of Plans and Programmes' will be revised for the RBMP. The reader is</p>

Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
					directed to the 'Register of Plans and Programmes', a supporting web based document, for further information.
dRBMPCon65/18	Clair e Cockerill	WWF NI	In addition, WWF-NI has concerns about the lack of coordination with ROI counterparts and the failure to produce a single plan for International River Basin Districts. We suggest this is a matter that would be appropriately addressed by the North-South Ministerial Council.	There is currently good cooperation on a North South basis on technical issues including the monitoring of shared water bodies. This is coordinated through the North South Technical Advisory Group, which includes representatives of NIEA, EPA, AFBI and Fishery Boards. The objectives for the shared water bodies within the North Western and Neagh Bann International Basin Districts (IRBDs) have been agreed on a North South basis and were published as part of the Tier 1 documents for each IRBD. The same approach has been followed for the RBMPs to be published in December 2009.	An updated Tier 1 document will be published for each IRBD. In addition a North South Implementation Group comprising NIEA, Donegal County Council and Monaghan County will be established to support the implementation of measures in the shared water bodies. The Group will



Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
					initially meet on a quarterly basis, with the start up meeting planned for Spring 2010.
dRBMPCon65/22	Claire Cockerill	WWF NI	<p>1. Strong Leadership and a visible River Champion are needed to raise the profile of and encourage public interest in improving water quality in local water bodies in line with Water Framework Directive targets.</p> <p>2. Efficiency through maximising utilisation of all available resources, including the engagement of local resources found in established interest groups, is required to assist with overcoming economic challenges.</p> <p>3. Plans which clearly map action to achieving objectives is necessary to realise targets and ensure transparency. A robust framework which sets out responsibilities and coordinates the roles of all stakeholders is also essential.</p> <p>4. Simple language and communication of short, sharp messages to highlight key impacts of water quality problems should be used to assist wider understanding and transparency of need to address water quality issues.</p> <p>5. River Basin Management Plans need to be presented at a local catchment level to secure engagement from the wider public and allow</p>	<p>Comments are noted.</p> <p>NIEA actively seeks to engage with all stakeholders interested in the water environment through nine Catchment Stakeholder Groups (CSG) which meet biannually. The CSG meetings enable stakeholders to engage with the statutory authorities in order to influence decisions on how the Water Framework Directive is implemented in Northern Ireland. The group share local knowledge and expertise so as to address and resolve local water management issues. More information is available at <a href="http://www.ni-environment.gov.uk/water-home/wfd/public_partic_3/catchment_stakeholder_groups.htm">http://www.ni-environment.gov.uk/water-home/wfd/public_partic_3/catchment_stakeholder_groups.htm</a></p> <p>NIEA has subdivided the three River Basin Districts onto 26 Local Management Areas (LMAs), which are based on sub basin catchments. Details of these areas were included as part of the supporting documentation for the consultation on the draft RBMPs. The LMAs are</p>	<p>As part of the RBMP Implementation Programme actions plans will be developed for each LMA in liaison with stakeholder groups active in those areas.</p> <p>A new supplementary measure on the establishment of River Trusts has been included in the RBMPs.</p>

Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
			<p>stakeholders take ownership of local river management.</p> <p>6. A pilot scheme should be developed to demonstrate how local groups such as angling clubs can be trained to collect information to inform management of local water bodies that will supplement government data and act as an additional on-the-ground resource.</p> <p>7. Adopt an engagement strategy that involves going out to groups who already have an interest and can be engaged through a relevant incentive such as financial, environmental or social interest. Engaging must be easy and not too demanding on time, for example.</p> <p>8. Encourage communities to create 'Visions' for their local rivers to help them better understand the way they want their rivers to be and how they can contribute to help achieve this.</p> <p>9. Appoint local coordinators who understand the local context to facilitate communities in realising their goals and to assist in linking grass roots action with top level management of the water environment.</p> <p>10. Regularly obtaining two-way feedback which acknowledges and rewards community achievement and allows the community to continue to shape the future plans will help to sustain public participation in the management of local their rivers.</p>	<p>being used as the level at which measures will be set and it is planned to develop action plans to implement the RBMPs in these areas. The action plans will be implemented on a three year rolling programme to allow resources to be targeted.</p>	

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dRBMPC on66/3	Andrew McDowell	National Trust	Keen to play part in delivering new measures, but need greater clarity from the plans in order to be able to 'link up' and take part. The plans and information on the Department's website must be enhanced to be made more understandable –both for NGOs and the general public.	Comment is noted. The format and layout of the summary RBMPs and website have been updated to improve access.	Carried forward for edits in the RBMP.  'Register of Plans and Programmes' has been updated.
dRBMPC on68/21	Patrick Case ment	CNCC	The announcement at a recent NI WFD Stakeholder meeting that NIEA is investigating working with river trusts in GB is most welcome and to be encouraged. These bodies have a wealth of knowledge they can bring to the issue of river restoration and are experienced in involving stakeholders.	The facilitation of the establishment of River Trusts in Northern Ireland has been included as one of the new supplementary measures set out in the RBMPs. The proposal is to facilitate local groups who wish to establish a River Trust in their area.	A new supplementary measure on the establishment of River Trusts has been included in the RBMPs
dRBMPC on72/5	Aileen Lawson	UFU	The Ulster Farmers' Union is willing to participate at all levels in the development and delivery of River Basin Management Plans as long as all sectors work together in a positive manner to move towards the objectives set for each of the water bodies. It is important that stakeholders recognise the constraints of others particularly in these difficult economic conditions and the limited budgets that are available to deliver the objectives.	NIEA has subdivided the three River Basin Districts into 26 Local Management Areas (LMAs) which are based on sub basin catchments. Details of these areas were included as part of the supporting documentation for the consultation on the draft RBMPs. The LMAs are being used as the level at which measures will be set and it is planned to develop action plans to implement the RBMPs in these areas. The action plans will be implemented on a three year rolling programme to allow resources to be targeted.	As part of the RBMP Implementation Programme actions plans will be developed for each LMA in liaison with stakeholder groups active in those areas.

Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
dRBMPC on81/10	John Anderson	FoLL	Establishment of small trust status bodies for formal co-operation with NIEA in the management of Larne Lough (and Dundrum Bay).	The facilitation of the establishment of River Trusts in Northern Ireland has been included as one of the new supplementary measures set out in the RBMPs. The proposal is to facilitate local groups who wish to establish a River Trust in their area.	The establishment of River Trusts in Northern Ireland has been included as one of the new supplementary measures set out in the RBMPs
dRBMPC on81/12	John Anderson	FoLL	There is no evidence of how Local Council responsibilities in relation to RBDs are to be apportioned, regulated or funded. This key role should have been clearly defined years ago but, even given the imminent RPA restructuring, appears to be no further forward.	Preparation is well underway for Local Government Reform and implementation structures have been established to work on different aspects of the programme. Some responsibilities which that will be transferring to the councils' include: <ul style="list-style-type: none"> <li>• The transfer of responsibility for the maintenance and development of local roads and associated traffic management.</li> <li>• Functions of the NI Fishery Harbour Authority - Responsibility for the fishing ports of Kilkeel, Ardglass and Portavogie. This includes the management, maintenance and improvement of the harbour and harbour estates, including the operation of facilities and the maintenance of entrances and channels to the harbours</li> <li>• Operational delivery of urban regeneration programmes, including Neighbourhood</li> </ul>	'Register of Plans and Programmes' has been updated.

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				<p>Renewal and physical development (including environment improvement schemes)</p> <ul style="list-style-type: none"> <li>• Development Control (excluding planning applications for major developments, and applications relating to landfill, minerals, larger WWTW's and major infrastructure).</li> <li>• Transfer of a number of identified water recreation assets/sites with public facilities such as canoe, steps, riverside paths, car parks etc.</li> </ul> <p>(<a href="http://www.doeni.gov.uk/index/local_government/local-government-legislation-2/reform_programme_legislation-2.htm">http://www.doeni.gov.uk/index/local_government/local-government-legislation-2/reform_programme_legislation-2.htm</a>)</p>	
dRBMPCon85/2	Sean Convery	FWAG NI	Our main general concern regarding the RBMPs is the need for greater and wider public, private sector and commercial sector involvement. We are of the opinion that the documents fail to engage with most people and that many of the targets within are not specific enough and fall short of having real aspiration.	A Water Framework Directive Stakeholder Forum is in place, which includes representatives across a wide range government and non-government organisations. In addition NIEA has established 9 Catchment Stakeholder Groups across NI, with the aim of facilitating participation by local stakeholders in the development and implementation of the RBMPs. DoE is currently reviewing the current working arrangements of the groups with a view to strengthening the linkages. NIEA has subdivided the three River Basin Districts onto 26 Local Management Areas (LMAs), which are based on sub basin catchments. Details of these areas were included as part of the supporting documentation for the consultation on the draft RBMPs. The LMAs are being used as the level at which measures will be	The RBMP will include more information on the measures required to meet the objectives in each of the 26 LMAs. As part of the RBMP Implementation Programme actions plans will be developed for each LMA in liaison with

Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
				set and it is planned to develop action plans to implement the RBMPs in these areas. The action plans will be implemented on a three year rolling programme to allow resources to be targeted.	stakeholder groups active in those areas
dRBMPCon90/24	Clerk to the Environment Committee & Committee for Regional Development	Committee for Regional Development and Environment Committee	The organisations with a commercial or business interest were of the view that a framework existed to address the issues however this could be improved through more proactive enforcement. Other suggestions included the application of a standard for septic tanks, and the potential advantages of a unified body to manage river systems, and that the co-ordination of those bodies who manage rivers might be undertaken by the NIEA.	Where water pollution occurs it is the policy of NIEA, to take formal enforcement action, if this is warranted by the severity of the pollution and the circumstances which led to it occurring. NIEA Water Management Unit policy is that enforcement action will be initiated where there is a High or Medium Severity impact associated with a water pollution incident, the polluter has been identified and there are no mitigating factors that would preclude such action. In deciding what, if any, enforcement action to take in each case, NIEA aims to ensure that enforcement action is: <ul style="list-style-type: none"> <li>• Consistent with the enforcement action taken in other cases;</li> <li>• Proportionate to the risks the incident has posed to the environment and the seriousness of the breach of the law; and</li> <li>• Transparent, in that those being regulated know what is expected of them and the public have confidence in the enforcement process.</li> </ul> The formal enforcement options available to NIEA in water pollution cases are:	A new supplementary measure has been included in the RBMPs.

Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
				<ul style="list-style-type: none"> <li>• the issuing of an enforcement Warning Letter, and/or;</li> <li>• the issuing of a Water (NI) Order 1999 Notice, or</li> <li>• the instigation of prosecution proceedings through PPS.</li> </ul> <p>NIEA issued a Revised Enforcement and Prosecution Policy 2009 document for consultation earlier this year. Comments were invited from interested parties by 22 June 2009. The draft is available at <a href="http://www.ni-environment.gov.uk/consultation_paper_draft_revised_enforcement_policy_mar_2009.pdf">http://www.ni-environment.gov.uk/consultation_paper_draft_revised_enforcement_policy_mar_2009.pdf</a></p> <p>In respect of the request for “more proactive enforcement”, the agency is responsible for taking action to prevent water pollution through provision of advice/education and/or enforcement of existing regulations to both prevent water pollution from occurring and to minimise the effects of polluting discharges should they occur. Proactive Pollution Prevention activities, carried out by the agency, include:</p> <ul style="list-style-type: none"> <li>• Site visits to assess the risk of a polluting discharge impacting the water environment and the provision of advice on how to mitigate the risk factors involved, thereby, lowering those risks.</li> <li>• Issuing Warning Letters, Pre-Notices and Notices, under the Water (NI) Order 1999, to enforce work to be carried out at premises in</li> </ul>	

Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
				<p>order to minimise the risk of a polluting discharge to the water environment.</p> <ul style="list-style-type: none"> <li>• Responding to Planning Applications and Strategic Environmental Assessments (SEA), as consultee, on projects and plans/policies likely to impact on the water environment.</li> <li>• Following up high severity pollution incidents with a proactive site specific plan to remediate identified difficulties and risks.</li> <li>• Completing pollution prevention surveys on industrial areas such as Industrial Estates.</li> </ul> <p>For advice on specific pollution prevention issues please or to arrange a site visit please contact us at Pollution Prevention Team, Water Management Unit 17 Antrim Road Lisburn County Antrim Northern Ireland BT28 3AL, or e-mail <a href="mailto:pollutionprevention@doeni.gov.uk">pollutionprevention@doeni.gov.uk</a>.</p>	
dRBMPC on90/25	Clerk to the Environment Committee & Committee for Regional	Committee for Regional Development and Environment Committee	For the organisation with an interest in the leisure and tourism sector, linkages with other relevant plans and programmes could be improved by Departments adopting a more holistic approach, and by seeking more input and involvement from stakeholders.	NIEA has subdivided the three River Basin Districts onto 26 Local Management Areas (LMAs) , which are based on sub basin catchments. Details of these areas were included as part of the supporting documentation for the consultation on the draft RBMPs. The LMAs are being used as the level at which measures will be set and it is planned to develop action plans to implement the RBMPs in these areas. The action plans will be implemented on a three year rolling programme to allow resources to be targeted.	As part of the RBMP Implementation Programme actions plans will be developed for each LMA in liaison with stakeholder groups active in those areas.



Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
	Development				
dRBMPCon90/49	Clerk to the Environment Committee & Committee for Regional Development	Committee for Regional Development and Environment Committee	The organisations with environmental interests recognised that had no implementation role but were concerned about the lack of co-ordination across departments and the risk of this resulting in poor implementation of existing water regulations, lack of enforcement, poor planning decisions and no catchment awareness. They were also concerned about the lack of information on how the plans would be implemented, inadequate resources and urged for incentives to encourage efficient use.	NIEA has subdivided the three River Basin Districts onto 26 Local Management Areas (LMAs), which are based on sub basin catchments. Details of these areas were included as part of the supporting documentation for the consultation on the draft RBMPs. The LMAs are being used as the level at which measures will be set and it is planned to develop action plans to implement the RBMPs in these areas. The action plans will be implemented on a three year rolling programme to allow resources to be targeted. The WFD Inter-departmental Board has the role of strategic co-ordination of all work required by departments and agencies towards full implementation, integration and commonality of purpose. The Board takes the strategic overview in aiding Departmental management decisions on resources, responsibilities and activities. It will ensure that all relevant policies and programmes are consistent with WFD objectives. In support the Water Framework Directive Implementation Working Group (IWG) has been set up. This is made up of representatives from the departments/agencies that are responsible for water.	As part of the RBMP Implementation Programme actions plans will be developed for each LMA in liaison with stakeholder groups active in those areas.

Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
dRBMPC on90/54	Clerk to the Environment Committee & Committee for Regional Development	Committee for Regional Development and Environment Committee	The farming sector, having stressed the advantages for taking a voluntary approach to implementation of the RBMPs, called for assistance with this.	Comment is noted.	As part of the RBMP Implementation Programme actions plans will be developed for each LMA in liaison with stakeholder groups active in those areas.
dRBMPC on90/57	Clerk to the Environment Committee & Committee for Regional Development	Committee for Regional Development and Environment Committee	The organisations representing the water industry indicate they are content to work through the consultation process but would like to reserve the right to seek bi-laterals with government departments as and when required. They would also welcome support and assistance in disseminating a realistic approach to delivery of their capital work programme.	NIEA has worked closely with Northern Ireland Water and the Department for Regional Development in determining the environmental priorities for investment during the period 2010-2013 and beyond. NIEA will continue to liaise with NIW during the implementation phase and assist with dissemination of the programme through Catchment Stakeholder Groups.	As part of the RBMP Implementation Programme actions plans will be developed for each LMA in liaison with stakeholder groups active in those areas.

Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
dRBMPCon93/25	CSG Meeting: Strangford and Lecale	CSG Meeting: Strangford and Lecale	New ways of working – setting up small groups to tackle better ways of working together.	Comment is noted. During the implementation phase of this plan NIEA will actively encourage additional measures that are specific to individual water bodies through engaging with local communities in local water body management projects. Local communities can register their projects with NIEA through the Projects Aiming to Improve Aquatic Resources (PAIRS) details of which can be found in the POM webpage. A new supplementary measure on the facilitation of the establishment of River Trusts has been included in the RBMPs.	A new supplementary measure on establishment of River Trusts has been included in the RBMPs.
dRBMPCon94/11	CSG Meeting: Belfast Lough and Lagan	CSG Meeting: Belfast Lough and Lagan	<p>Develop partnerships with private water bailiffs – collect water sample, invertebrate sampling</p> <ul style="list-style-type: none"> <li>- Linkages and partnerships with ENGO's</li> <li>- Using angling club individuals for monitoring - large numbers of people on ground. Clubs can drive it.</li> </ul> <p>Local knowledge – breaking down barriers e.g. bug cards 'good bugs, bad bugs' WWF Ripple – reporting tool on web.</p> <ul style="list-style-type: none"> <li>- Electro fishing stocks information, tying together databases, government departments need to improve data links and not replicate.</li> <li>- Using other organisations information and independent information e.g. angling data from pollution incident.</li> <li>- Civil cases taken – background information</li> </ul>	<p>Comments are noted.</p> <p>NIEA is currently engaging with the Ulster Angling Federation and other related stakeholders to examine and progress this issue. If adopted, the approach is likely to undergo initial trialing in a limited number of areas. However, regardless of outcome, anglers and related stakeholders may continue to provide Statements of Witness in relation to water pollution enforcement cases where this is appropriate.</p>	Section on Fisheries has been updated.

Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
			<p>used in these cases – consequential losses.</p> <ul style="list-style-type: none"> <li>- Partnership working e.g. NIEA and agriculture.</li> <li>- Partnership working with NIW with respect to pollution problems</li> <li>- River bailiffs trained to take samples when pollution incidents occur, angling club.</li> <li>- Tie in with training from NIEA Staff of local interested parties e.g. invertebrates.</li> <li>- Use public to fulfill Government needs</li> </ul>		
dRBMPCon95/13	CSG Meeting: Bush and Glens	CSG Meeting: Bush and Glens	<p>Would be advantageous to arrange visits by people in local areas to see what a good quality river is like in comparison to a bad quality river.</p> <ul style="list-style-type: none"> <li>-CSG days out with wider public involvement.</li> <li>-Establish river trusts.</li> <li>-The recent suggestion by the UK government of what is call the new green deal, raises the possibility of / facilitates getting people into work. Potential employment opportunities and training on river work.</li> </ul>	<p>The facilitation of the establishment of River Trusts in Northern Ireland has been included as one of the new supplementary measures set out in the RBMPs. The proposal is to facilitate local groups who wish to establish a River Trust in their area.</p>	<p>A new supplementary measure on the establishment of River Trusts has been included in the RBMPs</p>
dRBMPCon97/10	CSG Meeting: Lower Neagh Bann	CSG Meeting: Lower Neagh Bann	<p>More support is needed for the promotion of the River Trust model.</p> <ul style="list-style-type: none"> <li>- New Green deal – environmentally related jobs.</li> <li>- Adult and community education and environmental employment.</li> <li>- Rural Community Network facilitation with local environmental groups.</li> </ul>	<p>The facilitation of the establishment of River Trusts in Northern Ireland has been included as one of the new supplementary measures set out in the RBMPs. The proposal is to facilitate local groups who wish to establish a River Trust in their area.</p>	<p>A new supplementary measure on the establishment of River Trusts has been included in the RBMPs</p>

Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
dRBMPC on98/10	CSG Meeting: Carlingford and Mourne	CSG Meeting: Carlingford and Mourne	River trust being promoted through NIEA e.g. RIPPLE – Ballinderry. -Action contact CO -Would make consultation much easier.	Points noted. This summary has been covered in detailed comments.	Any changes required have been listed against relevant comments.
dRBMPC on99/7	CSG Meeting: Lower Foyle	CSG Meeting: Lower Foyle	Mechanism to deal with cross departmental issues. - Development of River trusts	The facilitation of the establishment of River Trusts in Northern Ireland has been included as one of the new supplementary measures set out in the RBMPs. The proposal is to facilitate local groups who wish to establish a River Trust in their area.	A new supplementary measure on the establishment of River Trusts has been included in the RBMPs
dRBMPC on100/8	CSG Meeting: Upper Foyle	CSG Meeting: Upper Foyle	Funding priorities and level of funding. - Litter removal should be included - The development of River trusts? Good way forward.	The facilitation of the establishment of River Trusts in Northern Ireland has been included as one of the new supplementary measures set out in the RBMPs. The proposal is to facilitate local groups who wish to establish a River Trust in their area.	A new supplementary measure on the establishment of River Trusts has been included in the RBMPs

Consultation comment ID	Name	Organisation	Comments	Consultation Document Response	How the comments have been addressed in the RBMP
dRBMPC on101/6	CSG Meeting: Erne and Melvin	CSG Meeting: Erne and Melvin	<p>River Trusts? These provide more ownership of rivers. Funding opportunities.</p> <p>There are lots of clubs and expertise out there. There is a high level of local support in Fermanagh.</p>	The facilitation of the establishment of River Trusts in Northern Ireland has been included as one of the new supplementary measures set out in the RBMPs. The proposal is to facilitate local groups who wish to establish a River Trust in their area.	A new supplementary measure on the establishment of River Trusts has been included in the RBMPs



## **6 What Happens Next?**

The River Basin Management Plans for the North Western, Neagh Bann and North Eastern River Basin Districts will be published on or before the 22 December 2009. The plans will be reported to the EU Commission, as required under the Water Framework Directive (WFD), by March 2010.

Thereafter the plans will be implemented through 26 Local Management Area action plans on a three year rolling programme over the period 2010 – 2015. Progress on the implementation of the plans will be reported to the Catchment Stakeholder Groups and the WFD Stakeholder Forum.

As required under the WFD, an interim report describing progress in the implementation of the planned programme of measures set out in the plans will be submitted to the EU Commission by December 2012.



## 7 Appendix 1 - List of respondents to the draft River Basin Management Plans

Name	Organisation	Type of response
John Martin	Royal Society for the Protection of Birds NI	dRBMP Consultation Response
Sophia Millington-Ward	Public	dRBMP Consultation Response
Donald Walker	Public	dRBMP Consultation Response
Gary Houston	DCAL, Iveagh Angling Club	dRBMP Consultation Response
Brendan Murphy	Association of Electricity Producers	dRBMP Consultation Response
Dr Bob Common	Public	dRBMP Consultation Response
Keady District Angling Club	Keady District Angling Club	dRBMP Consultation Response
Andrew Murray	DRD, Road Service	dRBMP Consultation Response
John Cunningham	Public	dRBMP Consultation Response
Roy Carton	Angler - Upper River Bush	dRBMP Consultation Response
Liam McLernon	Down District Council External Affairs Committee	dRBMP Consultation Response
George Butler	NI Water	dRBMP Consultation Response
Allen Flemming	Crumlin District Angling Association	dRBMP Consultation Response
Catherine Bertrand	Mourne Heritage Trust Conservation	dRBMP Consultation Response
Helena Rafferty	Newcastle Sustainable Community Planning Forum	dRBMP Consultation Response
John Briggs	Armagh City Council	dRBMP Consultation Response
Claire Cockerill	Freshwater Task Force	dRBMP Consultation Response

Name	Organisation	Type of response
Brendan Kerr	Natural living Assets	dRBMP Consultation Response
Sean Martin	Larne Borough Council	dRBMP Consultation Response
Cathy Burns	Lagan Canal Restoration Trust	dRBMP Consultation Response
Brian McKinley	Randalstown Angling Club	dRBMP Consultation Response
Denice Corbett	Ballysaggart Environmental Group	dRBMP Consultation Response
Bill McCann	Londonderry Port and Harbour commissioners	dRBMP Consultation Response
David Knott	Belfast Harbour Commissioners	dRBMP Consultation Response
Colin McCabrey	Castlereagh Borough Council	dRBMP Consultation Response
Gary Houston	Iveagh Angling Club	dRBMP Consultation Response
Jim Bradley	Belfast Hills Partnership	dRBMP Consultation Response
Martina Magee	Fermanagh District council	dRBMP Consultation Response
John Arneill	Ballynure Angling Club	dRBMP Consultation Response
Declan Lawlor	Loughs Agency	dRBMP Consultation Response
James Gorman	Public	dRBMP Consultation Response
Milton Matthews	Public	dRBMP Consultation Response
Adrian Abbott	British Hydropower Association	dRBMP Consultation Response
Suzanne Lutton	Lisburn City Council	dRBMP Consultation Response
Brian McMullan	WaterWays Ireland	dRBMP Consultation Response
Jim Haughey	Ulster Angling Federation	dRBMP Consultation Response

Name	Organisation	Type of response
Dawson McAlister	Public	dRBMP Consultation Response
William Hogg	Mills and Millers of Ireland	dRBMP Consultation Response
Angela Halpenny	NI Water	dRBMP Consultation Response
M.Dillon (sec)	Clady and District Angling club	dRBMP Consultation Response
John Kelpie	Derry City Council	dRBMP Consultation Response
Laverne Bell	Quarry Products Association NI	dRBMP Consultation Response
Claire Cockerill	World Wildlife Fund NI	dRBMP Consultation Response
Andrew McDowell	National Trust	dRBMP Consultation Response
Joanne Gaffney	Aquaculture Initiative	dRBMP Consultation Response
Patrick Casement	Council for Nature Conservation and Countryside	dRBMP Consultation Response
Stuart Wightman	DRD Water Policy Division	dRBMP Consultation Response
Shay Murtagh Ltd.	Shay Murtagh Ltd.	dRBMP Consultation Response
Aileen Lawson	Ulster Farmers Union	dRBMP Consultation Response
Seamus O'Connell	Irish Business Employers Confederation	dRBMP Consultation Response
Conor Gouldsbury	Irish Business Employers Confederation	dRBMP Consultation Response
Ruth Morgan	Northern Ireland Tourist Board	dRBMP Consultation Response
Tim Gleeson	Soil Physics and Water Researcher (Retired)	dRBMP Consultation Response
P.McCrudden	DARD, Rivers Agency	dRBMP Consultation Response
John Anderson	Friends of Larne Lough	dRBMP Consultation Response

Name	Organisation	Type of response
Mark Henderson	Coleraine Anglers Association	dRBMP Consultation Response
Cllr Cadogan Enright	Down District Council	dRBMP Consultation Response
Sean Convery	Farming and Wildlife Advisory Group NI	dRBMP Consultation Response
David Howard	Bangor Angling Club	dRBMP Consultation Response
Fred Hammond	Industrial Heritage Association of Ireland	dRBMP Consultation Response
Captain B.K.McJury	Warrenpoint Harbour Authority	dRBMP Consultation Response
Fiona Wilson Clerk to the Environment Committee & Committee for Regional Development	Land and Resource Management Group NIEA  Committee for Regional Development and Environment Committee	dRBMP Consultation Response  dRBMP Consultation Response
Rosemary Mulholland CSG Meeting: Strangford and Lecale	Craigavon Borough Council  CSG Meeting: Strangford and Lecale	dRBMP Consultation Response  dRBMP Consultation Response
CSG Meeting: Belfast Lough and Lagan	CSG Meeting: Belfast Lough and Lagan	dRBMP Consultation Response
CSG Meeting: Bush and Glens	CSG Meeting: Bush and Glens	dRBMP Consultation Response
CSG Meeting: Lower Neagh Bann CSG Meeting: Carlingford and Mourne	CSG Meeting: Lower Neagh Bann  CSG Meeting: Carlingford and Mourne	dRBMP Consultation Response  dRBMP Consultation Response
CSG Meeting: Lower Foyle	CSG Meeting: Lower Foyle	dRBMP Consultation Response
CSG Meeting: Upper Foyle	CSG Meeting: Upper Foyle	dRBMP Consultation Response
CSG Meeting: Erne and Melvin	CSG Meeting: Erne and Melvin	dRBMP Consultation Response

Responses were also received from the following; however, the comments are not referred to in detail in the NI consultation response documents unless otherwise stated in the table.

Name	Organisation	Type of response
Bob Common	Public	dRBMP Consultation Response Recorded as dRBMPCon10
Jennifer Robinson	The Consumer Council	dRBMP Consultation Response Recorded as dRBMPCon39
Brendan Murphy	Association of Electricity Producers	dRBMP Consultation Response Recorded as dRBMPCon78
Brendan Murphy	Association of Electricity Producers	dRBMP Consultation Response Recorded as dRBMPCon78
Victor Hamill, Brian Cassells	Lough Neagh and Lower Bann Advisory Committee	Information only
Alice Curran	Newry and Mourne	Information Request
Eamonn Horgann	Waterways Ireland	Information Request
Mandy Kilpatrick	NI Court Service	Nil return
Edward Gorringe	Northern Ireland Judicial Appointments Commission	Nil return
Jim Bowman	Environmental Protection Agency Dublin	ROI related comments
Jim Bowman	Environmental Protection Agency Dublin	ROI related comments
Judith Hoad	Public	ROI related comments
Siobhan Egan	Birdwatch Ireland	ROI related comments
The Heritage Council	The Heritage Council	ROI related comments
Loughs Agency	Loughs Agency	ROI related comments
Claire Timmins	Department of Agriculture, Fisheries and Food	ROI related comments
Teresa Halloran	Environment, Heritage and Local Government	ROI related comments

Martin Murray	Eastern Regional Fisheries Board	ROI related comments
Larry Stapleton	Environmental Protection Agency	ROI related comments The comments related the Strategic Environmental Assessment of the River Basin Plans. This will be addressed by the SEA process.
John Minis	Northern Ireland Environment Agency	The comments related the Strategic Environmental Assessment of the River Basin Plans. This will be addressed by the SEA process.
John Minis	Northern Ireland Environment Agency	The comments related the Strategic Environmental Assessment of the River Basin Plans. This will be addressed by the SEA process.
Seana McGearty	Dept.Communications, Energy and Natural Resources	The comments related the Strategic Environmental Assessment of the River Basin Plans. This will be addressed by the SEA process.
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## 8 Appendix 2 - Glossary of Acronyms

Acronyms	Full Text
AIL	Abstraction and Impoundment Licensing
ASG	Alien Species Group
ASSI	Areas of Special Scientific Interest
BHA	British Hydropower Association
BOD	Biochemical Oxygen Demand
CAFRE	College of Agriculture, Food and Rural Enterprise
COP	Code of Practice
CSG	Catchment Stakeholder Groups
CSO	Combined Sewer Overflows
DARD	Departments of Agriculture and Rural Development
DC	District Council
DCAL	Departments of Culture, Arts & Leisure
DO	Dissolved Oxygen
DRD	Departments of Regional Development
EPA	Environmental Protection Agency
EIA	Environmental Impact Assessment
EQS	Environmental Quality Standards
ENGO	Environmental Non-Governmental Organization
FNMS	Farm Nutrient Management Scheme
FPR	Fish Passage Regulations
FWAG	Farming and Wildlife Advisory Group
FWTF	Freshwater Task Force
GEP	Good Ecological Potential
GES	Good Ecological Status
GQA	General Quality Assessment
HMWB	Heavily Modified Water Bodies
IAS	Invasive Alien Species
ICZM	Integrated Coastal Zone Management
IRBD	International River Basin District
ISI	Invasive Species Ireland
IWG	Implementation Working Group
LMA	Local Management Area
LRM	Land and Resource Management

Acronyms	Full Text
MOSS	Management of Sensitive Sites
NAP	Nitrates Action Programme
NGO	Non-Governmental Organisations
NICCIP	Northern Ireland Climate Change Impacts Partnership
NICMS	Northern Ireland Countryside Management Scheme
NIEA	Northern Ireland Environment Agency
NIW	Northern Ireland Water
NIWL	Northern Ireland Water Limited
OWWTS	On-Site Waste Water Treatment Systems
PAIRS	Projects Aiming to Improve Aquatic Resources
POM	Programme of Measures
PAP	Planning Area Plans
PEPG	Policy and Environmental Planning Group
PPG	Pollution Prevention Guidelines
PPS	Planning Policy Statement
PRP	Pollution Reduction Plans
RBMPs	River Basin Management Plans
RDP	Rural Development Programme
RIA	Regulatory Impact Assessment
ROI	Republic of Ireland
RPA	Review of Public Administration
SAC	Special Areas of Conservation
SCaMP	Sustainable Catchment Management Programme
SEA	Strategic Environmental Assessment
SEPA	Scottish Environment Protection Agency
SPA	Special Protection Areas
TRaC	Transitional and Coastal
UKCIP	UK Climate Impacts Programme
UKTAG	UK Technical Advisory Group
WFD	Water Framework Directive
WMU	Water Management Unit
WWTP	Wastewater Treatment Plant