



# Water matters

*"Have your say!"*

**Western River Basin District**

**Record of Issues  
raised at  
Public Consultation Events  
to discuss the  
"Water Matters" report  
2007**

**In accordance with Article 14 of the European Communities  
(Water Policy)  
Regulations 2003 (S.I. No 7222003)**



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**Appendices**

- 1 Water Matters Consultation Form
- 2 Attendance records from the public meetings

## **1 Introduction**

On 21<sup>st</sup> June 2007, the constituent local authorities within the Western River Basin District (Western RBD) published the booklet ‘Water Matters - Have your say!’

The booklet summarises the main issues affecting the waters in the RBD, how they are causing water problems, what existing controls are in place and what additional actions are proposed to deal with these issues so that the waters in the RBD can achieve Good Status under the Water Framework Directive (WFD) by the end of 2015. The public were invited to submit their comments on the contents of the booklet by the 22<sup>nd</sup> December 2007. These views were invited through written submissions via post and/or the project website ([www.westernrbd.ie](http://www.westernrbd.ie)).

In order to publicise the booklet and obtain comment from the public, a series of evening consultation meetings were hosted by the Western RBD at a number of venues throughout the region during October and November 2007. These events were designed in such a way so as to facilitate group discussion among the attendees on the issues affecting water quality. The format for the meetings was largely informal with presentations being limited to a general overview of the Water Framework Directive and the river basin planning process.

Many of the issues raised verbally were subsequently included in the written submissions received and comprehensive responses are included in a separate document on these written submissions.

## 2 Publicising the consultation events

Seven public information evenings were organised by the Western River Basin District as detailed in Table 1.

**Table 1: Schedule of Public Consultation Meetings 2007**

	<b>Venue</b>	<b>Date</b>
1	Days Hotel, Castlebar, Co. Mayo	10 <sup>th</sup> October
2	Sligo Park, Sligo	5 <sup>th</sup> November
3	Abbey Manor Hotel, Dromahair, Co. Leitrim	6 <sup>th</sup> November
4	Radisson SAS Hotel, Galway City	13 <sup>th</sup> November
5	Station House Hotel, Clifden, Co. Galway	15 <sup>th</sup> November
6	St. Johns Community Hall, Ballyvaughan, Co. Clare	20 <sup>th</sup> November
7	Corralea Hotel, Tuam, Co. Galway	27 <sup>th</sup> November

A comprehensive communication plan was devised for each event detailing the target audiences and the channels most effective at reaching them. There was extensive publicity for each event using print and broadcast mediums with each meeting having extensive pre- event and post- event publicity.

### 2.1 Pre event publicity

The meetings were publicised as follows:

- A promotional flier (Plate 1) was designed and circulated throughout the RBD via
  - Local authorities offices, libraries and public authorities offices.
  - Indirectly to all public representatives (Councillors, Senators, TDs and MEPs) and relevant NGOs in the RBD via the Local Authorities.
  - Indirectly via the relevant Local Authorities to all Community and Voluntary groups through the Community and Enterprise forum of the local authorities
  - All stakeholders, state bodies and members of the POMS OSTWS and Forest and Water groups
- **Western River Basin Advisory Council**
  - The development of the Water Matters booklet was assisted by inputs from the basin Advisory Council representatives. Details of the proposed public meetings were also provided to the Advisory Council and this Council promoted the involvement of participants from their own representative organisations at the public meetings.
- **Websites**
  - The “Invitation” flier was placed prominently on the Western RBD Project website for c. 3 weeks prior to the meetings taking place and throughout the period
  - All Local and Public authorities in the RBD were requested to display the “Invitation” flier prominently on their websites

### 2.1 Pre event publicity

- **Specialised publications**
  - A public notice was published in “Inshore Ireland”, a marine/freshwater environment newspaper published by the Irish Farmers Journal, on Tuesday 9<sup>th</sup> October.
- **Local Print media**
  - **Public Notices** were placed in the local newspapers across the region with the stipulation that the notices been treated as a display advert and placed in the more prominent news section of the paper.
  - **Press Releases** were issued directly to the newspapers to run concurrently with the public notices so as to maximise publicity.
  - An invitation to attend the event was issued to the each news editor along with a request for a staff photographer to cover the event.
  - A press release was issued to the Western Correspondent for the Irish Times.
  - **Radio**
    - A 35 second radio advertisement was scripted and recorded for broadcast at prime times on each of the regional radio stations. The advert was broadcast twice daily in the evening drive time spots and in advance of the prime time current affairs programme on each of the regional radio stations. On average each meeting received 8 days promotional airtime prior to the event.
    - Pat Canney Project Co-ordinator and Dr. Paddy Kavanagh, Project Manager were given interview slots on the current affairs programmes on a number of regional radio stations.

### 2.2 Post event publicity

At each meeting, attendees were photographed by either an attending press photographer or by the event organiser from the Western RBD team. These photographs were subsequently issued to the local papers.

Plate 2 Water Matters “Have your say” information leaflet

**PUBLIC CONSULTATION MEETINGS**  
**Western River Basin District**  
**and the Local Authorities invites you to ..**

## Water matters

*“ Have your say! ”*

You are invited to give your views at our Public Consultation Meetings on the key issues affecting the waters in the Western River Basin and in your local area. This is your opportunity to offer solutions to protect and sustain your rivers, lakes, estuaries, coastal waters and groundwater.

Whether you run a farm or an industrial business, are a member of an angling club or a conservation group, are involved in a community group or just want to know more about your local water environment, come along and have **your** say.

All **meetings start at 7.00pm** and refreshments will be provided. For more information, please contact Pat Canney 091-746804, or email [pcanney@galwaycoco.ie](mailto:pcanney@galwaycoco.ie). For a copy of the Water Matters booklet or to contact a member of the Western RBD Advisory Council, please visit [www.westernrbd.ie](http://www.westernrbd.ie).





**SCHEDULE OF PUBLIC MEETINGS 2007: Meetings start at 7.00 pm**

Date	Location	Venue
Wed 10th Oct	Castlebar, Co. Mayo	Days Hotel Castlebar
Mon 5th Nov	Sligo Town, Co. Sligo	Sligo Park Hotel
Tues 6th Nov	Dromahair, Co. Leitrim	Abbey Manor Hotel,
Tues 13th Nov	Galway City	Radisson SAS Galway City
Thurs 15th Nov	Clifden, Co. Galway	Station House Hotel Clifden
Tues 20th Nov	Ballyvaughan, Co. Clare	St. Johns Community Hall, Ballyvaughan
Tues 27th Nov	Tuam, Co. Galway	Corralea Court Hotel





  
 National Development Plan 2007 - 2013  
 An t-Údarás um an t-Éireann agus na h-Éireann  
 The Department of the Environment, Heritage and Local Government

### **3 Record of Public Consultation Events**

The following is a synopsis of issues raised by members of the public at the information evenings. The issues are grouped under the venue where the event was held. The issues are not placed in order of importance. It should be noted that it was not obligatory to sign the attendance sheet and a number of attendees did not sign the sheet. A headcount was conducted at each meeting to ascertain an accurate number of attendees.

Each meeting followed the same format:

- Welcome (by host Local Authority)
- Presentation – Overview of the Water Framework Directive and the river basin planning process
- Presentation and Discussion: Public participation through open discussions on the Significant Water Management Issues.

#### **Issues Covered**

- ✓ Urban Waste Water Treatment and Industrial Discharges
  - ✓ Landfills, Quarries, Mines and Contaminated Lands
  - ✓ Abstractions
  - ✓ Physical modifications
  - ✓ Agriculture
  - ✓ Local Issues
  - ✓ Dangerous substances
  - ✓ Forestry
  - ✓ Unsewered areas
  - ✓ Infrastructure
  - ✓ Development
- Participants were provided with Water Matters consultation forms to complete (Appendix 1) either on the night or at their leisure, to be posted to the Project office by the 22<sup>nd</sup> of December 2007.
  - The DVD “Flowing to the Future” (which was specially commissioned by the RBD Projects to raise awareness of the main pressures acting on our waters) was set up to play in the background before and during coffee breaks if people wished to view it.

**Venue:** Days Hotel, Castlebar, Co. Mayo

**Attendance:** Final headcount indicated 39 attendees

**Opening Address:** Patsy Burke, Senior Engineer, Mayo County Council

**Speakers:** Pat Canney, Project Co-ordinator, Paddy Kavanagh, ESBI, Rose Walsh, ESBI, Cuán O'hOgan, WYG, Aisling Whelan, O'Neill Groundwater Engineering.

### **Issues Raised**

#### Wastewater Discharges

- Calls were made for improvements to Waste Water Treatment Plants particularly for the reduction of coli forms and viruses.
- Threat from partially treated landfill and sludge leachates to coastal waters.
- Landfill leachates should not be discharged to sensitive coastal waters.
- Improved methods for dealing with wastewater in particular persistent organic pollutants, which are largely ignored

#### Industrial Discharges

- Increased treatment of Industrial wastes prior to discharge and greater supervision of this area.
- Concerns were raised on the continuing discharge of industrial waste containing mercury to coastal waters

#### Wastewater from unsewered Areas

- Concerns were raised over the lack of ongoing checks and standards for the maintenance of septic tanks.
- Increased supervision of septic tank installation
- Supervision and accountability for contractors who empty septic tanks.

#### Forestry

- Concern was expressed over the affects of tree felling and forestry on water quality.

#### Dangerous Substances

- Excessive use of household cleaners has an adverse affect on the effectiveness of septic tanks.

#### Public Awareness

- A National TV campaign is required to educate the public on the necessity of regular septic tank maintenance.
- A high profile advertising campaign is required to educate the public on domestic pollutions from household cleaners and the effect these have on septic tanks.

#### Implementation of WFD

- Calls were made for severe penalties on the polluter including Local Authorities, Farmers, and Industry.



**3.2 Sligo                    5<sup>th</sup> November 2007**

**Venue:** Sligo Park Hotel, Sligo

**Attendance:** Final Headcount indicated 41 attendees

**Opening Address:** Rita Mc Nulty, Director of Service, Sligo County Council

**Speakers:** Pat Canney Western RBD Project Co-ordinator, Paddy Kavanagh, Project Manager, ESBI.

**Issues Raised**

Wastewater discharges

- Greater consultation is needed between the Planning Departments, Water Services and Environment Sections in the Local Authorities regarding large scale development
- Concerns were expressed over the overloading of the LA Waste Water Treatment plants.
- Concerns were raised over the spreading of sewage sludge from LA plants on to land and the implications of this sludge discharging into local rivers and streams.
- Inadequate resources allocated to the Local Authorities to deal with the growing problems of pollution.
- Concerns were raised over the spreading of hospital waste on land and the danger of variant CJD being spread by this process.
- More accountability for LA officials.

Quarries

- Quarrying can take place from 4.00am to 8.00am, and there is no one available at these times to monitor this activity.

Agriculture

- Local Authorities should not use the protection of water as a means of raising revenue by overcharging farmers.
- Agricultural Discharges to groundwater.
- How can all the emission sources from farms be identified?
- Farms should be individually licensed like Industry with IPC Licences.

Wastewater unsewered Areas

- Grant aid will be required to upgrade faulty septic tanks.
- There is a need for a National Certification for the installation and maintenance of Onsite Waste Water Treatment Plants and Septic tanks.
- Domestic Sewage- Septic Tanks should be checked and monitored at the discharge point.

Forestry

- Concerns were raised over forestry practices, especially the felling of trees and the nutrient overloading from Forests on poor soils.
- The use of Riparian Zones was suggested as a means of absorbing nutrients.

## **Report on SWMI Public Comments Rev 001**

### Dangerous Substances

- Over use of household detergents containing phosphates affects water quality.

### Local Issues

- In order to encourage full co-operation between the Farming Community and the Local Authority, Sligo County Council should review the current water charges to farmers.
- Dromore West: The Local Authority has an outflow to the riverbank in Dromore West, why is this allowed?
- Lough Gara: Following the drainage of this lake between 1950 and 1953 by the Board of Works, too much water was drained leading to the destruction of the fish beds. The Lake continues to deteriorate and stagnate. An initial promise by the BOW to erect floodgates at the lower outlet of the lake has not been fulfilled. This lake needs urgent attention in order to maximise its natural potential.

### Public Consultation Process

- Trust between individuals and the establishment is very low. The consultation process in Ireland is a discredited process. Risk Communication Models should be integrated with the public consultation Process.
- Composition of the Advisory Council: There is not a fair geographical representation of the farming community on the Advisory Council with the two farming representatives coming from the same county.

### Implementation of WFD

- Following the failure to implement the Nitrates Directive fully, is it now likely that the WFD will not be implemented properly to adequately safeguard against water pollution?
- Concerns were expressed that the WFD will not be implemented in a uniform manner nationwide but instead will be used as a pretext for additional taxation.

### 3.3 Dromahair, Co. Leitrim

6<sup>th</sup> November 2007

**Venue:** Abbey Manor Hotel, Dromahair, Co. Leitrim

**Attendance:** Final headcount indicated 15 attendees.

**Opening Address:** Martin Dolan, Director of Service, Sligo County Council,

**Speakers:** Pat Canney Western RBD Project Co-ordinator, Paddy Kavanagh, Project Manager, ESBI

#### Wastewater discharges

- There should be more sewage treatment plants on proper sites.

#### Wastewater from unsewered Areas

- The Government should offer a subsidy to encourage the upgrading of septic tanks

#### Public Awareness

- Greater engagement is needed with the Public. It was proposed that a National Day be held to celebrate our Rivers and Lakes.
- The An Taisce Green Schools Programme could be used to promote awareness of the WFD in schools nationwide.
- The protection of our waterbodies should not be presented as a problem but as a challenge.
- The public should be made aware of areas at high risk of pollution to groundwater.
- There should be a public awareness campaign to highlight the phosphates in household detergents and the affects that phosphates has on water quality.

#### Local Issues

- Concerns were expressed over the close proximity of Leitrim County Council's sewage treatment plant on the banks of the Bonet River. This river is the source of water for the North Leitrim water supply.

#### Climate Change

- The effect of climate change on waterbodies has not been adequately explored in the Water Matters booklet.

#### Infrastructure

- There should be a National Plan aimed at building proper reservoirs nationwide.
- Forward planning for the future growth of towns is a necessity to ensure facilities such as sewage, water, schools, energy and community centres are in place.
- Is the County Development Plan in line with the objectives of the WFD?

### 3.4 Galway City 13<sup>th</sup> November 2007

**Venue:** Radisson SAS Hotel, Galway

**Attendance:** Final headcount indicated 36 attendees

**Opening Address:** Tom Heron, Director of Service, Environment Section, Galway City Council.

**Speakers:** Pat Canney Western RBD Project Co-ordinator, Paddy Kavanagh, Project Manager, ESBI.

#### Wastewater and Industrial discharges

- There is a need for a Sludge Management Plan for the county.
- Methane gas should be removed from slurry before it is spread on the land
- Land spreading of sludge from waste water treatment systems is infiltrating through the soil into groundwater.

#### Landfills, Quarries, Mines

- Quarries are drawing from groundwater and this reduces the water table levels.

#### Agriculture

- Concerns were raised over the practice of spreading slurry and fertilizers on land and the effects of runoff into local rivers and streams.

#### Wastewater from unsewered Areas

- Septic Tanks: Pollution to groundwater from septic tanks.
- Proliferation of septic tanks on thin soil.
- There is uncontrolled discharge to rivers.
- Lack of joined up thinking as there are still developments being built in areas without adequate sewerage systems.
- Up to 80% of septic tanks in the country are faulty. The cost of remedying them will be substantial. Has the Government completed any preliminary costings for this?

#### Forestry

- Concerns were raised about Forestry on acid soils, which are fertilised, by rock phosphates and the clearfelling of trees.

## **Report on SWMI Public Comments Rev 001**

### Local Issues

- Concerns were raised over the Cryptosporidium outbreak in the water supply in Galway and the failure of the City Council to identify the source of the pollution.
- Is testing of potable water for the presence of cryptosporidium mandatory?
- Concerns were raised over the capacity of the Mutton Island wastewater treatment system as an adequate facility for the growing population of Galway.
- Uncontrolled discharge of untreated sewage, which is being discharged into the sea at Spiddal.
- The use of pesticides in gardening and the implications this has on water quality especially in Galway Bay.
- The swans at the Claddagh have changed from white to pink, is this due to water pollution?
- The old municipal dump at South Park is deemed unsafe, as there are elevated levels of metals present. Old Municipal dumps such as South Park and Carrabrowne should be closely monitored by the EPA.
- The new Development Plan for Barna has reduced the buffer zone, how will this impact on water in the area?

### Alien Species /Invasive Species

- Zebra Mussels: The Minister for the Environment should implement bye-laws, which will require written permission for the movement of all boats.
- The Tourism Sector especially Leisure Cruisers needs to be informed of the dangers of Zebra Mussels.

### Aquaculture

- The pressures from Aquaculture is not fully addressed in the SWMI report, why is this?

### Public Consultation

- There should be further consultation with the Irish Association of Hydrogeologists (IAH) and the Irish Geological Institute.
- Water Recycling such as the collection of water off roofs must be promoted.
- There should be a comprehensive public campaign aimed at changing the public's attitude to water. Water should be viewed as a valuable commodity and not an endless resource, this change of attitude should come first from the Local Authority who stop water wastage by fixing leakages in their potable water systems.
- There is a need for a National Awareness Programme on the dangers of introducing invasive species into our indigenous habitats.
- The public should be advised to use water tanks for car washing and gardening.

## **Report on SWMI Public Comments Rev 001**

- Concerns were raised over the Governments commitment to the WFD and will the Government provide the necessary resources for its proper implementation.
- The Local Authorities should be provided with additional resources to maintain and monitor smaller treatment plants.
- Local Authorities should make all findings on water testing public.

### Co-ordinated legislation

- Other legislation and guidelines should also be taken into account, e.g. the specifications for well drilling should be included as these specifications ensures wells are screened appropriately to prevent infiltration of pollutants. Can these guidelines become legal requirements?

### Implementation of WFD

- Will the Western RBD have the power to police the implementation of the WFD? And if so, will the Western RBD pursue action against Galway County Council if the Local Authority fails to protect water?
- Will the WFD contribute and influence future County Development Plans?
- The reference level in the WFD is not sufficient to protect high quality sites such as Lough Corrib. A separate standard is required for high quality sites. The Western River Basin District should admit that the WFD is insufficient at maintaining “high” status as opposed to “good” status for certain areas.
- The remit of the Western River Basin District is unclear, will they be enforcing the WFD.

### Infrastructure and Resources

- A National Reference Laboratory is needed for the testing of water samples.
- Water samples had to be sent to laboratories in Glasgow for testing (related to Cryptosporidium), this is more costly; we should have adequate facilities here to do our own testing.
- Building development on wetlands and floodplains should be stopped.
- NUIG, GMIT and Sligo IT should have greater involvement in research proposals.

### **3.5 Clifden, Co. Galway**

**15<sup>th</sup> November 2007**

**Venue:** Station House Hotel, Clifden, Co. Galway

**Attendance:** Final headcount indicated 8 attendees

**Opening address:** Pat Canney, Project Co-ordinator

**Speaker:** Dr. Paddy Kavanagh, Project Manager.

#### Wastewater and Industrial discharges

- There has been a greater emphasis for large-scale housing developments in our local towns and villages and often these are built without due regard to the capability of the existing sewage systems

#### Agriculture

- The current regulations on slurry spreading is impractical, you cannot spread slurry by set dates only by appropriate weather conditions. Slurry was spread according to the dates specified in the regulations and then 3 days later it rained causing the slurry to flow into the Corrib.
- Was the recent Cryptosporidium outbreak caused by animal waste or human waste?

#### Forestry

- What about forests planted on peat lands? This also impacts on water quality

#### Local Issues

- Concerns were raised over the contamination from the local sewage plant in Clifden. The bathing water in the area has been affected. There is also contamination of shellfish.
- 8.5 Million euros was earmarked for a new sewage treatment plant but nothing has been built yet, now there are fears that this money will be allocated elsewhere.
- The heather on the high ground has been overgrazed by sheep, this has resulted in increased runoff from the uplands to the lowlands, streams have widen and are more shallow and fish can not move up stream.
- The drinking water in Clifden is blue with a very strong smell of chlorine; hence it stains sinks and toilets.

**3.6 Ballyvaughan, Co. Clare      20<sup>th</sup> November 2007**

**Venue:** Ballyvaughan Community Hall,

**Attendance:** Final headcount indicated 13 attendees.

**Opening address:** Sean Ward, Clare County Council

**Speaker:** Dr. Paddy Kavanagh, Project Manager, ESBI

Wastewater discharges

- There is a need for increased investment in modern treatment systems that have the capacity to cater for increases in population growth.
- The current planning system needs to be overhauled with the increased collaboration between the Environment and Planning Departments in the Local Authority.
- There should be no development unless the proper treatment systems are already in place.

Illegal landfills

- Building materials and other rubbish in ad hoc sites should be punished by heavy fines.
- There should be larger fines for illegal dumping in our rivers and streams.

Agriculture

- The spreading of slurry should be regulated.
- Tighter controls on farming activity with realistic fines for farmers who are not adhering to good farming practice.

Wastewater from unsewered areas

- One-off housing should be discouraged; new housing developments should be incorporated into the existing sewage systems in our towns.
- There were calls for septic tank inspection with a certificate of maintenance for all septic tanks in the country.

Local Issues

- Concerns were raised over the local drinking water supply; it has a very strong smell of chlorine and is undrinkable.
- Concerns were raised over the quality of the Coastal waters around Clare, it is very poor and this is affecting the local shellfish population. Research is needed in the area.
- There is too much chlorine in the local water supply.



## Report on SWMI Public Comments Rev 001

### Public Awareness

- The local people feel disconnected from the decision making process, this is their first opportunity to engage with officialdom
- People have become very cynical about the public consultation process, will their opinions be really valued.

### Monitoring

- There is too much emphasis on ecological and chemical monitoring when there should be greater emphasis on bacterial monitoring.
- Some of the Local Authorities are also responsible for pollution, who is going to police them?

## **3.7 Tuam, Co. Galway 27<sup>th</sup> November 2007**

**Venue:** Corralea Court Hotel, Tuam, Co. Galway.

**Attendance:** Final headcount indicated 33 attendees

**Speaker:** Dr. Paddy Kavanagh, Project Manager, ESBI

### Wastewater discharges

- The standard of the design and operation of the County Council's WWTPs is not adequate.
- The upgrade of urban treatment plants is urgently required.
- There should be stringent standards for future planning and urgent action is needed to upgrade existing facilities along with the establishment of new facilities.

### Industrial discharges

- The group queried if there are any plans to control the development of industry beside rivers?

### Agriculture

- Dumping of dead animals into the rivers is a major concern; heavy penalties should be imposed on offenders.
- Spreading of slurry close to rivers and drains should be prohibited.
- The code of Agriculture practice is not being enforced by the Dept. of Agriculture. The ban on slurry spreading between October and January is being broken.
- Remove some slurry spreaders and tanks from farms in areas of poor soils and replace with the side spreaders, which spreads solid waste and not liquid.
- Calls are made for a change in the way sheep are treated for worms/maggots as surplus liquid, which is released after use is highly dangerous.
- Enrichment due to over fertilization of land.

## **Report on SWMI Public Comments Rev 001**

### Wastewater from unsewered areas

- There is a basic lack of knowledge by homeowners on the necessary maintenance of septic tanks.
- There is a need for the introduction of bye-laws for the cleaning of septic tanks on an annual basis. One off housing should not be built in flood plains

### Forestry

- There is a need for a review of current forestry practices especially with regard to acidification of waterbodies due to forestry.

### Dangerous substances

- There should be a ban on harmful household chemicals.
- Concerns were raised over open storm water drains, which are discharging dangerous substances straight into rivers.

### Abstraction

- There should be greater emphasis on the water conservation in the booklet.

### Public awareness

- The public awareness campaign should be aimed at school children.
- There should be information packs designed specifically for schools promoting the rich heritage and importance of our waterbodies.

### Alien species /Invasive species

- The public should be informed of the dangers posed by the Zebra mussel to our indigenous species.

### Monitoring

- The EPA should review reports compiled by Local Authorities. The EPA should be the lead authority on enforcing compliance. All licensing for wastewater treatment plants should come from the EPA.
- There should be open prosecutions for Local Authorities for not implementing standards.

### Marine Waters

- Concerns were raised over Aquaculture; attendees felt that this pressure was not adequately covered in the water matters booklet.

## **4 Summary of Issues raised by Subject**

### **Topic 1: Wastewater and Industrial Discharges**

- Calls were made for improvements to Waste Water Treatment Plants particularly for the reduction of coli forms and viruses.
- Threat from partially treated landfill and sludge leachates to coastal waters.
- Landfill leachates should not be discharged to sensitive coastal waters.
- Improved methods for dealing with wastewater in particular persistent organic pollutants, which are largely ignored
- Greater consultation is needed between the Planning Departments, Water Services and Environment Sections in the Local Authorities regarding large scale development
- Concerns were expressed over the overloading of the LA Waste Water Treatment plants.
- Concerns were raised over the spreading of sewage sludge from LA plants on to land and the implications of this sludge discharging into local rivers and streams.
- Inadequate resources allocated to the Local Authorities to deal with the growing problems of pollution.
- Concerns were raised over the spreading of hospital waste on land and the danger of variant CJD being spread by this process.
- LA officials should be held accountable for failing to do their jobs.
- There should be more sewage treatment plants on proper sites.
- There is a need for a Sludge Management Plan for the county (Galway City Meeting).
- Methane gas should be removed from slurry before it is spread on the land
- Land spreading of sludge from Waste Water Treatment Systems is infiltrating through the soil into groundwater.
- There has been a greater emphasis for large-scale housing developments in our local towns and villages and often these are built without due regard to the capability of the existing sewage systems.
- There is a need for increased investment in modern treatment systems that have the capacity to cater for increases in population growth.
- The current planning system needs to be overhauled with the increased collaboration between the Environment and Planning Departments in the Local Authority.
- There should be no development unless the proper treatment systems are already in place.
- The standard of the design and operation of the County Council's WWTPs is inadequate.
- The upgrade of urban treatment plants is urgently required.
- There should be stringent standards for future planning and urgent action is needed to upgrade existing facilities along with the establishment of new facilities.
- Increased treatment of Industrial Wastes prior to discharge and greater supervision of this area.

## **Report on SWMI Public Comments Rev 001**

- Concerns were raised on the continuing discharge of industrial waste containing mercury to coastal waters.
- Will there be any plans to control the development of industry beside rivers?

### **Topic 2: Landfills, Quarries, Mines and Contaminated Lands**

- Quarrying can take place from 4.00am to 8.00am, and there is no one available at these times to monitor this activity.
- Quarries are drawing from groundwater and this reduces the water table levels.
- Building materials and other rubbish in ad hoc sites should be punished by heavy fines.
- There should be larger fines for illegal dumping in our rivers and streams.

### **Topic 3: Agriculture**

- Dumping of dead animals into the rivers is a major concern; heavy penalties should be imposed on offenders.
- Spreading of slurry close to rivers and drains should be prohibited.
- The code of Agriculture practice is not being enforced by the Dept. of Agriculture. The ban on slurry spreading between October and January is being broken.
- Remove some slurry spreaders and tanks from farms in areas of poor soils and replace with the side spreaders, which spreads solid waste and not liquid.
- Calls are made for a change in the way sheep are treated for worms/maggots as surplus liquid, which is released after use is highly dangerous.
- Enrichment due to over fertilization of land.
- The spreading of slurry should be regulated.
- Tighter controls on farming activity with realistic fines for farmers who are not adhering to good farming practice.
- The current regulations on slurry spreading is impractical, you cannot spread slurry by set dates only by appropriate weather conditions. Slurry was spread according to the dates specified in the regulations and then 3 days later it rained causing the slurry to flow into the Corrib.
- Was the recent Cryptosporidium outbreak caused by animal waste or human waste?
- Concerns were raised over the practice of spreading slurry and fertilizers on land and the effects of runoff into local rivers and streams.
- Local Authorities should not use the protection of water as a means of raising revenue by overcharging farmers.
- How can all the emission sources from farms be identified?
- Farms should be individually licensed like Industry with IPC Licences.

**Topic 4: Wastewater from Unsewered Properties**

- There is a basic lack of knowledge by homeowners on the necessary maintenance of septic tanks.
- There is a need for the introduction of bye-laws for the cleaning of septic tanks on an annual basis. One off housing should not be built in flood plains
- One-off housing should be discouraged; new housing developments should be incorporated into the existing sewage systems in our towns.
- There were calls for septic tank inspection with a certificate of maintenance for all septic tanks in the country.
- Proliferation of septic tanks on thin soil.
- There is uncontrolled discharge to rivers.
- Lack of joined up thinking as there are still developments being built in areas without adequate sewerage systems.
- Up to 80% of septic tanks in the country are faulty. The cost of remedying them will be substantial. Has the Government completed any preliminary costings for this?
- The Government should offer a subsidy to encourage the upgrading of septic tanks.
- Grant aid will be required to upgrade faulty septic tanks.
- There is a need for a National Certification for the installation and maintenance of Onsite Waste Water Treatment Plants and Septic tanks. Domestic Sewage- Septic Tanks should be checked and monitored at the discharge point.
- Concerns were raised over the lack of ongoing checks and standards for the maintenance of septic tanks.
- Increased supervision of septic tank installation
- Supervision and accountability for contractors who empty septic tanks.

**Topic 5: Forestry**

- There is a need for a review of current forestry practices especially with regard to acidification of waterbodies due to forestry.
- What about forests planted on peat lands? This also impacts on water quality
- Concerns were raised about Forestry on acid soils, which are fertilised, by rock phosphates and the clearfelling of trees.
- Concerns were raised over forestry practices, especially the felling of trees and the nutrient overloading from Forests on poor soils.
- The use of Riparian Zones was suggested as a means of absorbing nutrients.

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### **Topic 6: Usage and Discharge of Dangerous Substances**

- There should be a ban on harmful household chemicals.
- Concerns were raised over open storm water drains, which are discharging dangerous substances straight into rivers.
- Over use of household detergents containing phosphates affects water quality.
- Excessive use of household toilet cleaners has an adverse affect on the effectiveness of septic tanks

### **Topic 8: Abstractions**

- There should be greater emphasis on the water conservation in the booklet.

### **Topic 9: Local Issues**

#### **Ballyvaughan, Co. Clare**

- Concerns were raised over the local drinking water supply; it has a very strong smell of chlorine and is undrinkable.
- Concerns were raised over the quality of the Coastal waters around Clare, it is very poor and this is affecting the local shellfish population. Research is needed in the area.

#### **Clifden, Co. Galway**

- Concerns were raised over the contamination from the local sewage plant in Clifden. The bathing water in the area has been affected. There is also contamination of shellfish.
- 8.5 Million was earmarked for a new sewage treatment plant but nothing has been built yet, now there are fears that this money will be allocated elsewhere.
- The heather on the high ground has been overgrazed by sheep, this has resulted in increased runoff from the uplands to the lowlands, streams have widen and are more shallow and fish can not move up stream.
- The drinking water in Clifden is blue with a very strong smell of chlorine; hence it stains sinks and toilets.

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### **Galway City**

- Concerns were raised over the cryptosporidium outbreak in the water supply in Galway and the failure of the City Council to identify the source of the pollution.
- Is testing of potable water for the presence of cryptosporidium mandatory?
- Concerns were raised over the capacity of the Mutton Island Wastewater Treatment system as an adequate facility for the growing population of Galway.
- Uncontrolled discharge of untreated sewage, which is being discharged into the sea at Spiddal.
- The use of pesticides in gardening and the implications this has on water quality especially in Galway Bay.
- The swans at the Claddagh have changed from white to pink, is this due to water pollution?
- The old municipal dump at South Park is deemed unsafe, as there are elevated levels of metals present. Old Municipal dumps such as South Park and Carrabrown should be closely monitored by the EPA.
- The new Development Plan for Barna has reduced the buffer zone, how will this impact on water in the area?

### **Dromahair, Co. Leitrim**

- Concerns were expressed over the close proximity of Leitrim County Council's sewage treatment plant on the banks of the Bonet River. This river is the source of water for the North Leitrim water supply.

### **Sligo**

- In order to encourage full co-operation between the Farming Community and the Local Authority, Sligo County Council should address the unfair water charges, which are being charged to farmers in the county.
- Dromore West: The Local Authority has an outflow to the riverbank in Dromore West, why is this allowed?
- Lough Gara: Following the drainage of this lake between 1950 and 1953 by the Board of Works, too much water was drained leading to the destruction of the fish beds. The Lake continues to deteriorate and stagnate. An initial promise by the BOW to erect floodgates at the lower outlet of the lake has not been fulfilled. This lake needs urgent attention in order to maximise its natural potential.

### Topic 10: Public Awareness

- A National TV campaign is required to educate the public on the necessity of regular septic tank maintenance.
- A high profile advertising campaign is required to educate the public on domestic pollutions from household cleaners and the effect these have on septic tanks.
- Trust between individuals and the establishment is very low. The consultation process in Ireland is a discredited process. Risk Communication Models should be integrated with the public consultation Process. More effective consultation with the public is needed.
- There is not a fair geographical representation of the farming community on the Advisory Council with the two farming representatives coming from the same county.
- Greater engagement is needed with the public. It was proposed that a National Day be held to celebrate our Rivers and Lakes.
- The An Taisce Green Schools Programme could be used to promote awareness of the WFD in schools nationwide.
- The protection of our waterbodies should not be presented as a problem but as a challenge.
- The public should be made aware of areas at high risk of pollution to groundwater.
- There should be a public awareness campaign to highlight the phosphates in household detergents.
- There should be further consultation with the Irish Association of Hydrogeologists (IAH) and the Irish Geological Institute.
- Water Recycling such as the collection of water off roofs must be promoted.
- There should be a comprehensive public campaign aimed at changing the public's attitude to water. Water should be viewed as a valuable commodity and not an endless resource, this change of attitude should come first from the Local Authority who stop water wastage by fixing leakages in their potable water systems.
- There is a need for a National Awareness Programme on the dangers of introducing invasive species into our indigenous habitats.
- The public should be advised to use water tanks for car washing and gardening.
- Concerns were raised over the Governments commitment to the WFD and will the Government provide the necessary resources for its proper implementation.
- The Local Authorities should be provided with additional resources to maintain and monitor smaller treatment plants.
- Local Authorities should make all findings on water testing public.
- The local people feel disconnected from the decision making process, this is their first opportunity to engage with officialdom
- People have become very cynical about the public consultation process, will their opinions be really valued.
- The public awareness campaign should be aimed at school children.
- There should be information packs designed specifically for schools promoting the rich heritage and importance of our waterbodies.



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### **Topic 11: Alien species /Invasive species**

- The public should be informed of the dangers posed by the Zebra mussel to our indigenous species.
- The Minister for the Environment should implement bye-laws, which will require written permission for the movement of all boats.
- The Tourism Sector especially Leisure Cruisers needs to be informed of the dangers of Zebra Mussels.

### **Topic 12: Additional Issues**

#### **Climate Change**

- The effect of climate change on waterbodies has not been adequately explored in the Water Matters booklet.

#### **Monitoring**

- The EPA should review reports compiled by Local Authorities. The EPA should be the lead authority on enforcing compliance. All licensing for wastewater treatment plants should come from the EPA.
- There should be open prosecutions for Local Authorities for not implementing standards.
- There is too much emphasis on ecological and chemical monitoring when there should be greater emphasis on bacterial monitoring.
- Some of the Local Authorities are also responsible for pollution, who is going to police them?

#### **Marine Waters**

- Concerns were raised over Aquaculture; attendees felt that this pressure was not adequately covered in the water matters booklet.

#### **Illegal landfills**

- Building materials and other rubbish in ad hoc sites should be punished by heavy fines.
- There should be larger fines for illegal dumping in our rivers and streams.

#### **Co-ordinated legislation**

- Other legislation and guidelines should also be taken into account, e.g. the specifications for well drilling should be included as these specifications ensures wells are screened appropriately to prevent infiltration of pollutants. Can these guidelines become legal requirements?

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### **Implementation of WFD**

- Will the Western RBD have the power to police the implementation of the WFD? And if so, will the Western RBD pursue action against Galway County Council if the Local Authority fails to protect water?
- Will the WFD contribute and influence future County Development Plans?
- The reference level in the WFD is not sufficient to protect high quality sites such as Lough Corrib. A separate standard is required for high quality sites. The Western River Basin District should admit that the WFD is insufficient at maintaining “high” status as opposed to “good” status for certain areas.
- The remit of the Western River Basin District is unclear, will they be enforcing the WFD.
- Following the failure to implement the Nitrates Directive fully, is it now likely that the WFD will not be implemented properly to adequately safeguard against water pollution?
- Concerns were expressed that the WFD will not be implemented in a uniform manner nationwide but instead will be used as a pretext for additional taxation.
- Calls were made for severe penalties on the polluter including Local Authorities, Farmers, and Industry.

### **Infrastructure and Resources**

- A National Reference Laboratory is needed for the testing of water samples. Water samples had to be sent to laboratories in Glasgow for testing (related to Cryptosporidium), this is more costly; we should have adequate facilities here to do our own testing.
- Building development on wetlands and floodplains should be stopped.
- NUIG, GMIT and Sligo IT should have greater involvement in research proposals.

## **Response to Issues raised by the public**

### **5 Conclusions and Recommendations**

The public consultation events were organised to publicise the ‘Water Matters – Have your say’ booklet and to make the public aware of the period of consultation on the booklet up to the 22<sup>nd</sup> of December 2007. The consultation process resulted in many issues being raised, verbally at the meetings themselves, which were recorded and summarised in this document, as also through written submissions on the topics raised and discussed. Many of the issues raised verbally were subsequently included in the written submissions received and comprehensive responses are included in a separate document on these written submissions.

The primary objective of the Public Meetings was to encourage the submission of comments on the document and ultimately inform the development of the RBMP (River Basin Management Plan).

Approximately 185 people attended the 7 events held, and while this turnout could be regarded as generally low, it comprised of participants from all sectors of society and stakeholders in the basin. Informative debates occurred at each meeting and relevant comments were received as a result of the process.

Critical issues were identified through the process. These included concerns over the adequacy of existing wastewater treatment facilities, both local authority and industrial, to deal with existing and new development pressure experienced in Ireland’s unprecedented growth period. The need for additional infrastructure to meet the demands of growing communities and the need for new infrastructure development, in a timely manner, to support sustainable development in the basin was also identified. Management of waste sludges from such treatment facilities was also a concern. Closer cooperation between Local Authority Planning, Environment and Water Services Sections to ensure a comprehensive approach to ensuring sustainable development and the protection of our natural resources was also seen as an issue. This was regarded as essential to building of trust in the “competent” authorities (i.e. the local authorities and the EPA) as set out in the Water Policy Regulations (SI 722 of 2003) and who are responsible for the protection of waters in the basin. Other major issues were highlighted at the meetings. These included management and operation of quarries, illegal waste disposal, issues associated with forests on areas liable to acidification or situated on peat lands and forestry management practices including the need for riparian zones development. Agricultural issues were also prominent including enrichment of waters from agricultural practice; need for greater enforcement of nitrates regulations and the difficulties in adhering to these regulations and greater controls over sheep dip materials. Water charges for agricultural use were also raised as an area of concern to the agricultural community. The proliferation of one off housing requiring individual treatments systems also gave cause for concern. Issues such as the correct siting, certification and maintenance of such systems were raised and the introduction of Bye Laws, coupled with grant aided improved systems

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and an accompanying public information programme were suggested to deal with this issue. Individual household issues were also raised such as the use and disposal of potentially harmful household chemicals. In the marine environment the lack of assessment of aquaculture as a pressure in the SWMI publication was highlighted.

In addition to national issues many issues of local importance were also raised. In particular these included concerns over drinking water quality and the need to protect these resources e.g. North Leitrim Water Supply and cryptosporidium contamination of the source and supply in Galway City; Quality of our coastal waters (Clare and Galway); Coastal discharges e.g. Clifden and Spiddal sewage treatment requirement and the capacity of the Galway City wastewater treatment plant at Mutton Island; Bathing water and shellfish water quality issues; Old closed landfills e.g. South Park and Carrowbrowne in Galway; catchment drainage issues e.g. Lough Gara in Sligo; Public awareness concerning invasive alien species and the need to inform boat owners of the dangers of boat movements.

The enforcement of existing regulations was seen as essential if there is to be an improvement while the need for infrastructure to be in place ahead of development was also highlighted. In addition the Local Authorities must be adequately resourced to implement the measures required to combat pollution and maintain water quality. The need for linkage between all the various plans and programmes to allow 'joined-up thinking' was recognised.

Overall good support was expressed for the Water Framework Directive (WFD) process, with agreement that this was an opportunity to put things right.

The need for increased education/awareness programmes and events coupled to the timeline of the WFD was frequently raised by the attendees and in particular the need to demonstrate practically, where possible, cause and effect and how actions could improve water quality. The questions raised indicated some general confusion as to the roles and responsibilities of the different players involved in the implementation of the WFD in Ireland, this despite the fact that this is clearly set out on the River Basin's website ([www.westernrbd.ie](http://www.westernrbd.ie)) and on the national WFD website ([www.wfdireland.ir](http://www.wfdireland.ir)).

Overall it was recognised that unless the proper resources (both human and financial) are put in place then the process will fail. The question of '*Who pays?*' arose and how the measures will be financed. Some suggestions as to cost effective measures were proposed, such as the use of sustainable, eco-friendly products (e.g. phosphate-free detergents), and taxes/levies on non eco-friendly products.

Following an overall assessment nationally of the level of public participation in the Water Matters Public Meetings it became apparent that more effort is needed to engage people in the overall Water Framework Directive process. Participation nationally was generally low, this despite extensive media coverage of events including national and local newspaper advertisements, radio broadcasts, information leaflets and the efforts of Local Authorities, their Members and the Basin's Advisory Councils. This indicates that there is a critical lack of awareness about the Water Framework Directive amongst the general public and a lack of understanding of the consequences related to the implementation of the Directive which will directly affect every member of the public. This is perhaps not surprising given the busy lifestyles that now prevail in Ireland.

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However, we are now at a critical juncture in the implementation of the Directive. The draft River Basin Management Plans are in preparation for full Public Consultation in 2009. These Plans, developed on river basin district level, will identify the key issues affecting water quality, where these issues focus and what measures will be implemented to protect water quality. The measures will have associated costs and actions and will result in a change in the way we do things that must be borne by Ireland incorporated. In parallel the process of Strategic Environmental Assessment (SEA) will be undertaken and national issues and likely impacts identified from this process will also be discussed at the public meetings on the Draft Plans. Participation at the Plan Consultation stage is critical to its acceptance and successful implementation. The experience and lessons learned in the consultation process to date must be brought to bear in designing and successfully implementing the next consultation stage.

To improve upon public participation in advance of the RBMP consultation process the following actions are being considered or being implemented:

- A critical review of the methods by which the meetings were publicised has been undertaken. The effectiveness of the approach used to date and whether additional effort or augmentation in this area is required is being discussed. The objective is to engage the wider public to ensure they are afforded ample opportunities to comment on the draft plan. National Campaign support is needed.
- Consideration should be given to having single adverts publicising the consultation process for all RBDs run nationally, rather than each RBD running individual adverts on local media or alternatively adopt a national media campaign with combined local media campaigns.
- Concerted efforts need to be made at a national level to raise awareness about the WFD in the public domain. This is also true for the private sector, as many industries etc. will be directly affected by the plan. The draft RBMP is due to be published by the end of 2008, after which there will be a six month public consultation period before the adoption of the final Plan in the latter part of 2009. This affords little time to make the public aware of the measures that may be necessary in order to achieve the objectives of the Directive. Recommendations for a national awareness campaign are seen as critical to raising awareness of water quality issues. This campaign should be run along the lines used to raise awareness in relation to waste management “the Race Against Waste Campaign” and at a similar scale.
- A detailed timeframe for the awareness campaign to accompany the critical publication date of the draft plans and for the consultation period should be developed nationally and implemented. This campaign should be advanced urgently in order to ensure that the public have ample time to become familiar with the WFD before commenting on the draft RBMPs. The public need to be in a position where they have knowledge of the Directive in order to make meaningful contributions to the RBMP, and in turn ‘buy in’ to the changes necessary to achieve the goals of the Directive.

**Appendix 1**  
**Water Matters Consultation Form**



Western River Basin District Water Matters  
**Consultation Form**

Venue: \_\_\_\_\_ Date: \_\_\_\_\_

**1. What do you consider to be the main issues affecting the quality of water in the rivers, lakes, coastal water, groundwater and estuaries in your area?**

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**2. What are your views on the suggested actions to address these issues?**

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**3. Do you consider these actions appropriate – will they solve the problem?**

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**4. Have we missed something?**

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**Optional**

**Name (Capital letters):** \_\_\_\_\_

**Contact details (email/postal address):** \_\_\_\_\_

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**Return before 22<sup>nd</sup> December 2007 to:**  
**Pat Canney, Project Co-ordinator, Western River Basin District, Unit 2, Block 17, Liosban Industrial Estate, Tuam Rd, Galway.**  
**or email to: [info@westernrbd.ie](mailto:info@westernrbd.ie)**