

Consultation on Timetable and Work Programme for Development of Fourth Cycle River Basin Management Plan 2028 – 2033

1. Do you have any feedback on the DAERA third cycle RBMP, published on 13 June 2025?

Fermanagh and Omagh District Council (FODC) welcomes the publication and overall approach of the Third Cycle River Basin Management Plan (RBMP), particularly its focus on catchment-based management and stakeholder engagement. The Councils also welcome its integrated catchment approach and recognition of climate change. The inclusion of local catchment officers also demonstrates a commitment to on-the-ground coordination.

As a district defined by its high-quality water environment including the Erne system, Lough Melvin, internationally designated habitats, and extensive upland catchments the Council recognise the RBMP's importance for environmental protection, public health, climate resilience, and economic wellbeing.

FODC is committed to supporting strong, integrated catchment management and to ensuring that water policy aligns with Northern Ireland's climate adaptation obligations and the needs of communities.

Although the 3rd cycle is 2021–2027, the final RBMP was only published in June 2025. As the foreword of the plan acknowledges, “significant time was lost” because of institutional/political delays. The implications are that many of the measures will not be able to deliver before 2027, reducing the likelihood of achieving “good status” for water bodies by 2027 especially under increasing climate stress. Indeed, the plan itself notes that given current stagnation in waterbody status, achieving all “good status” targets by 2027 is “highly unlikely” without urgent, substantial, and holistic measures. Delays will have significant implications in building resilience (e.g., ahead of anticipated increases in extreme rainfall, flooding, or droughts).

The RBMP period is to 2027 (standard for a cycle), however climate change is a multi-decadal problem. The plan does little to set out a long-term adaptive path (e.g., building resilience by 2035, 2050). Given the delay in publication, and because the plan was largely finalised before key events (e.g., the 2023 Lough Neagh and Lough Erne algae crisis), the 3rd cycle may already be considered out of date before being fully implemented. While DAERA reprioritised some catchments (e.g., for Lough Neagh), the underlying structure and design of the programme may not be sufficiently flexible or forward-looking for future climate events.

The Council has concerns that there is insufficient ambition to meet “good status” by 2027 under climate pressures. The plan acknowledges that surface-water bodies in 2021 remain at roughly the same percentage classified as “good or better” compared

to 2015 (32% vs 31%). Given that climate change is already affecting rainfall patterns, river flows and water temperatures (which in turn affect ecological status), maintaining “business as usual” interventions seem unlikely to deliver any significant improvements. There is a high risk that climate change could not only stall progress but actively reverse it e.g., more frequent heavy rainfall causing sediment/nutrient runoff; droughts lowering river flows and increasing pollutant concentrations; warmer water reducing oxygen, harming biodiversity.

Whilst recognising that improvements in chemical and ecological status have been achieved in some water bodies over the last two cycles, the deterioration in others is concerns. This stagnation in the overall percentage of water bodies at ‘good or better’ status underscores the need for urgent, substantial, and coordinated action across all stakeholders. Achieving good ecological status in all surface waters and good chemical status in all groundwater bodies by 2027 will require a holistic approach, investment in wastewater and drainage infrastructure, proactive land management, catchment-based planning, and widespread engagement with communities, industry, and stakeholders. Without such integrated measures, the statutory objectives for water quality are unlikely to be met.

FODC is one of the local authorities within the North Western River Basin District (NWRBD). It is notable, within Table 1, that 41.9% of water bodies were classified as ‘good or better’ in 2018 compared to 46.4% in 2015. It is encouraging that the percentage of rivers with a Moderate status as increased by 10% within the same time period.

In relation to the status of lakes within the NWRBD, the Council note, with concern, that the status of Castlehume Lake, Lower Lough Erne at Kesh, Upper Lough Erne and Upper Lough MacNean all demonstrate a downward trend. These figures are reflected in the combined ecological and chemical reports in Table 5.

The figures presented in relation to Groundwater bodies within the NWRBD in 2020 reflect an improved position from 2015.

Although the proposed measures set out in the 3rd cycle RBMP address important environmental issues, they miss an opportunity to link water quality and pollution actions with planning policy. Integration with regional and local planning policy, including, the Council’s Local Development Plan could help ensure new developments include measures to reduce water impacts and enable existing developments to be improved. FODC’s guidance on Sustainable Drainage Systems (SuDS) shows how planning can support better water management. Including integration with planning would provide a clearer, long-term, and consistent approach to protecting water quality across Northern Ireland.

The current measures do not include any formal oversight for the approval, ownership, or management of SuDS proposals in Northern Ireland. DfI Rivers and NI Water should assume responsibility for both the approval and ongoing maintenance of these schemes. Funding for SuDS maintenance should rest with DfI, either directly or via NI Water, consistent with the recommendations of the SuDS Task and

Finish Group. It is also critical that any approval body is appropriately resourced to provide timely advice to planning authorities within Local Councils.

There is also a need for measures on increased education and guidance on Sustainable Drainage Systems (SuDS), particularly targeted at landowners and developers, to support better water management and ensure effective implementation of mitigation measures.

While overflowing or failing septic tanks are identified as a high-pressure source, there is currently no data quantifying the pollution they cause. The Council recommend that a comprehensive monitoring programme should be included as a specific action to better understand the scale of the issue and inform effective mitigation measures.

Other missing measures include the impact of boreholes in former mining areas, which could create new pathways for groundwater contamination.

There is also a need for clear identification of funding sources to support the effective implementation of suggested plans.

In responding to Measures 10 and 11, it is important to note that nutrient pollution and algal blooms are not limited to Lough Neagh. Lough Erne and other lakes are also under significant pressure. Wastewater upgrade investment is critical and Integrated Ecosystem Modelling should therefore be expanded beyond the current focus areas to include the Lough Erne catchments FODC welcomes schemes undertaken under the 2nd cycle Programme of Measures, such as the Source-to-Tap Interreg programme in the Erne catchment and Catchment CARE, which demonstrate the value of targeted, catchment-based interventions. A broader, region-wide approach is essential to improving water quality across Northern Ireland.

Measure 12 to 15: While FODC welcome the planned improvements, wastewater and sewage challenges extend well beyond Greater Belfast. Many towns across Northern Ireland face increasing pressures from ageing infrastructure, storm overflows and limited sewer capacity. Focusing investment mainly in Belfast risks overlooking these wider needs. A catchment-based, region-wide approach is needed to ensure all communities, including rural areas benefit from improved water quality and resilient wastewater management. FODC is home to a rich and varied natural environment, which includes many statutory designations and as a result it should be a focus for future investment.

Measure 16: FODC supports the use of sustainable drainage in new developments and welcomes the LWWP pilot SuDS schemes. FODC would also be interested in facilitating similar pilot projects and would encourage DAERA to enable this, to help deliver the benefits across rural areas in Northern Ireland.

Measure 21 and 22: While the Council support the principle of enabling sustainable wastewater solutions, NI Water's current position of not supporting private sewage infrastructure reflects concerns around long-term sustainability, environmental compliance, and maintenance. The Council encourage, a more balanced approach, which promotes nature based pilot schemes in areas where public sewer

connections are impractical. Such pilots, overseen in partnership with NI Water, could provide evidence on environmental performance and operational viability, helping to inform future policy while maintaining high standards of water quality and public protection.

Measures 26 and 27: FODC supports efforts to reduce or phase out hazardous substances, including pesticides, and welcomes a Northern Ireland disposal scheme and Public Sector Estate pilot. It is important that rural agricultural businesses are not impacted and appropriate funding is provided to reduce the cost burden on small time farmers.

In conclusion, the Plan requires stronger ambition, deeper climate and planning integration, better regulatory clarity, and a much greater role for nature-based solutions especially for rural and upland districts such as FODC.

FODC encourages DAERA to:

- accelerate delivery within this cycle where feasible, and
- design a Fourth Cycle RBMP that is fully aligned with climate science, nature restoration principles, and long-term community resilience.

The Council look forward to continued collaboration with DAERA, cross-border partners, and local stakeholders to protect and enhance the shared water environment of the FODC area for current and future generations.

2. Does the programme of consultations on page 6 adequately meet the consultation requirements for developing the fourth cycle river basin management plan?

Overall, FODC considers the proposed programme of consultations broadly adequate, but recommends additional emphasis on:

- **Greater focus on localised and catchment-specific engagement**
District-level and catchment-level workshops are essential so that local authorities and communities can provide place-based insights, particularly where unique pressures exist (e.g. upland systems, septic tank prevalence, peatland degradation).
- **Stronger inclusion of local authorities as statutory partners**
Councils deliver climate, biodiversity and planning functions that intersect with RBMP objectives. Structured local-government engagement should be embedded in the programme.
- **Improved accessibility and communication**
Engagement should be promoted through multiple formats (digital, in-person, accessible summaries) to ensure broad community participation, especially in rural areas with low digital connectivity.

3. What additional information or considerations would you like added to the consultation programme?

FODC recommends that the consultation programme for the fourth-cycle RBMP include:

- A clear timetable outlining all engagement stages, deadlines, and decision points.
- Formalised involvement of local government, including council participation in working groups and draft-measure development.
- Catchment-specific focused engagement, particularly for rural, upland and cross-border areas such as the Erne system.
- Stronger alignment with climate, planning and land-use, agriculture and biodiversity policy, ensuring integrated planning.
- Accessible and inclusive public engagement, using both online and in-person formats.
- Iterative dialogue and transparent feedback loops, showing how stakeholder input influences the plan.
- Explicit cross-border coordination where catchments span the NI–ROI boundary.
- Clarity on the structure and membership of sector working groups.
- Improved access to water-quality, modelling and climate-risk data to support informed responses.

4. How can we improve partnership working at the catchment-scale to develop a more efficient and effective process in creating the fourth cycle plan?

To develop a more efficient and effective process for creating the fourth-cycle RBMP, FODC recommends strengthening partnership working at the catchment scale through the following measures:

a. Establish Dedicated Catchment Partnerships

Create or reinforce locally-focused, multi-agency catchment groups involving:

- DAERA and NIEA
- Local councils
- NI Water
- DfI Rivers
- Loughs Agency and Waterways Ireland
- Agricultural representatives
- NGOs and community groups
- Cross-border authorities where relevant

These partnerships should meet regularly, co-design actions, and share local evidence.

b. Embed Local Government as a Core Delivery Partner

Councils hold key responsibilities in planning, climate adaptation, biodiversity and community liaison. Their early and formal involvement strengthens delivery, however this should be matched with suitable resources to allow local authorities

to support the implementation of the plan. Clear roles, expectations and communication channels should be set out from the start.

c. Strengthen Data Sharing and Joint Evidence Building

A shared evidence base is essential. DAERA should support:

- open access to water-quality and modelling data,
- localised climate-risk assessments,
- jointly developed catchment profiles, and
- standardised mapping tools.

This reduces duplication and helps partners align priorities.

d. Co-Develop Actions with Land Managers

Farmers, foresters and landowners must be involved early, not only consulted.

Catchment partnerships should work with them to:

- identify barriers,
- pilot nature-based solutions,
- encourage co-funding, and
- promote practical, place-based measures.

e. Use a Catchment Coordinator Role

A dedicated coordinator for each priority catchment would help:

- convene partners,
- track delivery,
- reduce silos between agencies, and
- support communities in participating effectively.

f. Expand Community and Cross-Border Participation

In areas such as the Erne catchment, partnership must extend to:

- community groups and volunteers,
- cross-border agencies in the Republic of Ireland,
- local anglers, recreation groups and environmental NGOs.

This reflects hydrological realities and builds public stewardship.

g. Promote Collaborative Funding and Delivery

Joint investment mechanisms particularly for nature-based solutions can unlock efficiencies.

Examples include:

- shared funding bids,
- pooling resources for pilot projects,
- aligning council, NI Water and DAERA programmes.

h. Provide Transparent Feedback and Adaptive Management

Appendix 1

Partners should clearly see how their input influences decisions. Regular progress updates, annual catchment reviews and adaptive management loops strengthen trust and accountability.

5. Do you wish for your details to be retained by the Department to contact you regarding future River Basin Management Plan consultations?

YES

About you

1 Name

Please insert detail here:

[REDACTED]

2 Are you responding on behalf of an Organisation?

No

3 Name of Organisation

Please insert detail here:

Natural Living Assets

Consultation Questions (Q1)

4 Do you have any feedback on the DAERA third cycle RBMP, published on 13 June 2025?

Yes (Please insert detail below)

Please insert detail here:

My Interest is to make a case for inclusion of Atlantic salmon development plans within the WFD process.

The methodology used to determine the Conservation target for individual rivers is based on a Bayesian analysis of best available data from index rivers and interpolated to non-index rivers data based on fluvial area. Significantly this does not take account of pollution status of rivers and the unique hydrogeomorphology (HGM) profile of individual rivers. The HGM profile of individual rivers provides many different physical habitats for juvenile salmon productivity in individual rivers. For example, bottlenecks from lack of spawning habitat, fry nursery habitat, parr nursery habitat, and migration will all ultimately impact juvenile salmon output from individual rivers. Thus, while it is critically important to protect salmon at sea it is also critically important to protect the in-river habitat structure defined by the unique hydro-geomorphological profile (HGM). Routine surveillance of rivers and electro-fishing data can be used to verify individual fry and parr densities in particular habitat profiles and used to predict an optimum juvenile density for individual rivers. Ultimately a river specific salmon conservation target could be estimated from a physical habitat survey and measures put in place to protect salmon habitat such as spawning habitat, nursery habitat and pool habitat.

The important message is that many rivers throughout NI and Ireland have had major habitat destruction with spawning, nursery and holding habitat diminished resulting in a lower productivity of smolts than would have been the case historically. The WFD programmes of measures should aim to protect any remaining salmon life cycle stage habitat and enhance the quantity and quality of juvenile salmon habitat. If salmon rivers continue to be neglected within the WFD context the potential smolt output per area of fluvial habitat will continue to decline further impacting current low survival of smolt to adult at sea.

National salmon plans are statutorily determined in parallel with scientific evidence and innovation building measures financed through the various environmental bodies and universities. Ultimately peer reviewed science is considered as a launch pad for policy development. The WFD context and subsequent fishery management plans are developed against this backdrop. It hardly needs to be said that sustainable Atlantic salmon populations require good to excellent water quality to thrive to their potential. They also require appropriate hydro – geomorphological habitats to enable survival of all the life cycle freshwater stages. Heavily modified water bodies which have had their drainage systems impaired because of damming, dredging or riparian management are required to achieve good ecological potential as opposed to good ecological status and may also support small numbers of salmon in relation to habitat HGM profile.

However, since the salmon management plans are of key community interest among local angling clubs and local community interests, a process of community engagement is a vital cog in achieving improved quantities of nursery salmon habitat Many local angling clubs are invested to improve the delivery of salmon management plans. There is thus a continuing need for angling clubs to well managed and supported by the accredited statutory aligned competent authorities and educated in catchment wide habitat issues.

The salmon management plans in NI have their own specific targets set out umbrellaed by NASCO. There is much science monitoring and science being conducted and a growing frustration that with all the studies and scientific experiments being conducted that the answer to Atlantic salmon sustainability seems to further away than ever and indeed stocks continue to decline.

The WFD framework goals (POMs) have an important influence on salmon ecology. The broad focus of WFD ensures a holistically challenging complexity to achieving a unitary goal such as returning salmon rivers to abundance. Therefore, the question we need to ask is can the WFD achieve the unitary goal of improved juvenile salmon output (smolts) by protecting the juvenile habitats defined as spawning, nursery and pools. I acknowledge that there are many vested interests functioning under the WFD umbrella and NI is constrained by its system of decision making and allocation of resources with many vested interests taking precedence over protecting salmon rivers. There is no doubt that the evolving global environment and pollution pressure on rivers is increasing because of greater resource demand (growing population and development, infrastructure connections for sewage, housing demands and high quality living.

However the biological ecological component of the WFD is critical for Atlantic salmon and depends not only on chemical water quality but also on the hydro-geomorphological (HGM) profile of individual salmon rivers to accommodate the key life stages of ova, alevins, fry, parr and migrating smolt. In essence the priority given to protect Atlantic salmon habitat in freshwater is and needs to be given greater priority than it currently has.

Consultation Questions (Q2)

5 Does the programme of consultations on page 6 adequately meet the consultation requirements for developing the fourth cycle river basin management plan?

Yes

Please insert detail here:

Consultation Questions (Q3)

6 What additional information or considerations would you like added to the consultation programme?

Please insert detail here:

Local engagement to enhance understanding of catchment wide challenges and priorities. For example it would be useful to ascertain the logic driving dredging of small rivers which often devastate salmon spawning and nursery habitats. It is often difficult to understand why drainage issues take priority over juvenile Atlantic salmon habitats in rivers.

Also agriculture becomes more efficient with its recent grazing and productivity gains does this not free up pressure on flood plains and provide an opportunity to re flood some plains and restore river meanders where these were previously removed.

Also over time a lot of knowledge has been gained on how to operate hydro schemes in a way that minimises interferences with natural river processes...not just water but also gravel and Hydro-Geomorphological (HGM) profile

Consultation Questions (Q4)

7 How can we improve partnership working at the catchment-scale to develop a more efficient and effective process in creating the fourth cycle plan?

Please insert detail here:

Sponsor consultation meetings with discussion of priorities and facilitate communication which includes local communities

Consultation Questions (Q5)

8 Do you wish for your details to be retained by the Department to contact you regarding future River Basin Management Plan consultations?

Yes

About you

1 Name

Please insert detail here:

[REDACTED]

2 Are you responding on behalf of an Organisation?

No

3 Name of Organisation

Please insert detail here:

Consultation Questions (Q1)

4 Do you have any feedback on the DAERA third cycle RBMP, published on 13 June 2025?

No

Please insert detail here:

Didn't know about it

Consultation Questions (Q2)

5 Does the programme of consultations on page 6 adequately meet the consultation requirements for developing the fourth cycle river basin management plan?

Yes

Please insert detail here:

Consultation Questions (Q3)

6 What additional information or considerations would you like added to the consultation programme?

Please insert detail here:

Make sure to reach out to the swimming groups e.g. Mermaid Social and small businesses e.g. outdoor saunas – i.e. people who use the water on a regular basis and rely on it for their wellbeing.

Consultation Questions (Q4)

7 How can we improve partnership working at the catchment-scale to develop a more efficient and effective process in creating the fourth cycle plan?

Please insert detail here:

I'm not really sure what this means, but I think that you should find more accessible ways to get input from the community and from people using the water, taking the time to go out to swimming and water-based groups and explaining in plain terms what the plan is and asking for feedback, or making simple to understand videos of the plans and asking for feedback.

I also think that Lough Neagh is not the only problem area. All our lakes do not meet european standards.

Consultation Questions (Q5)

8 Do you wish for your details to be retained by the Department to contact you regarding future River Basin Management Plan consultations?

No



Consultation on Timetable and Work Programme for Development of Fourth Cycle River Basin Management Plan 2028 - 2033

Comments by the NI Freshwater Taskforce and NI Marine Taskforce

December 2025

The NI Freshwater Task Force (FWTF) is a representative body of eNGOs working together under the Northern Ireland Environment Link (NIEL) umbrella. Current members of the FWTF include: Ulster Wildlife; RSPB; The Rivers Trust; Ulster Anglers Federation; National Trust; Woodland Trust; Wildfowl and Wetlands Trust; Friends of the Earth; Surfers Against Sewage; NI Marine Taskforce and Sustainable Water Action Network. The FWTF aims to protect and improve Northern Ireland's freshwater ecosystems through collaborative action, research, and advocacy.

The Northern Ireland Marine Taskforce (NIMTF) is a coalition of non-government environmental organisations – it includes RSPB, Ulster Wildlife, Wildfowl and Wetlands Trust, National Trust, Friends of the Earth, Marine Conservation Society, Keep Northern Ireland Beautiful, Irish Whale and Dolphin Group, Surfers Against Sewage, Shark Trust, Causeway Coast & Glens Heritage Trust and Northern Ireland Environment Link. The NIMTF has the support of approximately 100,000 local people. We are working towards healthy, productive and resilient seas for Northern Ireland.

These comments are made on behalf of Members, but some members may be providing independent comments as well. If you would like to discuss these comments further, we would be happy to do so.

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Do you have any feedback on DAERA third cycle RBMP, published on 13 June 2025?

The NI FWTF and NIMTF jointly welcomed the publication of the 3rd-cycle RBMP in June 2025, and offer our collective observations below. These points are offered to help inform the development of the 4th-cycle RBMP and to request clarification where the 3rd-cycle plan leaves open important questions about delivery, accountability and future policy direction.

We would note that in previous engagement between NIEA and the FWTF (meeting of 19th June at NIEA offices), NIEA explained that the Programme of Measures (POMs) in the 3rd RBMP were developed using a source–pathway–receptor model and that, in their view, deficiencies in water-quality improvements to date reflect failures of implementation rather than flaws in the measures themselves. The FWTF/NIMTF accept that implementation is crucial, but we underline the importance of clarity in how NIEA/DAERA will address the persistent practical barriers to delivery in development of the 4th RBMP. This is crucial if we are to begin to shift the dial in relation to water quality issues.

Below, we set out a number of specific observations relating to the 3rd RBMP, along with recommendations for how these areas could be improved to deliver a more effective 4th RBMP.

1. Waterbody-level objectives, the Pickering case and Regulation 22

In light of legal developments (including the E&W Court of Appeal decision in *Pickering Fishery Association v Secretary of State for Environment, Food & Rural Affairs* [2025]) and Regulation 22 of the WFD, we argue strongly that the RBMP should adopt highly specific, time-bound, waterbody-level environmental objectives and corresponding POMs. This has not been delivered in the 3rd RBMP. We suggest that DAERA should provide an outline timetable for moving from the current RBMP-level objectives to waterbody-specific objectives and explain whether the Department intends to revise POMs in the 3rd RBMP to reflect these legal requirements where monitoring indicates objectives are unlikely to be met. Both FWTF and NIMTF would also request a source-to-sea approach be taken to address impacts and achieve objectives across connected waterbodies.

2. Application of statutory exemptions under Regulation 17 of The Water Environment (WFD) Regulations (NI) 2017 ('the WFD')

More information is needed on the application of exemptions in the 3rd RBMP under Regulation 17. We suggest that publicly available documentation should detail where exemptions have been applied (by water body), the legal and evidential basis used to justify these statutory exemptions, and the decision-making process and documentation that supported each exemption. The application of statutory

exemptions for marine licensing need to be considered and implemented within the remainder of the 3rd RBMP and further into the 4th RBMP.

3. Funding for delivery of POMs

We note that details of the expected and secured sources of funding for delivering the POMs in the 3rd RBMP have not been provided. This might include details as to which measures are expected to be funded by central government budgets, ring-fenced funds, NI Water budget, local authority contributions, or any external sources. For measures carried through from the draft 3rd RBMP that have not yet progressed due to resource constraints, publicly available documentation should clearly identify which measures are unfunded, the scale of the shortfall, and proposed timelines or proposals to close funding gaps. This could potentially be linked to the proposed changes to Marine Licensing as part of 'Clause 16' of the developing Administrative and Financial Provisions Bill. The requirement for multi-annual, long-term financial aid, ring-fenced for addressing environmental impacts has been a long-term request from eNGOs.

4. Greater appreciation of the economic significance of water quality issues – we argue that the RBMP should include a much broader economic analysis that accounts for the impacts of water quality on local economy/ businesses.

5. Strengthening the 'have regard to' duty under Regulation 30

We suggest that DAERA should strengthen the existing 'have regard to' duty placed on public bodies under Regulation 30 of the WFD, or propose legislative changes to increase the legal weight of RBMP objectives in public-body decision-making. If no changes are planned, and in common with other recommendations made here, the Department should explain in publicly available documentation how the current duty will be made more effective in practice. Current and closed investigations into nutrient pollution by the Office for Environmental Protection (OEP) into DAERA guidance on assessing applications for ammonia emitting agricultural developments; Classification and adaptation of Special Protection Areas (Northern Ireland); Alleged failure by DAERA to publish and lay an Environmental Improvement Plan (EIP) for Northern Ireland; Investigation into Department for Infrastructure (DfI), DAERA and Utility Regulator over Belfast Lough sewage discharges. There are also a series of interventions which the OEP have carried out such as Requirements under the Climate Change Act (Northern Ireland) 2022; Inland Fisheries duties under the Fisheries Act (Northern Ireland) 1966; NIEA's duties under the Water Abstraction and Impoundment (Licensing) Regulations (NI) 2006; Publication of Environmental Improvement Plan (EIP) for Northern Ireland; Review of Nutrient Action Programme (NAP) in Northern Ireland; and the Environmental Impact Assessment (EIA) Screening in Northern Ireland. These investigations and interventions highlight that further action is required via not just DAERA, but across the NI Executive.

6. Emerging pollutants and environmental quality standards

We argue that the environmental quality standards (EQS) and environmental objectives in the 3rd RBMP do not adequately account for new and emerging pollutants that are not currently regulated under the WFD NI Regulations (e.g., novel chemicals, microplastics, substances of emerging concern). DAERA should confirm whether the 4th-cycle plan will include updated environmental quality standards (EQS) or binding objectives. If so, then the Department should provide an outline timescale and an indications of the process by which new standards will be identified, consulted on, and enacted. Not only do these need to help and address the metrics, targets and objectives of the

Environmental Improvement Plan, but also of the UK Marine Strategy (UKMS), of which we have a declining ocean health: failing 11 out of 15 indicators in 2018, to failing 13 out of 15 indicators in 2024. Under the UKMS, further work is needed to address the impacts from heavy metal pollutants in our seas.

7. **Relatedly, we argue that there could be a much greater focus on effective monitoring across the freshwater and marine environments.** We suggest that the third RBMP lacks ambition as to the potential use of new technology around remote monitoring, for example. In the development of the 4th RBMP, there could be a focus on trialling the use of this technology in areas where there is a known pollution risk.
8. **Inclusion of new and emerging policies since the development and publication of the 3rd RBMP**

We suggest that DAERA strengthen the alignment between key plans and strategies which have been developed since the publication of the 3rd RBMP. Most of these have been highlighted on Page 4 of the 4th RBMP Consultation document to further reflect additional policies and strategies which have been developed or are in the process of being developed which can benefit within the role the 4th RBMP has to play. By doing so, we can strengthen actions and SMART targets which have not been as effective due to poor governance. These strategies and plans are outlined below:

- **MPA Strategy Review (due publication in January 2026)**
- **Blue Carbon Action Plan 2025 – 2030**
- **Seabird Conservation Strategy and Action Plan (expected publication in 2026)**
- **Northern Ireland Peatland Strategy to 2040**
- **Sustainable Urban Drainage Systems (SuDS) in New Housing Developments (consulted 2025)**
- **Fisheries and Water Environment Bill and Fisheries and Water Environment Bill: Protecting the Water Environment (consulted 2025)**
- **Programme for Government 2024 – 2027**
- **Lough Neagh Report and Action Plan**
- **Shoreline Management Plans (TBA)**
- **Nature Recovery Strategy (consultation expected 2026)**

By incorporating the above strategies and plans into the 4th RBMP, we can ensure that we are tackling both the climate and biodiversity crises; it is important that as we tackle the widespread issue of water quality across NI through the 4th RBMP that we also include actions which benefit nature's recovery. For example, the MPA Strategy Review and the finalised Blue Carbon Action Plan 2025 – 2030 will focus on areas within the marine environment where existing blue carbon habitats coincide with our MPA Network which are at the receiving end of impacts to water quality, such as Carlingford Lough (Marine Conservation Zone (MCZ), Special Protection Area (SPA) and the proposed SPA Renotification (pSPA) and RAMSAR); Lough Foyle (SPA, RAMSAR and Area of Special Scientific Interest (ASSI)); Belfast Lough (SPA, Open Water SPA, Inner Belfast Lough ASSI and Outer Belfast Lough MCZ and East Coast pSPA) and Larne Lough (ASSI, SPA and RAMSAR) which as outlined have multiple designations further inshore of those specific areas. In 2024, DAERA published recommendations for Carlingford Lough MCZ, which outlines further management required for tackling water quality. There are synergies between the outlined plans and strategies, such as the Blue Carbon Action Plan recommending the creation, restoration and management of blue carbon habitats for the

ecosystem services they provide such as improving water quality (through saltmarsh, seagrass and native oyster restoration) and this should be twinned with the SuDS in New Housing Development outcome to ensure deliberate planning links which take advantage of nature-based solutions. This will provide direct opportunities for the management of impacts facing our wider waterways in reducing cumulative impacts which ultimately flow downstream.

The FWTF and NIMTF remain committed to constructive engagement as DAERA develops the 4th-cycle RBMP.

Does the programme of consultations on page 6 adequately meet the consultation requirements for developing the fourth cycle river basin management plan?

No.

See below for details.

What additional information or considerations would you like added to the consultation programme?

Although we appreciate the constraints within which we are now operating in terms of the timeline for development of the 4th RBMP, we feel that the programme of consultations outlined on page 6 of the consultation document requires clarification.

1. The programme of consultations should also include clarity on the exact steps and timelines related to co-ordination with the relevant authority in the Republic of Ireland.
2. We would also draw attention to the recommendations made in the recent report by the Independent Panel on Environmental Governance entitled "Review of Environmental Governance in NI" (2024). The report highlights a number of recommendations relating to information and data-sharing and availability, and we suggest that the RBMP process should be cognisant of these recommendations:
 - Recommendation 1 – DAERA should publish a clear map of environmental governance in Northern Ireland, identifying who is responsible for what and signposting to key points of contact.
 - Recommendation 2 – The DAERA website should offer a clear list of environmental legislation in force in Northern Ireland, including whether it has been commenced or not.
 - Recommendation 3 – A series of Memorandums of Understanding (or alternative agreements) should be established between

relevant regulators within Northern Ireland as well as cross-border when appropriate to share best practice and foster collaboration.

- Recommendation 4 – All public authorities in Northern Ireland should have a ‘duty to co-operate’ with the environmental regulator for Northern Ireland to reflect their environmental responsibilities and facilitate the exchange of information. This duty should be included in the enabling legislation introducing any new regulator, for all public authorities in Northern Ireland, in order to smooth the exchange of information.
- Recommendation 5 – DAERA should investigate the practicalities of appointing one lead department and/or lead regulator when there is overlap or shared interest in projects.

How can we improve partnership working at the catchment-scale to develop a more efficient and effective process in creating the fourth cycle plan?

To strengthen partnership working and improve the effectiveness of the fourth-cycle RBMP (both in terms of its development and creation, and its implementation) we recommend several improvements to the structure, clarity, and accessibility of catchment-scale stakeholder engagement.

First, the purpose and aims of stakeholder meetings or engagement events must be articulated more clearly for all attendees. At present, there is uncertainty about what the meetings are expected to achieve, which limits their effectiveness as mechanisms for collaboration, information-sharing, and joint planning.

Second, it is difficult to assess progress or measure the impact of these meetings because SMART targets are not consistently set within the RBMPs or Programmes of Measures (PoMs). We recommend that SMART, water-body-level targets be established. This is consistent with recommendations made by the OEP in their [report](#) on the implementation of the WFD and RBMP in NI, and with legal developments in the Court of Appeal in England and Wales (as described above). Doing so would improve transparency, enable more meaningful evaluation, and better align discussions with the requirements of the Water Framework Directive. We recognise that setting such targets may require changes to the structure and frequency of stakeholder meetings or engagement events, but consider this essential for improving outcomes.

Third, several members of the FWTF/ NIMTF have previously encountered obstacles in accessing documents associated with stakeholder engagement. Meeting papers are often uploaded to a Microsoft Teams channel that some participants cannot access. To support inclusive partnership working, these documents should be made publicly accessible, clearly organised, and user-friendly.

Fourth, there have been previous occasions during stakeholder meetings where information cannot be shared or questions cannot be answered because the appropriate officials are not present. We therefore recommend reviewing the attendance of officials to ensure meetings include staff with the relevant expertise. Relatedly, catchment-specific meetings should involve a broader range of stakeholders tailored to the needs and pressures of each catchment.

Overall, the FWTF and NIMTF believes that reinstating the previous model of catchment-level meetings would provide a structure more closely aligned with the objectives of the WFD Regulations and the UKMS. Combined with the improvements outlined above, this would strengthen collaboration, improve transparency, and support the development of a more efficient and effective fourth-cycle plan.

Do you wish for your details to be retained by the Department to contact you regarding future River Basin Management Plan consultations?

Yes