



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

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Department of
**Agriculture, Environment
and Rural Affairs**

An Roinn

**Talmhaíochta, Comhshaoil
agus Gnóthaí Tuaithe**

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Introduction

The Department of Agriculture, Environment and Rural Affairs (the Department) launched a six-month public consultation on 3 July 2025 seeking views on the proposed timetable and work programme for the development of the fourth cycle River Basin Management Plan (RBMP). This consultation also provided stakeholders with an opportunity to provide feedback on the third cycle plan.

The Department wishes to thank all stakeholders and members of the public who took the time to respond and contribute to this initial stage of the planning process.

The consultation closed on 3 January 2026, and a total of four responses were received. The responses were submitted through the following methods:

- **two** through the Citizen Space online portal.
- **two** via email/direct submission.

Responses were received from a diverse range of stakeholders, including:

- Individual respondents
- local government (Fermanagh & Omagh District Council), and
- a major environmental coalition (the NI Freshwater Taskforce and NI Marine Taskforce, representing over 12 environmental non-governmental organisations (NGOs)).

For data protection reasons, responses from individuals are treated anonymously, while comments from local authorities and representative organisations are attributed directly to them.

This document provides a summary of the main themes and issues raised by respondents, rather than a verbatim account of all comments received. It also sets out the Department's response and explains how feedback will be considered by the Department in the development of the fourth cycle RBMP.

A wide range of statutory consultees and relevant stakeholders were notified of the launch of the consultation directly via email and provided with the consultation document and the proposed fourth cycle work programme. Throughout the six-month

consultation period, the consultation was publicised online via the Department's official channels and social media to ensure maximum visibility for water users and community groups.

Background

River Basin Management Planning is the primary mechanism for implementing the requirements of the Water Environment (Water Framework Directive) Regulations (Northern Ireland) 2017. These regulations place a legal obligation on the Department to manage the water environment through an integrated approach, striving to ensure that all inland and coastal waters achieve at least 'Good' ecological status by 2033.

The River Basin Management Plans are subject to review and update every six years. Northern Ireland is currently implementing the third cycle and developing the fourth cycle:

- First Cycle: 2009–2015
- Second Cycle: 2015–2021
- Third Cycle: 2021–2027 (published 13 June 2025 following Executive approval)
- Fourth Cycle: 2028–2033 (currently in development)

The publication of the third cycle RBMP was delayed due to a range of factors. In order to support the timely and effective delivery of the fourth cycle, the Department initiated a consultation on the Timetable and Work Programme, as required under the 2017 Regulations.

Under the 2017 Regulations, the Department is required to consult the public on the components of the plan at least three years before the period to which the plan relates begins. This initial "Working Together" phase is essential for establishing how the Department will collaborate with stakeholders, local authorities, and the public to identify Significant Water Management Issues (SWMI) and develop effective measures to protect our water environment.

The feedback gathered during the fourth cycle consultations will shape the milestones for the next two years. The consultation on the draft fourth cycle RBMP will issue by 22 December 2026 for a six month period.

Overview of Responses

Analysis of the consultation responses received identified several recurring themes and specific priorities from the four stakeholders (NI Freshwater/Marine Taskforce, Fermanagh & Omagh District Council, and two individual respondents).

General Themes Across Responses

1. **Demand for Localised, Site-Specific Action:** There is a strong consensus that the fourth cycle must move away from high-level, generic objectives toward "site-specific" or "waterbody-level" measures. This is driven both by environmental needs (e.g., specific salmon habitats) and legal precedents (the Pickering Case).
2. **Accessibility and Transparency:** Multiple respondents highlighted that technical documents are often too complex or difficult to access. There is a call for "plain English" summaries, educational videos, and a move away from restricted document-sharing platforms (like private MS Teams channels).
3. **Enhanced Stakeholder Engagement:** Respondents want engagement to start much earlier—particularly with landowners and recreational water users (swimmers, anglers, and small water-based businesses) - rather than waiting for a draft plan to be published.
4. **Catchment-Based Management:** There is strong support for returning to a model of localised catchment meetings and the potential creation of Catchment Coordinator roles to bridge the gap between government agencies and local communities.

Responses to Consultation Questions

Question 1: Do you have feedback on the Third Cycle RBMP (Published 13 June 2025)

General Awareness and Timeliness:

- **Awareness:** One individual respondent was unaware the third cycle plan had been published.
- **Delays:** Fermanagh & Omagh District Council (FODC) welcomed the publication but noted that the significant delays in the publication of the third cycle plan have increased the risk of missing the 2027 and 2033 targets.

Strategic and Legal Observations

- **Waterbody-Level Specificity:** The NI Freshwater Taskforce (FWTF) and NI Marine Taskforce (NIMTF) argued that the third cycle failed to deliver highly specific, time-bound objectives at a waterbody level. Citing the Pickering Case (2025), they emphasised that generic high-level objectives are no longer sufficient to meet legal requirements.
- **Statutory Exemptions:** Some respondents requested greater transparency regarding the application of exemptions under Regulation 17, including the specific legal and evidential basis used to justify them for individual water bodies.
- **Policy Integration:** FODC noted a missed opportunity to link water quality actions with local planning policies, such as Sustainable Drainage Systems (SuDS) and Local Development Plans, to ensure new developments do not further impact water status.

Funding and Economic Accountability

- **Funding Transparency:** The FWTF/NIMTF pointed out a lack of detail regarding secured versus expected funding for the Programme of Measures (POMs). They requested that future documentation clearly identify unfunded measures and the scale of resource shortfalls.

- **Economic Analysis:** There were calls for a broader economic analysis that accounts for the direct impact of water quality on local businesses and the wider economy.

Technical and Ecological Concerns

- **Fisheries and Habitat:** One respondent made a case for the inclusion of Atlantic salmon development plans. They criticised the current Bayesian methodology for determining conservation targets, stating it fails to account for the unique Hydro-geomorphology (HGM) profile and pollution status of individual rivers.
- **Emerging Pollutants:** Environmental groups argued that current standards do not adequately address emerging pollutants, such as novel chemicals and microplastics, which are not yet regulated under the WFD.
- **Monitoring Technology:** Respondents suggested the third plan lacked ambition regarding the use of new technology, such as remote monitoring, particularly in high-risk pollution areas.

Localised Deterioration: FODC expressed concern over downward trends in specific water bodies, including Castlehume Lake and Upper Lough Erne, despite some improvements elsewhere.

The Department's Response:

The Department is grateful for the comprehensive and detailed feedback provided regarding the third cycle RBMP. We recognise the frustration expressed by stakeholders concerning the delayed publication of the Third Cycle plan and the resulting concerns that the plan was prepared in advance of the blue-green algae crisis.

While the Department remains committed to the statutory objective of achieving 'Good' status for all water bodies by 2033, we acknowledge that achieving 2027 targets is now highly challenging due to delays.

In response to the specific points raised, the Department intends to take the following actions:

- The Department notes the request for greater clarity regarding the application of exemptions under Regulation 17. Regulation 17 is not used in Northern Ireland, however if it is incorporated into the fourth cycle RBMP, we will review and implement it as appropriate with the aim of providing greater clarity.
- The Department notes the comments on funding and economic analysis. The Department will take into consideration the cost and affordability of measures that are proposed for the fourth cycle RBMP.
- The detailed feedback concerning Atlantic salmon development plans and the unique Hydro-geomorphological (HGM) profiles of individual rivers has been noted. The Department holds policy responsibility for managing Northern Ireland's inland fisheries and implementing international agreements to restore these Atlantic Salmon stocks. To ensure evidence-based management, a Scientific Committee on Salmon provides annual advice on the health of individual rivers, determining which can support limited harvesting and which require strict protection to prevent local extinctions. In March 2025, the Department issued a Policy Position Statement on - Management Policy of Salmon and Sea Trout for 2025 - [Policy Position Statement on - Management Policy of Salmon and Sea Trout for 2025](#)
- The Department is developing the fourth cycle plan to be "forward-looking" and to provide a long-term adaptive path for climate resilience. Sustainable Drainage Systems will be included in considerations.

Question 2: Does the programme of consultations on page 6 adequately meet the consultation requirements for developing the fourth cycle RBMP

Stakeholder Comments:

- **Legal Compliance:** The NI Freshwater Taskforce (FWTF) and NI Marine Taskforce (NIMTF) submitted a detailed response, stating that the programme is not currently adequate. They argued that following the Pickering Case (2025), the Department is legally required under Regulation 22 to develop waterbody-level, site-specific environmental objectives rather than high-level generic ones. They expressed concern that the proposed timetable does not explicitly allow for the intensive data-sharing and technical collaboration required to meet this standard.
- **Targeted Engagement:** Fermanagh & Omagh District Council (FODC) noted that while the timetable is standard, the delays in the third cycle have "compressed" the time available action. They cautioned that the timetable must remain flexible enough to incorporate findings from ongoing water quality crises, such as those in Lough Neagh and Lough Erne.
- Other respondents agreed that the general six-month consultation periods for the Significant Water Management Issues (SWMI) and Draft fourth Cycle Plan stages are appropriate, provided they are accompanied by better outreach.

The Department's Response: The Department intends to use the Significant Water Management Issues (SWMI) public consultation phase (Dec 2025–June 2026) which opened on 18 December 2025. [Open Consultation - Significant Water Management Issues](#). The outworkings of this work will inform development of the fourth Cycle Plan.

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

Stakeholder Comments:

- **Ecological Specificity (Salmon & HGM):** One respondent argued for the specific inclusion of Atlantic salmon development plans, highlighting that the current monitoring methodology fails to account for the unique Hydro-Geomorphological (HGM) profiles of individual rivers, which determine spawning success and suggesting that the work programme investigate the "logic driving dredging" of small rivers, which they claimed often devastates juvenile salmon habitats.
- **Nature-Based Solutions and Re-flooding:** One respondent suggested that as agricultural efficiency increases, the Department should identify opportunities within the work programme to re-flood floodplains and restore river meanders that were previously removed.
- **Targeted Recreational Engagement:** One respondent recommended reaching out to the "blue space" community, such as swimming groups and small businesses that rely directly on high water quality for their health and livelihood.
- **Policy Alignment (SuDS & Planning):** FODC requested that the work programme include a clearer focus on aligning RBMP objectives with Local Development Plans and the Climate Action Plan. They highlighted a need for stronger statutory requirements for Sustainable Drainage Systems (SuDS) in all new developments to prevent further waterbody deterioration.

The Department's Response: The Department welcomes these suggestions and will consider them in the development of the fourth cycle work programme. The draft of which will be consulted on in December 2026. The Department is reviewing its stakeholder engagement approach, including consideration of a broader range of interest groups. The Department will continue to work closely with the Department for Infrastructure (DfI) and public bodies with the aim that the RBMP measures are reflected in planning policy and SuDS implementation. The Department will also consider exploring opportunities for nature-based solutions, such as river restoration and floodplain management, as part of the wider catchment-based approach.

Question 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?

Stakeholder Comments:

- **Accessibility:** A request was made for "plain English" versions of technical documents and the use of educational videos to explain plans to the public.
- **Coordination Roles:** FODC suggested creating Catchment Coordinator roles to reduce silos between agencies and involve landowners earlier in the design of nature-based solutions.
- **Meeting Structure:** FWTF and NIMTF recommended reinstating catchment-level meetings and moving document sharing away from restricted platforms (like MS Teams) to a publicly accessible portal to ensure transparency.

The Department's Response: The Department recognises the importance of effective partnership working. As part of the development of the fourth cycle RBMP, the Department will review engagement approaches and communication practices, with the aim of supporting constructive stakeholder involvement and improving accessibility where possible.

Next Steps

In response to the feedback received from the local councils, environmental, and private sectors, the Department recognises that while the proposed timetable is broadly accepted, there is a clear demand for greater and enhanced local engagement in the development of the fourth cycle plan.

The Timetable and Work Programme will serve as the roadmap for the next two years. The next phase in this process will be the responses of the consultation on Significant Water Management Issues (SWMI) Report 2025, scheduled to close on 18 June 2026. This consultation provides a further opportunity for stakeholders to have their say that will form the basis of the fourth cycle RBMP.

The Department intends to review stakeholder engagement events for the fourth cycle RBMP, with a view to bringing together representatives from the environmental, agricultural, local government, and recreational sectors to co-design the fourth cycle RBMP. This will allow for a deeper dive into the data gathered so far, ensuring that the strategic objectives of the fourth cycle plan are both ambitious and achievable. This collaborative evidence-base will be instrumental in defining the specific measures that will protect and improve our water environment through to 2033.

Following the SWMI Report consultation, the Department will produce a draft fourth cycle RBMP which will be published for consultation in 2026 for a six-month period asking the public to consider the proposed identified issues, measures and delivery plan. A critical component of this plan will be the Programme of Measures (POMs)—the specific actions designed to address identified pressures and reduce their impact on water bodies. To ensure these measures effectively drive behavioural change and environmental improvement, the Department intends to base the fourth cycle POMs on four strategic pillars:

- Education
- Incentivisation and Innovation
- Regulation

- Enforcement

Furthermore, the Department is committed to ensuring that these measures are SMART (Specific, Measurable, Achievable, Relevant, and Time-bound). This rigorous approach will provide a transparent and accountable framework for delivery. The draft fourth cycle RBMP will be published for consultation in 2026 for a six-month period, asking the public to consider these proposed issues, measures, and the overall delivery plan. Following consideration of consultation responses, the final fourth cycle RBMP will be submitted for Executive approval, with the aim to publish in December 2027.

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