



ICS

Innovation &
Consultancy Services

Bathing Waters Review Workshop Factual Report

18 November 2025

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1. Introduction

The Department of Agriculture, Environment and Rural Affairs (DAERA) commissioned Innovation and Consultancy Services (ICS) to deliver a workshop on the ongoing work on the Bathing Waters Review with key stakeholders committed to in the Environmental Improvement Programme for Northern Ireland. The review also gives an opportunity to explore some of the recommendations of the **Office of Environmental Protection Report of Bathing Water Regulations**.

A one-day workshop was held at Stormont Pavilion, on Tuesday 18 November 2025 and brought together a diverse range of stakeholders, including:

- Department Officials,
- Bathing Water Operators (BWO),
- Non-Bathing Water Operators (NBWO), and
- Open water users including sports and swimming groups.

The workshop focussed on gathering views from attendees on the following areas:

1. Length of the bathing season,
2. Risk-based approach (RBA) to sampling,
3. Criteria for identifying bathing waters and the definition of bathers,
4. The use of candidate sites, and
5. Identifying any other recommendations which had not been included in the remit of the exercises previously taken forward on the day.

Findings from each of the exercises will be discussed in the next section.

A full list of attendee organisations can be found in **Appendix I**.

This report provides a factual account of the 1-day workshop and summarises all the key information gained.

Table 1: Response in order of popularity to the question what bathing waters mean to you?

Ref	Single word response	Number of responses
1	Swimming	8
2	Clean	6
3	Summer	6
4	Fun	4
5	Health	4
6	Safe	4
7	Leisure	4
8	Swim	3
9	Accessible	2
10	Beaches	2
11	Cold	2
12	Exercise	2
13	Public	2
14	Recreation	2
15	Sport	2

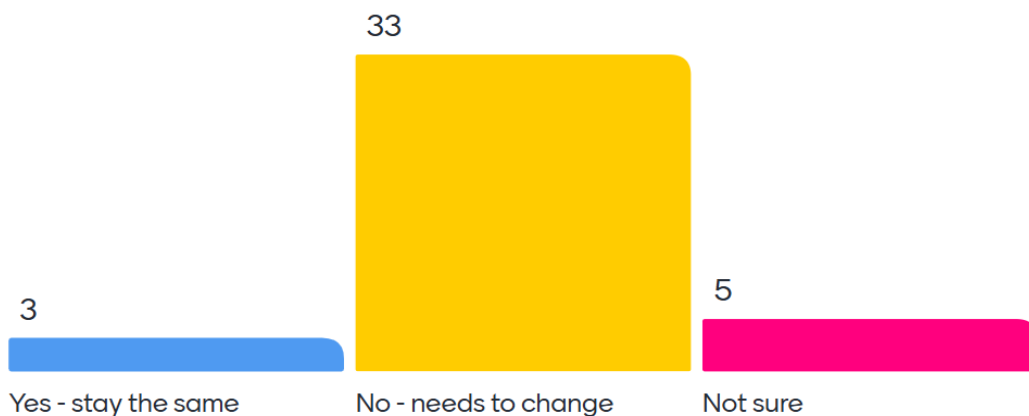
2.2 Exercise 1: Length of Bathing Waters Season

Following a short introduction from a DAERA official, who provided information on the current length of the bathing water season, attendees were asked to respond to the following questions via the online tool:

‘The bathing season is 01 June to 15 September. In your opinion, should the season stay the same, change or are you not sure?’

There was a total of 41 responses. **Figure 2** shows the majority of attendees selected that there was a need for the season to change.

Figure 2: In your opinion, should the bathing season stay the same, change or are you not sure?

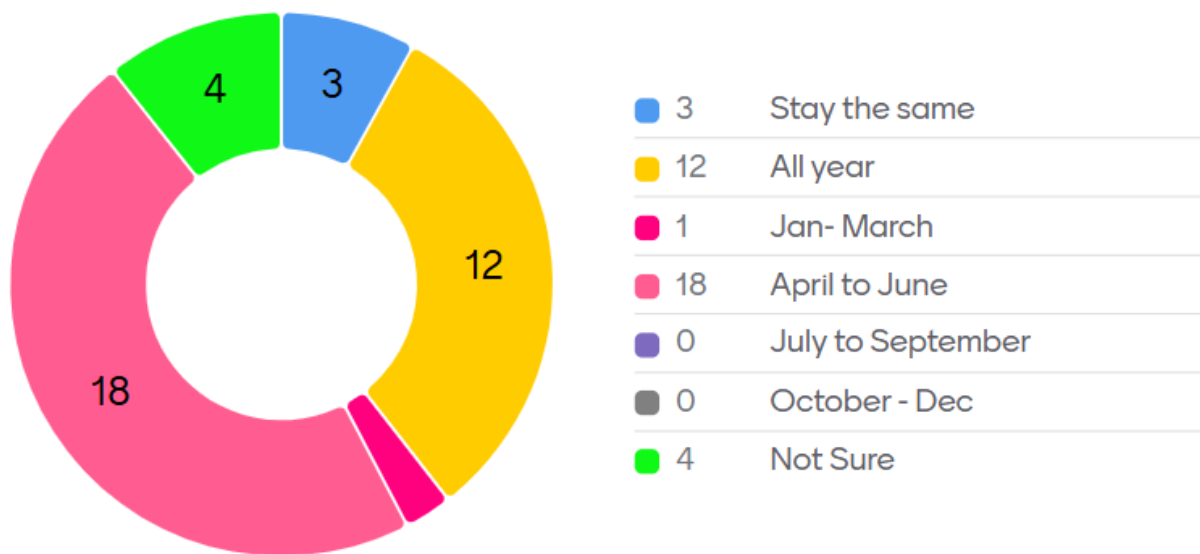


The next question posed was:

'When should the bathing season open?'

There were a total of 38 responses for this answer. **Figure 3** shows that the most popular option was April to June, followed by all year round.

Figure 3: When should the bathing season open?

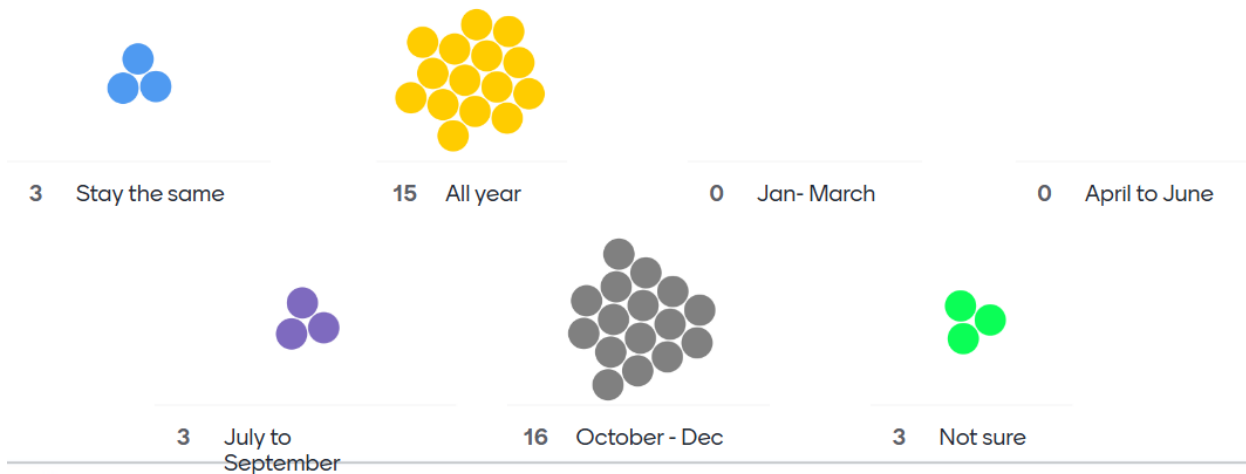


The final question posed for this session was:

'When should the bathing season close?'

There was a total of 40 responses for this question, with **Figure 4** showing the most popular answer to be October to December, followed by all year round.

Figure 4: When should the bathing season close?



Attendees were then asked to discuss and contribute their own views on the bathing season opening and closing dates. Individual views were captured on templates so to ensure all views were represented.

Attendees were seated in mixed groups, representing different organisations, so to allow for a well-balanced exchange of feedback. and a number of key recurring themes for each question were discussed.

The most popular responses from both Mentimeter and desktop feedback were for a change to either Easter/April to October or to all year round for the length of the bathing season. There were three rationales provided for **not sure** and two rationales for the bathing season to **stay the same**. **Table 2** below shows the list of options and the rationale provided for each option.

Table 2: Options and associated rationale for selection of each option on the length of the bathing season

Option	Frequency of Mention	Rationale
All Year Round (AYR)	13	<ul style="list-style-type: none"> • There is all year-round swimming (Health & Wellbeing) • AYR – but better comms on offers • Other users – year-round too • Encouraging year round and therefore water quality improvements driver • Links to risk and long-term strategic change. Not everywhere all the time • With caveats. Resource implications for BWO • Tailor testing to usage and risk • Not sharing data in the right way • Do targeted sites to better managed resources. • Folks could travel. • Clear, not confusing • People use beach/walk year-round anyway.
April/Easter–October	7	<ul style="list-style-type: none"> • Water usage + temperature

Option	Frequency of Mention	Rationale
		<ul style="list-style-type: none"> • Caravan season • Add a month either side • Most amount of users • Easter holidays. Spreading period 01 February to 15 October • More tourism at these times • NIW costs better managed • Skiers etc end up in water, break boarding. • All activity providers operating doesn't need to be every bathing site.
AYR/Not Sure	1	<ul style="list-style-type: none"> • Behalf of users – general consensus all year. Lack of information/understanding of AYR.
April to September	2	<ul style="list-style-type: none"> • Historical use. Triathlon training. Seasonal staff, caravan opening. • Precedent management of parks number using for recreation. • Resource students become available to provide additional staff.
Stay the Same	3	<ul style="list-style-type: none"> • Resourcing. Need more resources to monitor sites. • Impacts on budgets – NIW • Assets designed to meet 3 spills per bathing season
March to November	1	<ul style="list-style-type: none"> • Taking account of people who have the correct gear for colder temperatures – paddle boarders etc.
Not sure	4	<ul style="list-style-type: none"> • More evidence needed • Evidence based – data required. Any benefits to extending? • Don't know enough about it. • Don't know definition of bathing • Criteria for setting season in first place – risks and parameters.
Other	2	<ul style="list-style-type: none"> • Extend season to shoulder season – St Patricks to Halloween. • Potential all year testing of selective sites – all population within 30 minutes of a tested site. • More nuanced than mentimeter questions of open and closed. Compromises and prioritised sites for all year.
April/June to October/December	1	<ul style="list-style-type: none"> • Balance with resources and investment • Fewer users in colder months.

2.3 Exercise 2: Risk-based approach (RBA) to monitoring bathing water sampling

Following an introduction on the current process for monitoring bathing water sampling, each table was asked to discuss their views on possible changes to the current sampling and monitoring routine and to suggest the impact that this could have on public messaging.

Table 3 provides the feedback gathered for sampling, monitoring and combined insights for the impact and messaging for both sampling and monitoring. It is important to acknowledge that all groups did not provide insights on monitoring and sampling approaches.

Table 3: Feedback on sampling, monitoring and impact on messaging from Exercise 2

Content	Responses
Sampling	<ul style="list-style-type: none"> • Could be reduced gradually at consistent sites • Could be more beneficial to help extend season/site • Public may not want site reduced - historic legacy • Viable options – targeted with some more, some less and historic data utilised • Yes – viable option in sites with excellent quality • Focus on the underperforming sites • Risk-Based Approach • Less sampling is a viable option • Less sampling could be viable. RBA is viable • Use science advice • Rapid tests could be used by public to supplement • Risk-based approach e.g. higher risk, more samples • Need better picture/data of when bathers are e.g. Newcastle bathing is not at the sample point • Rea's wood – poor with limit re-sampling no need to sample if visible BGA? • Potentially more effective resource through technical/risk-based sampling
Monitoring	<ul style="list-style-type: none"> • Look at external factors: <ul style="list-style-type: none"> ◦ Temp users / historic data ◦ Land use / infrastructure – Waste Water Treatment (WWT) / Combined Sewage Overflow (CSO) /Event Duration Monitors (EDM) • Linking with River Basin management • Possible different testing at different times of the year/historic data adopts • Citizen Science approach to help stretch resources • Blue Green (BG) Algae • Frequency should increase out of season • Sewage outfall monitoring can be used too • Swim NI app is also a great way to add info to public domain • Less monitoring for risk-based sampling • Impact on statistical data for short-term and long-term trends
Impact and Messaging	<ul style="list-style-type: none"> • Be communicated positively • Testing is still appropriate • Benefit to user highlighted • Pre-education - more info explaining why it's happening this way • Continual Comms – the right message, the right way and social media

Content	Responses
	<ul style="list-style-type: none"> • Community engagement would be key – understanding • Engage with community prior to implementation • Good comms strategy • Community engagement – stretch resources • Source to sea Messaging • Assessment of the users at each site • Standardised messaging – delivery • Additional costs of BG Algae • Educational risks – change in seasons, visibility of algae and no algae present but toxins present • Need to educate the public if considering RBA • Clear messages • Don't flood people with too much info • Use consultation to find out what info public want • Activity providers need to assess water quality • How do we explain clearly to the public reason for less sampling • Clear communication requirements – priority • Water Quality (WQ) importance needs to be seen as DAERA, Government • Lack/reduced data in risk-based sampling may affect messaging/evidence to support policy development and comms. • Bathing Water dashboard expands information and publicises link to central messaging hub • Multi-media approach to target more • Reactive/proactive prep for monitoring comms

Table 3 summarises the key findings from the group discussions, highlighting a strong emphasis on incorporating historical data into both sampling and monitoring decisions. The groups consistently recognised the importance of using past trends and site-specific information to inform future approaches.

Resource efficiency emerged as a shared priority, with innovative solutions such as citizen science, rapid testing, and seasonal flexibility identified as practical ways to optimise capacity without compromising standards.

2.4 Exercise 3: Part A - What should the criteria be for the identification of bathing water?

A DAERA official shared the Department's current criteria used for identifying bathing waters. The groups were asked to consider what could stay the same and why; and then what potentially could be different and why. Each group was also given the opportunity to discuss and collect their thoughts on post it notes. There was evidence collected in response to why and what needs to be **different**. Feedback is captured in **Table 4**.

Table 4: Responses to what needs to be different for the identification of bathing waters

Content	Responses
Data	<ul style="list-style-type: none"> • Regular event data – e.g. dippers group • Collective application data • Cumulative numbers rather than one off • Review of users in existing bathing waters – for baseline numbers for reference • No number vs frequency e.g. uses at a site • Can we factor in historical use? i.e. places that were once used that had poor water quality
Evidence	<ul style="list-style-type: none"> • How are sites numbers sampled – members of the public could submit photos of usage. – usage evidence • Photographic support • Usage and evidence swim group information • On site surveys via Quick Response (QR) code
Access	<ul style="list-style-type: none"> • Flexibility on number of users to allow checking in other things (in consultation with BWO) • User access – should be cleared • What facilities or public access is available – BWO management
Timing	<ul style="list-style-type: none"> • Counting should be at high tide • Sampling should be on club days/weekends • Survey outside office hours – e.g. 6am to 6pm
Users	<ul style="list-style-type: none"> • Better definition of users • Site users' definition extended • Usage assessment change – <ul style="list-style-type: none"> ○ Regular users ○ Seasonal users (annual average)
Site Specific	<ul style="list-style-type: none"> • Appropriateness of sites ahead of safety • Site right next to existing sites could be ruled out • Can we consider site use for amateur quality assurance ever “access points” and facilities
Risk	<ul style="list-style-type: none"> • Risk assessment to impact assessment including environmental impact from increased use or intrusion for residents. • BWO/private companies public health risks

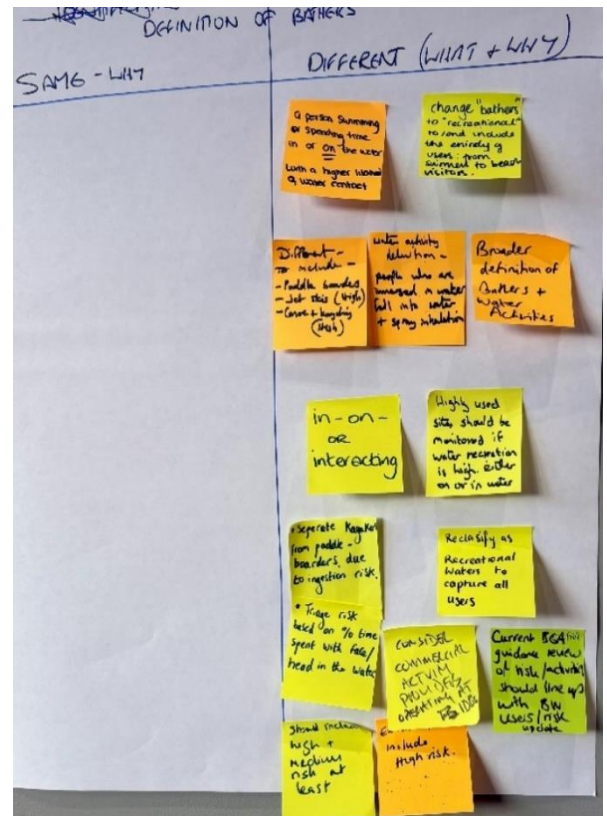
2.5 Exercise 3: Part B - views on the definition of bathers?

The second part of the exercise was to collect views on who the Regulations should apply to and what should stay the same and what should be different. In advance of this exercise commencing a DAERA official shared with the group the current definition of ‘Bathers’ as ***‘a person swimming or spending time in the water’***. They then went on to provide a context for the current definition advising that the probability of ingestion of water is greater for whole-body contact activities and therefore are categorised as high risk. Inhalation can be important where there is a significant

amount of spray, such as in waterskiing and jet-skiing. Activities such as sailing, fishing, or wading usually involve incidental water contact and minimal water ingestion and are deemed low risk. The feedback is shown in **Figure 5**. There were no insights provided for the definition to stay the same.

Figure 5: Definition of bathers' feedback

- A person swimming or spending time **in or on** the water with a higher likelihood of water contact
- Change and reclassify 'bathers' to **'recreational users'** to/and include the entirety of users: from swimmers to beach visitors to capture all uses
- Consider commercial activity providers – operating at non-bathing water sites
- To include paddle boards, jet skis (high) canoe and kayaking (high)
- **Water activity definition** – people who **immersed** in water fell into water and spray inhalation
- Broader definition of bathers and water activities
- Highly used sites should be monitored if water recreation is high either on or in water
- Separate kayakers from paddle boarders due to ingestion risk
- Triage risk based on **percentage time spent** with face/head in water
- Current Blue Green Algae (BGA) and Public Health Agency (PHA) guidance review or risk/activity should line up with Bathing Water (BW) users/risk update
- Should include high and medium risk at least
- Extend to include high risk



2.6 Exercise 4: What approach should be taken to the use of candidate sites to test water quality?

A DAERA official provided an overview of the previous approach of using candidate sites to test water quality of potential future bathing sites before making them official. Each table was asked to consider the following and provide insights as a group: –

- The benefits of the candidate site approach
- The drawbacks of the candidate site approach
- What should the criteria for approach to candidate sites be?

The responses, captured in **Table 5** below, showed a balance between the potential advantages of increased flexibility and awareness, and the challenges associated with managing expectations,

resource implications, and long-term planning. The criteria proposed aim to ensure a risk-based, evidence-led approach that supports proactive water quality management while considering environmental and biodiversity factors.

Table 5: Responses to the approach that should be taken to the use of candidate sites to test water quality

Content	Responses
Benefits	<ul style="list-style-type: none"> • Raises awareness of more sites of water quality status • Gives clear picture for opportunity to improve • Identify issues Long-term trends of usage – opportunity to improve water quality, independent evidence, social benefits • Provides an option if there is no executive again • Benefit – avoids black and white cut off • Benefit – more flexibility, no budget and shorter commitments • Benefit – enable assessment prior to full identification (ID) as designated bathing water • Benefit – enables commitment and build up testing, knowledge & less time commitment • Good – cost effective – better idea of site quality – raising awareness
Neutral	<ul style="list-style-type: none"> • Difference seems to be in name – ‘candidate’ or ‘designated’ but all requirements followed
Drawbacks	<ul style="list-style-type: none"> • Disadvantage – managing expectations – resource implications • What happens after if poor quality, if dropped as BW could be incorporated into river basin management plan • Too polluted to protect! We need to stop polluting sites before texting - which then shows it's too polluted to be able to protect – and therefore stop polluting.....the system is wrong • Disbenefit – some expectations may not be fulfilled • Difficult to drop a site once identified as candidate • Uncertainty for financial planning • What is the timescale for Northern Ireland Water (NIW) to increase standards if candidate site
Criteria for approach to candidate sites – anything different?	<ul style="list-style-type: none"> • General Criteria Risk-based approach to sampling – and review sample site annually • Better picture of water quality – proactive • Recommend 4 years as a candidate site then reviewed before designation or not • Include environmental & biodiversity into criteria standards • Based on 4-year period • Could be reduced for sampling <ul style="list-style-type: none"> ○ Good 2 years ○ Poor 4 years some sites are sufficient • Mainly considering – coast – needs to consider rivers/loughs – blue flag development • Does bathing water operator notify do not bathe after 3 years of failing? • Change criteria to the water quality and NOT having to pass, so it can become a bathing water to get adequate protection • Once a site reaches candidate status it will be very difficult for the public to accept removal from the list

Content	Responses
	<ul style="list-style-type: none"> • Very difficult to create as one size fits all procedure for assessing candidate sites that regularly fail.

Overall, the feedback highlighted strong support for a structured, phased approach to candidate site designation, underpinned by transparent criteria and clear communication. While the benefits of raising awareness and enabling gradual commitment were widely recognised, concerns around resource demands, financial uncertainty, and public expectations underscore the need for robust governance and engagement strategies.

2.7 Exercise 5: Consider alternative recommendations which have not been included in the remit of the exercises

For the final exercise, attendees were asked to provide any other recommendations that they felt should be considered as part of a new bathing waters policy, that had not been covered throughout the earlier exercises using Mentimeter. **Table 6** below sets out the recommendations and associated themes. Attendees provided 40 comments with each stakeholder having the opportunity to provide multiple answers. These comments were grouped into themes. Recommendations reflected a strong desire for clearer definitions, improved transparency, and sustainable resource allocation. They also emphasised the importance of leveraging technology, expanding monitoring capabilities, and fostering collaboration with communities to enhance water quality management.

Table 6: Recommendations reported by theme

Category	Recommendations made including questions raised
Criteria and Standards	<ul style="list-style-type: none"> • Should we consider a wider criterion to consider benefits to the locality? For example, the blue flag beach criteria • Clearer criteria/definitions • Broader definitions throughout to remove ambiguity or "wriggle room" • A limit on how many sites can be a bathing water and a limit on candidate sites to use the resources in a sustainable way
Monitoring and Data	<ul style="list-style-type: none"> • Consider new Event Duration Monitors (EDM) data sharing in conjunction with increased testing? • Greater incorporation of Event Duration Monitoring across Northern Ireland to increase available data for use with the public. This will require long-term investment to ensure adequate monitoring • Live sewage dashboard similar to the model in England where event duration monitors are broadcast live or events recorded within last 48 hrs. Allows users to make decision https://www.sewagemap.co.uk/ • Can we also consider expanding what we test for? For example, harmful chemicals present in water bodies. • Extend modelling • Public education around blue spaces

Category	Recommendations made including questions raised
	<ul style="list-style-type: none"> • In situ monitoring and live and accessible data • Surrogate, innovative quick tests to augment risk-based sampling • Investigate new ways of testing
Community Engagement and Citizen Science	<ul style="list-style-type: none"> • Grow the interaction between The Bathing Water team and the community of bathers • Citizen science projects - using communities to test water quality and creating a checklist communities can follow to submit their bathing waters as potential candidate sites • Importance of the use of citizen science projects to support monitoring programmes and empowering society to get more involved and have ownership. DAERA would need to outline requirements for data • Connecting with and empowering local water users / community to feel involved. Perhaps using them as a resource for sampling / monitoring. • Establishment of a proactive working group including reps from both inland and coastal water areas
Communication and Education	<ul style="list-style-type: none"> • Better communication to and education of the public • Effectiveness and impact tourism industry etc • Communication - contact with water sports bodies, fishing groups • More stakeholder engagement with the implementation process • Better education to the public to increase effectiveness • Informing policy on nutrient policy • Cohesive and effective communication for all of this is vital considering all the different users and their requirements. Public perception needs to change! • Better education around the Bathing Water programme • Feedback from public • Need for high level of clarity re what the alerts do and don't to temper people's expectations • Better communication to the public that open water carries inherent risk compared to managed waters like a pool • How to educate the public and get the information to the public • Better and faster communication to users and more focus on education
Policy and Governance	<ul style="list-style-type: none"> • Feedback and audit • Consideration on how spills from wastewater assets will be regulated, in event of extension to bathing season. Currently assets are designed and upgraded with storage to meet 3 spills/ bathing season • Make other user groups aware of the different criteria in testing for coastal waters and inland waters • Better beaches forum, what is it and does it lead to an exclusion of freshwater locations? • Are we looking at best practice elsewhere?
Other	<ul style="list-style-type: none"> • No further recommendations • N/A • Effect and impact on tourism industry. Social and economic benefit

Collectively, these recommendations highlight the need for a holistic approach that integrates robust criteria, advanced monitoring systems, and proactive engagement strategies. Clear and

consistent communication, coupled with education initiatives, will be essential to manage expectations and build public confidence.

2.8 Closing Exercise

A closing Mentimeter exercise repeated the question asked at the start of the workshop (Figure 1) asking:

‘Having considered and contributed to the workshop today please describe in single words what bathing waters means to you?’

Figure 6: Word Cloud on the results of the answer from describe in single words what bathing waters mean to you



The words that are larger, in **Figure 6**, are common words where more than one person has provided an answer. **Table 7** provides the top five answers in order of most common responses for the first exercise and compares to the last exercise. All other single word responses (not listed in Table 7) returned a single response. The word cloud at the end provided a more diverse response and illustrates that attendees are considering the complexities and the health and well-being of bathing waters.

Table 7: Response in order of popularity to the question of what bathing waters mean to you after the workshop

Ref	Single word response at start	Number of responses at start	Single word response at end	Number of responses at end
1	Swimming	8	Complex	5
2	Clean	6	Fun	5
3	Summer	6	Health	3
4	Fun	4	Escape	2
5	Health	4	Freedom	2

At the **start of the workshop**, responses were dominated by practical and activity-related terms such as *swimming* (8 mentions), *clean* (6), and *summer* (6). These suggest an initial focus on the physical experience and environmental quality.

However, at the **end of the workshop**, responses shifted towards more abstract and experiential concepts like *complex* (5), *fun* (5), and *health* (3). This indicates a move from tangible attributes to broader lifestyle and wellbeing considerations.

The presence of *fun* in both lists (start and end) shows consistency in valuing enjoyment, while terms like *escape* and *freedom* emerging later suggest growing emphasis on emotional and psychological benefits.

3. Conclusion and Next Steps

3.1 Conclusion

The Bathing Waters Review workshop successfully brought together a diverse group of stakeholders, including DAERA officials, bathing water operators, water sports representatives, and other water users.

The collaborative discussions provided valuable insights into key issues such as the length of the bathing season, risk-based monitoring approaches, criteria for identifying bathing waters, and the role of candidate sites.

The engagement highlighted strong interest in improving water quality management, enhancing communication with the public and exploring innovative approaches such as citizen science and event duration monitoring. It also reinforced the importance of aligning resources and governance structures to deliver sustainable outcomes.

There are a considerable number of insights provided that will enable DAERA to progress the Bathing Waters Review towards consultation in 2026.

3.2 Next Steps

This report will be provided to DAERA for consideration. It provides a factual account of the 1-day workshop and summarises all the key information gained from the work of the group.

Appendix I: List of Attendee Organisations

1. Antrim and Newtownabbey Borough Council
2. Ards and North Down Borough Council
3. Brompton Belles and Beaus Dippers
4. Causeway Coast and Glens Borough Council
5. Department of Agriculture, Environment and Rural Affairs
6. Department of Health
7. Department for Infrastructure
8. Fermanagh and Omagh District Council
9. Helen's Baywatch
10. Keeping Northern Ireland Beautiful
11. Lisburn and Castlereagh City Council
12. Mid and East Antrim Borough Council
13. Mid Ulster District Council
14. NI Marine task force
15. NI Water
16. National Coarse Fishing Federation of Ireland
17. National Trust
18. Newry Mourne and Down District Council
19. Outscape
20. Paddle NI
21. Public Health Agency
22. Surfers Against Sewage
23. Swim Ulster
24. Tourism NI
25. Triathlon Ireland
26. Ulster Angling Federation

Appendix II: List of abbreviations, tables and figures

List of abbreviations

Abbreviation	In Full
AYR	All Year Round
BG	Blue Green (Algae)
BGA	Blue Green (Algae)
BW	Bathing Waters
BWO	Bathing Water Operators
CSO	Combined Sewer Overflow
DAERA	Department of Agriculture, Environment and Rural Affairs
DoF	Department of Finance
EDM	Event Duration Monitor
E.g.	For Example
ICS	Innovation and Consultancy Services
ID	Identification
NBWO	Non-bathing water operators
NI	Northern Ireland
NIW	Northern Ireland Water
PHA	Public Health Agency
QR	Quick Response
RBA	Risk Based Approach
St	Saint
WQ	Water Quality
WWT	Waste Water Treatment

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Appendix III: Workshop Evidence

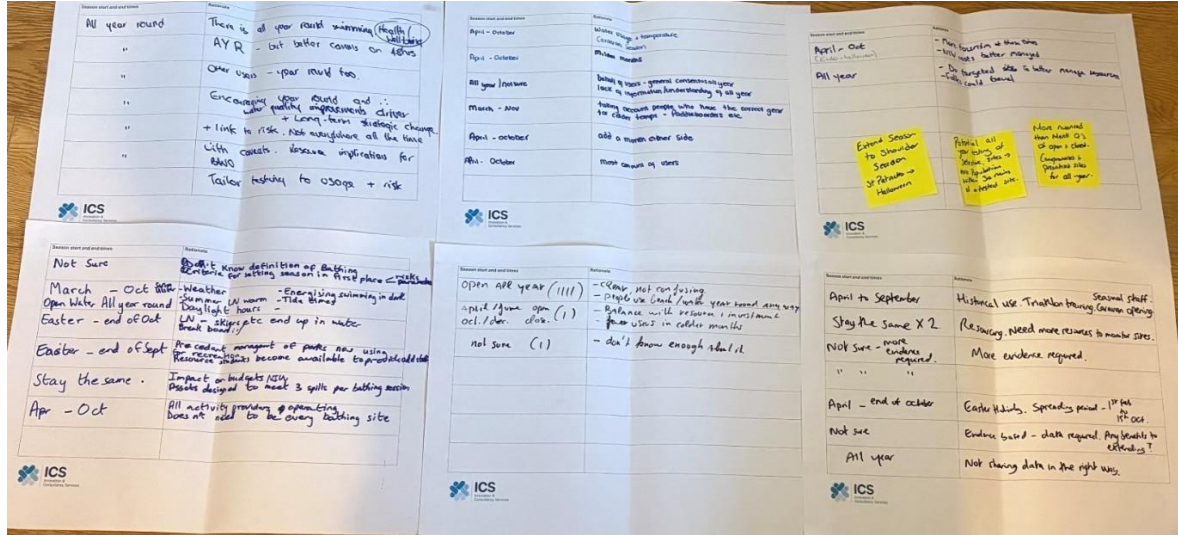
Picture of Minister Muir opening workshop



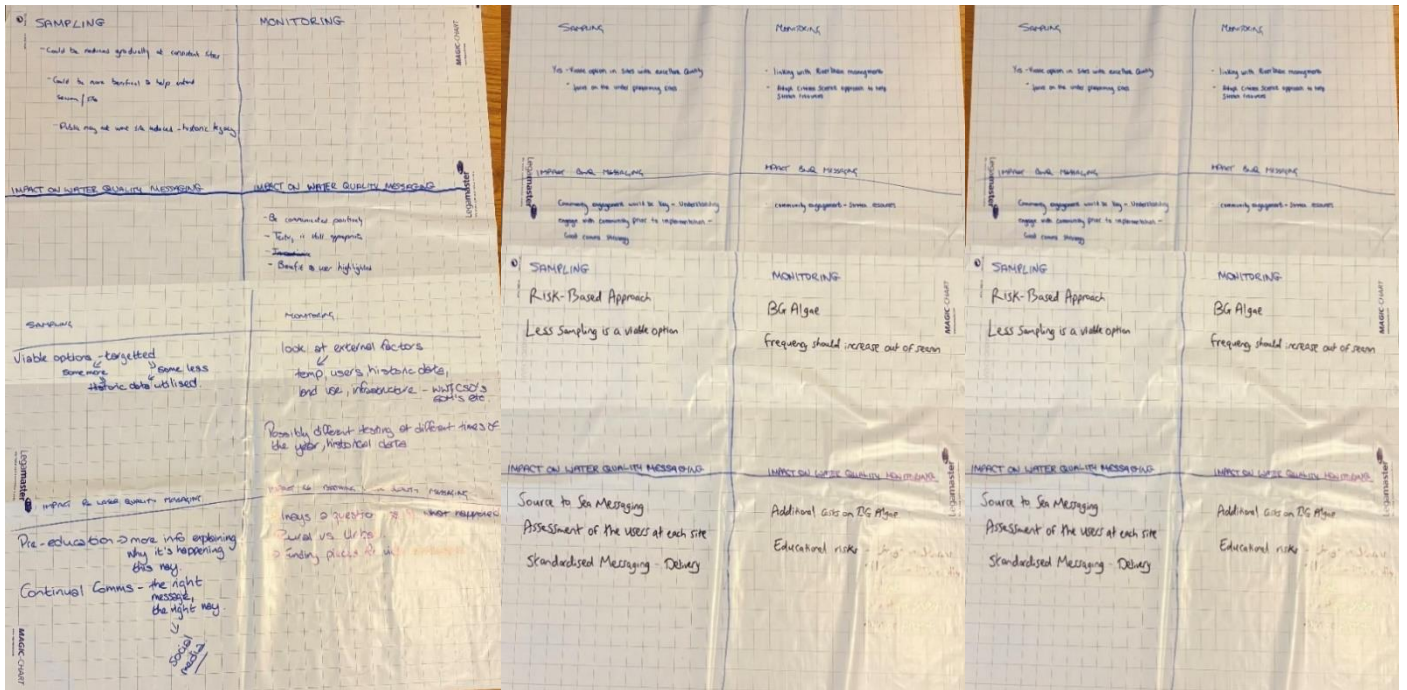
Group Working



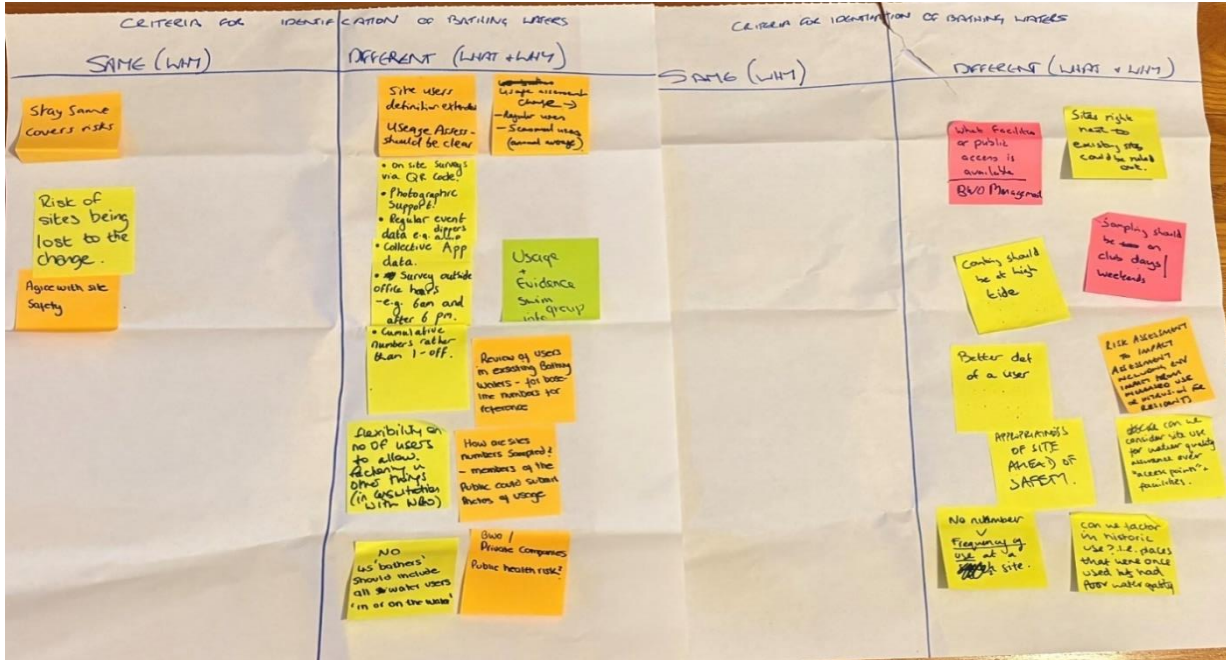
Group discussion feedback on the bathing water season from Exercise 1



Group discussion feedback on sampling, monitoring and impact on messaging from Exercise 2



Group Discussion feedback on the criteria for identification of bathing waters from Exercise 3: Part A



Feedback on approach to the use of candidate sites from Exercise 4





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