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Department of the Environment, Community and Local Government
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Email: waterq@environ.ie

Re: Ibec submission under Consultation on the Timetable and Work Programme for the Development of the Second Cycle River Basin Management Plans

26 January 2015

Dear Niamh,

Ibec is grateful for the opportunity to submit its views under the Consultation on the Timetable and Work Programme for the Development of the Second Cycle River Basin Management Plans.

The points and queries listed below have been considered by Ibec's Environment Policy Committee through its Water Working Group. The Committee's membership consists of over one-hundred voices from all industry sectors and includes many businesses who rely heavily on the provision of a national water policy that is fair, transparent and which balances economic growth and stability with efficient and cost-effective environmental regulation.

As such, Ibec submits the following for your consideration:

1. With respect to the revised governance structures, Ibec recommends an oversight protocol that ensures that the Department of the Environment, Community and Local Government (DECLG) has robust and effective accountability over both the Environmental Protection Agency (EPA) at Tier 2 and the Local Authorities at Tier 3.
2. Ibec queries what role, if any, Irish Water will play in River Basin Management Planning. What considerations for such a role have been put forth?
3. With respect to significant new responsibilities which have been assigned to the EPA at Tier 2, what steps have been or will be taken to ensure that the Agency is allocated sufficient additional and appropriate resources to fulfil these responsibilities?

Ibec is conscious that the number of responsibilities assigned to EPA in recent years has steadily increased, with respect to a number of Agency functions and for a number of reasons. At the same time, however, it is not clear that DECLG has ensured that the Agency has been provided ample resources to meet these responsibilities.

Ibec greatly respects the dedication and hard-work of the Agency and its staff. However, in several notable cases, an imbalance of resources and responsibilities has led to inefficiencies, lack of clarity as to policy, and administrative delays, all of which ultimately drive up costs to EPA, the entities it regulates, and the State. To ensure that further obligations on the Agency, as provided under the EU (Water Policy) Regulations 2014, are met, DECLG should take concrete steps to likewise ensure that EPA is sufficiently resourced.

4. Where Regulation 3 of the EU (Water Policy) Regulations 2014 enumerates several specific Water Policy Advisory Committee members, Regulation 3(j) allows the Minister to determine other organisations or bodies to the Committee. What other such organisations or bodies are envisioned, if any, for such determination?

In any case, Ibec recommends the inclusion of key industry stakeholders on the Committee. As such, Ibec would welcome an opportunity to be included on the Committee and to otherwise assist the Department in identifying additional industry voices for inclusion in same.

Questions on the consultation process

With respect to the specific questions on the consultation process listed in the Consultation Document, Ibec submits the following:

- *Have you any views on the way in which river basin management plans are integrated with other plans and processes?*

River Basin Management Planning should, where appropriate, integrate with flood prevention and management plans and processes, including but not limited to the Catchment-based Flood Risk Assessment and Management (CFRAM) Programme as undertaken by the Office of Public Works.

More generally, in the interests of better government, River Basin Management Planning, and in particular, the agencies, state bodies and other stakeholders – whether assigned to the Water Policy Advisory Committee or not – should operate in a formally coordinated manner, whether through structured arrangements as envisioned in the revised governance structure or otherwise. Wherever feasible, such arrangements should be formalised by way of Memoranda of Understanding or other similar operational agreements.

- *Do you have ideas regarding how best to mobilise public participation in the preparation of the next river basin management plans?*

Ibec suggests that DECLG create an email notification system for all persons and entities with an interest, formal or otherwise, in River Basin Management Planning.

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Ibec appreciates the Department's consideration of the above points and queries. Should you wish to further discuss this submission, please do not hesitate to contact me.

Yours sincerely,



Morgan Baker
Environment Policy Executive

Cc: Donal Daly, Water Framework Directive and Integration Unit, Office of Environmental Assessment, Environmental Protection Agency (d.daly@epa.ie)