

COMMENT ON CONSULTATION DOCUMENT**SUBMITTED BY RORY DUFFY ON BEHALF OF "SAVE OUR LOUGH REE" (SOLR)****MAY 2010-05-24**

Save Our Lough Ree (SOLR) has reviewed the Strategic Themes set out in the Consultation Document issued by the EPA in April 2010. In line with the guidance set out SOLR has only commented on those themes that are central to the goals of SOLR as an organisation. These comments have been set out below;

Theme 2 – SOLR has concerns relating to the process of licensing and feels that this whole area needs to be expanded through review. SOLR feels that the scope of licensing should be broadened to include areas such as Forestry near Riparian zones, run off from intense farming operations in riparian zones as well as land application of fertilisers and slurry in areas that have topographical features that aid run off to water bodies. SOLR believes that the big industries have been tackled regards their impacts on the environment and that the next tranche of licensing should encompass those activities set out above.

In the current economic climate, consideration needs to be given to the probable negative impacts of certain industries ceasing operations, possible legacy of hazardous substances, leakages in time etc.

Theme 3 – SOLR believes that local authorities are not best placed to enforce and monitor local authority licensing activities such as Waste Water and Atmospheric Emission Licensing due to competing priorities within the responsibilities of the Local Authority. SOLR believes that these licences should also be transferred to the EPA as part of their responsibilities.

Theme 5 – SOLR has concerns with the level of monitoring carried out by the EPA on Irelands water bodies and believes that it is currently inadequate and may not even be statistically significant. SOLR believes that having only three sampling points around Lough Ree (as used in the initial sampling to establish the Water Quality standard - Good) is not adequate and if this sampling is not made more robust then the goals to be reached may be based upon inaccurate or "not significant" statistical data. SOLR believes that Lough Ree is acting as a reservoir for nutrients and that the sampling regime implemented to classify the lake does not deal adequately with this issue. SOLR has concerns that

samples of moving water at Lanesborough, Athlone and on the Inny may not paint an adequate picture of the lakes ecological status as Lough Ree is 10500 hectares in size and is represented by three water samples. As Theme 5 states that the EPA should use “Robust Statistical Analysis” Save Our Lough Ree wishes to question the robustness of this sample regime.

Theme 9 – SOLR is aware of the constraints to funding and the issues of staffing levels within the public bodies auctioned with protecting the environment. SOLR is of the opinion that greater involvement and co-ordination from local stakeholders is key to the future of the protection of Ireland’s aquatic environment. To this end SOLR puts forward the idea of having local voluntary environmental wardens who receive training from the EPA but who work on a voluntary part time basis (perhaps just a couple of hours a week). SOLR feels that local interest in such issues is high and that many dedicated and enthusiastic individuals would avail of such a scheme if it were put in place. Evidence of such involvement is noted by examples of local members of the public identifying the invasive species “Hemimysis Anomola” (Bloody Red Shrimp) in Lough Ree in 2009 as well as the involvement of locals in the Lough Ree hatchery project. Another good example is the local litter clearing campaign using boat users to clear rubbish from banks and islands. SOLR believes that this resource can be found in all areas of Ireland and that it should be capitalised on in the current climate.

Rory Duffy on behalf of SOLR

May 2010