



Submission to:

HMWB Consultation

Water Advisory Unit,

Department of Housing, Local Government and Heritage,

Custom House, Dublin 1, D01 W6X0

Email: wau@housing.gov.ie

RE: Submission on the Designation of Heavily Modified Water Bodies (HMWBs) under the 2024 Water Action Plan – Salmon Watch Ireland

Dear Sir/Madam,

Salmon Watch Ireland welcomes the opportunity to provide a submission on the proposed designation of 466 water bodies as Heavily Modified Water Bodies (HMWBs), as part of the 2024 Water Action Plan. However, we must express serious concerns regarding both the scale of the proposed designations and the flawed process that underpins them.

1. Premature and Unsupported Designations

The designation of such a significant proportion of Ireland's water bodies (nearly 9%) as HMWBs represents a major policy shift. It is our view that this proposal is premature, lacking sufficient evidence and justification. No detailed restoration measures or assessments have been made available to demonstrate that GES cannot be achieved in each case, as required under Article 4(3) of the Water Framework Directive (WFD).

As an organisation focused on the protection of migratory fish species, we are particularly concerned that many of these water bodies serve as crucial habitat for wild Atlantic salmon and sea trout. The impact of hydromorphological changes such as arterial drainage, dams, weirs, and barriers to fish migration must be carefully assessed before any designation that would limit or exempt these water bodies from achieving Good Ecological Status (GES).

2. Incomplete and Opaque Designation Process

The consultation documents provided fail to present the detailed, site-specific analysis necessary to justify designation. The process lacks transparency, especially regarding:

- Identification and assessment of feasible restoration measures.
- Evaluation of alternative means to provide the beneficial uses currently cited for modification.
- Socio-economic and ecological trade-offs.

This undermines the credibility of the proposed designations and the ability of stakeholders to participate meaningfully in the consultation process.

3. Impact on Migratory Species and Aquatic Ecology

Migratory fish, including salmon and sea trout, depend on access to a network of clean, free-flowing rivers. The designation of water bodies as HMWBs with the alternative objective of Good Ecological Potential (GEP) effectively lowers the bar for ecological recovery and may entrench the structural and ecological conditions that continue to threaten migratory fish populations.

We are particularly concerned that arterial drainage schemes—frequently cited in the proposed designations—have been shown to degrade spawning habitat, reduce instream complexity, and impair fish passage. These impacts are directly relevant to Ireland’s obligations under the Habitats Directive and the conservation of protected species.

4. Lack of Integration with Broader Policy Goals

The proposed designations do not appear to be integrated with other relevant policies, including:

- The National Hydro morphology Programme.
- Climate and biodiversity targets.
- Land use reforms related to peatland restoration and carbon sequestration.
- Nature Restoration Law implementation.

The potential for conflicting policies—particularly with regard to flood management and climate adaptation—demands a more strategic, integrated approach.

5. Recommendations

Salmon Watch Ireland makes the following recommendations:

1. **Halt the current designation process.**
2. **Undertake a comprehensive, transparent, and waterbody-specific assessment** of restoration options and alternative means of achieving the beneficial uses cited.
3. **Ensure that the designation process integrates with broader environmental, biodiversity, and climate objectives**, including fish conservation and river restoration strategies.
4. **Improve public engagement** by presenting clear, accessible materials and ensuring stakeholder participation through a transparent consultation process.
5. **Prioritise ecological restoration** wherever possible, including the reversal of modifications that significantly impair fish migration, such as obsolete barriers and channelisation. It is alarming that presently Inland Fisheries Ireland has secured funding to remove barriers while this process may impinge on this work.

Conclusion

Ireland's water bodies are under severe pressure from a variety of sources, including physical modifications that directly affect migratory fish. While the WFD allows for HMWB designation under strict conditions, it must be applied only where absolutely necessary and supported by clear, site-specific evidence. The current proposal falls far short of this standard. We urge the Department to revise its approach in the interests of transparency, ecological integrity, and sustainable water management.

Kind regards,



John Murphy

Manager

Salmon Watch Ireland

Date 22 May 2025