



Freshwater Taskforce Response

UK Recommendations on Environmental Standards and Conditions

Thursday 7th June, 2012

The Freshwater Taskforce (FWTF) represents a range of organisations working together to ensure that Northern Ireland preserves and improves freshwater ecosystems by encouraging government and wider society to adopt a sustainable and integrated approach to water management. We have a combined membership that represents of 100,000 people.

The FWTF believes that we need to change our approach to the management of freshwater in Northern Ireland to positively impact upon water dependent habitats. Economic benefits from improved water quality arise in the form of reduced costs of water treatment, increased revenue from tourism and a more cost efficient supply chain for food production.

The FWTF is pleased to be able to comment on this consultation on UK Recommendations for Environmental Standards and Conditions.

We fully support the submission on this consultation from the 'Joint Links' representing Wildlife and Countryside Link, Scottish Environment Link, Wales Environment Link and Northern Ireland Environment Link.

In addition to the comments presented in the Links response, we also note the following:

- **Invasive Species** – Northern Ireland is not covered by the GB Non Native Species Secretariat. Rather, the NIEA working with Invasive Species Ireland performs equivalent functions and are represented on the relevant UKTAG committee. It is our understanding that the same Risk Assessment approach that is adopted for England and Wales is not similarly applied in Northern Ireland. Rather a 'prioritisation schedule' with only the highest ranking priority species undergoing a 'risk assessment' is used. Similarly, the use of 'uncertainty' levels are not similarly applied.

The Freshwater Taskforce are fully supportive of the proposed approach presented in the Joint Links Consultation Response. We would request that there is better harmonisation with the GB NNSS through greater use of risk assessments combined with certainty ratings, secondly, application of a more precautionary approach for relevant species and finally, the information needs to be made public for transparency.

- We are concerned that data from the monitoring of fish stocks in Northern Ireland are not consistently used for the classification of water quality status in all rivers and lakes in Northern Ireland. The Department of Culture, Arts and Leisure are carrying this out on an ad hoc basis using outdated monitoring information. We are particularly concerned about the lack of baseline information available, for example, for Lough Neagh, the largest freshwater lake in the British Isles. We therefore, request that this is urgently addressed through this Review.
- We refer to *SNIFFER WFD 114, Impact of run-of-river hydro-schemes upon fish populations*.

Phase 1 was completed in August 2011 and the report includes a review of literature on run-of-river hydropower schemes, compares and contrasts regulatory frameworks, and provides recommendations for suitable mitigation and monitoring activities. The main recommendations of the Phase 1 Report are highly significant and it is now of the utmost importance that these are implemented. We note the following important elements within the Phase 1 document;

Page 25 Change in Flow Regime Caused by Hydropower

Line 7; Ideally, abstraction regimes should maintain peak flows and protect low flows, and where possible reflect the natural flow regime, i.e. only a fixed portion of the intermediate flow is abstracted (figure 12a).

This reflects the widespread conclusion in published literature that the application of the proportional take is necessary to provide variability of the river flow across the whole of the flow regime, and hence reasonable protection for the river.

Page 38 4.2.7 Cumulative Impacts

Rizzo (1985) concluded that "we must get away from the present method of evaluating multiple hydropower projects on a project by project basis".

Consequently, there is a need to revise the current legislation to accommodate this cumulative impact scenario.

This supports the FWTF view that present policy on cumulative impacts has not worked, and can never work, due to the inherent flaws in the policy of restricting examination to “water bodies”.

Page 47 5.3 Flow Management

The comments here reflect the widespread conclusion in published literature that the application of the proportional take is necessary to provide variability of the river flow across the whole of the flow regime, and hence reasonable protection for the river.

Page 50 5.3 Flow Management

....it is recommended that these restrictive standards are reviewed in a risk-based framework to account for uncertainty of likely impacts of flow regulation of fisheries, and the precautionary approach to management of flows in relation to fish and fisheries is adopted.

As most salmon stocks are now in a parlous state, it is vital that the recommendations of this study are adopted and a much more precautionary approach to abstraction is taken.

Page 57 and 58 Conclusions and Recommendations

The four main recommendations are crucial to our situation here in NI;

“Recommendation 1

It is recommended that detailed studies on the impacts of both low-head and high-head run-of-river schemes on fisheries and other aquatic biota are carried out as a matter of urgency. Such studies should compare the status of the fisheries before and after the schemes become operational...”

Recommendation 2

It is recommended that studies to assess the most effective procedures for mitigating problems arising from small-scale run-of-river hydropower schemes are conducted. Where possible these should be linked to new scheme proposals and be part of the post-monitoring assessments.

Recommendations 3 and 4

It is recommended that as knowledge about the relationships between hydrological characteristics and fish community requirements improve, the standards are revisited. In the mean time, it is recommended that these restrictive standards are reviewed in a risk-based framework (Cowx et al., 2011) to account for uncertainty of likely impacts of flow regulation of fisheries, and the precautionary approach to management of flows in relation to fish and fisheries is adopted.

Recommendation 5

It is recommended that protocols for monitoring the status of fish populations both before and after the scheme is operational are developed and made available for developers to allow them to provide appropriate information for robust EIAs.”