



Inland Waterways Association of Ireland

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The Inland Waterways Association of Ireland Response to Irish Water's Final Options Appraisal Report

Monday, February 13th, 2017

The Inland Waterways Association of Ireland (IWAI) notes the publication of the Final Options Appraisal Report on a new water supply for the Eastern and Midlands Region. The IWAI continues to hold deep concern on this chosen option, the impacts on Lough Derg and given the connectivity of the Shannon River, the possible impacts of this abstraction across the entire Shannon Navigation system.

As mentioned in previous submissions the IWAI campaigned for the preservation, protection and development of the Shannon River as a Navigation to be used by all. This has facilitated the growth of a domestic tourist industry that brings significant visitor numbers with their key economic spend to an area requiring much investment. Impacts on the Shannon as a Navigation have wide reaching environmental and economic consequences.

The IWAI is now pleased to once again to respond to your request for submissions. This follows from our consideration of the Reports as issued and the presentations provided. The IWAI wishes to put on record its appreciation for the efforts in meeting us and allaying some fears held by our members.

IWAI Views and Comments on the Preferred Option;

As mentioned in the initial and second IWAI submission to Irish Water, the importance of water levels to the fauna and flora of the River and its Lakes is a key desire of our Association. This makes the waterways an attractive destination for national and international tourists. With population growth as predicted in your assumptions, which will only increase over time, the possibility of a point where a decision has to be made to restrict abstraction or risk causing ecological and environmental havoc will have to be made. The IWAI believes that steps to prevent such a catastrophic situation should be planned for now rather than reacted to when they occur.

In the view of the IWAI, the Preferred Option of Abstraction from Parteen Basin presents not just a risk to Lough Derg but to the entire Shannon system. If the Parteen Basin has to be kept at a particular level the supply for this has to come from the **entire Shannon** and not just

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Lough Derg. While we note your position that the nearest effect point will be Meelick Weir our experience of water level management to date does not inspire confidence in this assumption.

We note from the information supplied at presentations events and literature, that Irish Water believe that will have no affect upstream of Lough Derg. In the experience of our members' use of the Shannon Navigation we have found that the current manager of water levels, the ESB, will always seek to keep the level in Lough Derg up as much as possible because of the risk to the built embankments and the desire to keep the PowerStation running efficiently by guaranteeing a continuous and constant supply of water. These two factors mean that the ESB must draw down extra water from upstream to make up for the loss to abstraction and obviously that gets worse in dry weather. To date there has been no information or agreement issued by the ESB concerning the changing of water use from power generation to potable use.

Climate change is happening now and into the future and its impacts should be reflected in all modelling. Therefore IWAI believes that it is insufficient to just use historic data to estimate the amount of supply available for abstraction/power generation and need to maintain river flow below Parteen.

As part of your request we set out below the additional information that should be considered in the development of the Preferred Option;

1. Data on flows at each Weir point should be obtained over a significant time period and fed into the flow models as developed. These flow levels should be made public now and into the future via a suitable web based portal. This will inspire public confidence in the project now and into the future.
2. An analysis of extreme events (high & low water levels) should be published

As regards any additional environmental issues or alternative methodologies that should be taken into consideration in preparing the EIS, the IWAI are of the view that to react quickly and to make maximum use of the above data, urgent consideration should be given to the automation of Weirs. This will allow for an effective management of levels on the Shannon from one central control point. This will have in addition to an environmental benefit, a flood risk benefit as the operation of the Weirs will not be weather dependent as is currently the case.

The Preferred Option is just one example of Abstraction from the River Shannon. There are many other water abstraction points on the Shannon, one at Portumna for example and another at Athlone. To date these have been treated as separate abstractions, however they are coming from the one single source. When, especially with population growth and the desire to reduce small water schemes continue, further demands will be made. This will lead to a similar process as the Preferred Option you currently propose. This in our view furthers the need to form one body with statutory responsibility to deal with such matters.

The Preferred Option will result in Ireland having three competing bodies for different usage of the River Shannon's Water;

- Irish Water – to supply water from the Shannon to its customers on the East Coast
- ESB –water for electricity generation,
- Waterways Ireland – for maintenance of Navigation levels with key requirement not to endanger habitats.

The IWAI are of the strong view that a small body charged with the protection of the Shannon should be established with appropriate Service Level Agreements to ensure that water levels and flows are kept to particular levels set by statute. Indeed this statute could cater for the establishment of such a body.

This proposal will ultimately see one body have control of water levels as its primary objective rather than the supply of water to paying customers and as can be seen from the water needs document this supply need is going to increase significantly over the next number of years. There is an urgent need to meet concerns of the many users of the Shannon Navigation by having an independent arbitrator that can decide and act on all requests for abstraction be they municipal, commercial or agricultural.

In conclusion, as the major user of the Shannon Navigation for recreational and boating usage, this Association continues to hold concerns. In the future as a result of abstraction should the levels decrease to a point that regular Navigation is not possible, then a unique recreation and tourism jewel will be lost. This loss will not just affect the users of the navigation but many towns and communities that support this unique and precious jewel.

The Inland Waterways Association of Ireland would like to be further involved in this Appraisal Process and commits to appear at any oral hearing including hearings by An Bord Pleanala.

The preferred address for communications is president@iwai.ie

On behalf of the inland Waterways Association of Ireland



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APPENDIX 1: About the IWAI

The Inland Waterways Association of Ireland (IWAI) is a voluntary body representing over three thousand five hundred enthusiasts, with 23 branches across the island of Ireland.

The Inland Waterways Association of Ireland (IWAI) is an energetic, fun, voluntary organisation with members from all corners of the Island of Ireland, all sharing a keen and passionate enthusiasm for the waterways of Ireland.

The IWAI advocates the navigation, use, maintenance, protection, restoration and improvement of the inland waterways of Ireland. It was formed in 1954 to promote the development, use and maintenance of Ireland's navigable rivers and canals.

When the Shannon was almost totally undeveloped for pleasure boating, the IWAI campaigned against the building of low bridges, thus ensuring the development of the river as a national asset. In the 1960s IWAI successfully campaigned to stop plans to close the Circular Line of the Grand Canal in Dublin. Later the Association campaigned for the re-opening of what is now the Shannon - Erne Waterway (formerly the Ballinamore & Ballyconnell Canal) and the Naas Line of the Grand Canal.

IWAI played its part in the restoration campaign for the re-opening of the Royal Canal between Dublin and the Shannon in recent years. IWAI assistance to the campaign to re-open the Ulster Canal has also borne fruit with the announcement that work is to begin on re-opening the section from the Erne to Clones. Currently, IWAI members are active in restoration projects on the Boyne, Newry and Lagan Canals.

IWAI Branches hold approximately 200 events each year across inland navigations with the wider communities in many locations. These events include Boat Rallies, Harbour Festivals, Walks, Social Gatherings, Heritage Activities; Family activities and Youth focused events.

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