



**Iascach Intíre Éireann
Inland Fisheries Ireland**

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Strategic Environmental Assessment and Appropriate Assessment of the National Broadband Plan – Intervention Strategy

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Inland Fisheries Ireland (IFI) is a Statutory Body established on the 1st July 2010. Under section 7(1) of the Inland Fisheries Act 2010 (No. 10 of 2010) *'the principal function of IFI is the protection, management and conservation of the inland fisheries resource'*. Ireland has over 70,000 kilometers of rivers and streams and 144,000 hectares of lakes all of which fall under the jurisdiction of IFI. The agency is also responsible for sea angling in Ireland.

IFI is mandated to ensure that the inland fisheries of the State are protected. To protect means to 'keep safe, defend, to shield from danger, injury or change'. 'Fisheries' includes all inland fisheries recreational and commercial, sea angling and mollusc fisheries stipulated under the Fisheries Acts (1959 - 2017), the physical habitat upon which the fishery relies, the facilities and access, the quantity and quality of the water and the plant and animal life on which fish depend for shelter and food and the spawning areas where in fish deposit their eggs. The protective role of IFI relates to all aspects of the aquatic environment and all factors that influence the biotic communities within waters, which in any way relate to the propagation of fish populations.

IFI is of the view that the 'National Broadband Plan – Intervention Strategy' in considering the protection of the quality of the aquatic environment must address not only water quality but also include the protection of the physical environment, hydrological processes and biodiversity. In IFI's view, protection of the aquatic environment entails a greater commitment than merely to prevent fish mortality. For example, the insidious impacts of chronic pollution are often just as serious as those dramatic discharges which result in instantaneous fish kills. Chronic, sub-lethal pollution may reduce growth, inhibit reproductive functions or so alter habitat characteristics as to render an impacted area uninhabitable for certain species.

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Maintenance and improvement of fisheries habitat is a particularly important high level objective of Inland Fisheries Ireland. Realisation of this objective demands thorough consideration and understanding of the environmental responses of aquatic life to pollution / environmental degradation and tends towards development of stringent habitat and water quality objectives and associated management practices. An important element (and a good example of the complexity of this area) in the maintenance of habitat is the protection of the food chain. The protection of each stage of the food chain is the very basis of aquatic habitat protection. Destruction of habitat or contamination of the food chain at any level may eliminate any other form of life depending on it.

The EU Water Framework Directive (2000/60/EC) requires the protection of the ecological status of river catchments which encompasses water quality and requires the conservation of habitats supporting aquatic ecological communities. One of the primary objectives of the Directive is to establish a framework which prevents further deterioration and protects and enhances the status of aquatic ecosystems. It is important when planning any scheme with potential impacts on surface waters to make provision for Ireland's commitments in relation to WFD including the objective to protect High Status sites. It is important to note that Article 5 of the 2009 Surface Water Regulations requires that a public authority, in performance of its functions, shall not undertake those functions in a manner that knowingly causes or allows deterioration in the chemical or ecological status of a body of surface water. Furthermore article 28(2) of the said Regulations states that a surface water body whose status is determined to be less than good shall be restored to at least good status not later than the end of 2015.

When developing the National Broadband Plan further, all measures necessary should be adopted and incorporated to ensure protection of local aquatic ecological integrity, in the first place by complete impact avoidance and only as a secondary approach through mitigation by reduction and remedy.

In determining the likely significant effects of any plans or programmes, regard should be given to the need for the sustainable development of the inland and marine fisheries resource (including the conservation of fish and other species of fauna and flora, aquatic habitats and the biodiversity of inland and marine water ecosystems). Consideration should also be given to potential significant impacts on:





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- Water quality including assimilative capacity.
- Aquatic and associated riparian habitats.
- Biological Diversity.
- Ecosystem structure and functioning.
- Fish spawning and nursery areas.
- Surface water hydrology.
- Passage of migratory fish -
- Areas of natural heritage importance including geological heritage sites.
- Sport and relevant commercial fishing and angling - angling currently contributes €836 million to Ireland's economy annually, supporting upwards of 11,000 jobs, many of which are in rural and coastal areas. Under the National Strategy for Angling Development IFI is aiming to increase the contribution from angling to €932 million and increase employment by 1,800 jobs.
- Amenity and recreational areas.

Additional areas for consideration in the National Broadband Plan – Intervention Strategy are as follows:

- The 1997 Habitats Regulations and Special Areas of Conservation (SAC) Directive do not extend to the inclusion of all aquatic habitats of fish bearing importance or of amenity value. Therefore the reliance of any plan on these area designations solely will exclude significant numbers of waterways which are in need of consideration and protection. Please refer to IFI for further information on fish sensitive waters.
- Stream Fragmentation - Inland Fisheries Ireland has recently launched the AMBER project. The project - Adaptive Management of Barriers in European Rivers, seeks to raise awareness of the problems posed by stream fragmentation, the pressures on freshwater ecosystems and the need for innovative solutions to restore river connectivity. All major rivers across Europe are disconnected from the sea to varying degrees as a result of barriers, with disastrous impact on many fish species. AMBER, which is a €6.2 million Euro multi-disciplinary research project, will see 19 partners from 11 countries, including Ireland, combine citizen science and cutting-edge technology to map the distribution of barriers and assess their effects on freshwater organisms. It will work with hydroelectric companies, water providers, NGOs, anglers and local authorities to restore river connectivity. IFI recommends that the National Broadband Plan should include a statement on the prevention of river fragmentation and encourage the connectivity or the re-connectivity where possible on fisheries waters. IFI should be consulted on any relevant proposed developments.

(Additional information on the AMBER project, is available at www.fisheriesireland.ie/research).



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A key publication for consideration when developing the National Broadband Plan – Intervention Strategy is listed below:

- *Guidelines on protection of fisheries during construction works in and adjacent to waters.* These can be accessed at: <http://www.fisheriesireland.ie/fisheries-management-1/624-guidelines-on-protection-of-fisheries-during-construction-works-in-and-adjacent-to-waters>

Should you require clarification on any of the above or require a consultation meeting please contact the undersigned at IFI Galway.

Yours sincerely,