



The Northern Ireland Marine Taskforce (NIMTF) is a coalition of non-government environmental organisations – it includes RSPB, Ulster Wildlife, Wildfowl and Wetlands Trust, National Trust, Friends of the Earth, Marine Conservation Society, Live Here, Love Here, Irish Whale and Dolphin Group, Surfers Against Sewage, Shark Trust, Causeway Coast & Glens Heritage Trust and Northern Ireland Environment Link. The NIMTF has the support of approximately 100,000 local people. We are working towards healthy, productive and resilient seas for Northern Ireland.

Northern Ireland Marine Task Force response to: [Consultation on the Significant Water Management Issues](#)

Submitted: 12th June 2026

NIMTF thanks DAERA for the opportunity to respond to the Significant Water Management Issues (SWMI) Consultation and highlight additional pressures and threats which will impact on water quality within our marine environment and subsequently onto existing marine protected areas (MPAs) which cross-over with the waterbodies highlighted within this consultation. For information on a source-to-sea approach, please see our joint response with the Freshwater Task Force (FWTF).

1. Do you think we have correctly identified the significant issues impacting on water resources in Northern Ireland?

No,

NIMTF would agree with the generalised overview of the scope of significant issues impacting on water resources having been identified within Northern Ireland have been more than adequately covered not only within this response, but in previous workshops that have taken place in 2025 and in 2026. What is unsure however, is how far down into each of the significant issues which have been identified does this consultation go? It is mentioned that septic tanks, agriculture and urban wastewater have been identified, but in previous workshops there was a plan to develop management measures associated with this for the developing River Basin Management Plans (RBMPs) - yet the workshops for the RBMPs are releasing before the conclusion of this consultation.

Action: DAERA to outline how this consultation will inform the upcoming workshops scheduled for early June around the development of management measures for the RBMPs.

Action: DAERA to outline what further action will be taken for each specific identified water management issue to be addressed within the RBMPs.

Given that work was previously done on numerous occasions as outlined above, and given the shape and content of this consultation, it is unclear what the purpose of the previous workshops has been

as the graphs and content remain largely the same as when we participated in those engagement sessions.

Action: DAERA to outline what has changed since the workshops and how this information has been included within the updated SWMI.

2. Are there other significant issues we have not captured?

Yes

Please provide details and identify the Local Management Area(s) if possible.

At the UK level, NIMTF understands that there is more than just the Water Framework Directive (WFD) which was transposed into The Water (Amendment) (Northern Ireland) (EU Exit) Regulations 2019 which water quality must be improved by under statutory obligations. As it currently stands, we are failing to meet 13 out of 15 indicators of ocean health (2024)¹, a further degradation from the 2019 assessment which was failing to meet 11 out of 15 indicators². Achieving Good Environmental Status through the UKMS must be achieved alongside achieving Good Ecological Status under the WFD. Relevant indicators of the UKMS have been highlighted within the Annex our response to the Nature Recovery Strategy³, but the relevant indicators for here would be Benthic Habitats (GES not met), Pelagic Habitats (GES uncertain), Eutrophication (GES met), Contaminants (GES not met), Anthropogenic Sound (GES uncertain), Contaminants in Seafood (GES partially met), Non-Indigenous Species (GES uncertain) and Marine Litter (GES not met). Given that the majority of the waterbodies concerned within this consultation will be impacted past the 1 nautical mile, it is important that the importance and significance of these impacts upon the protected network and the overall health of our seas is better understood - to ensure that NI is able to contribute their progress in meeting statutory obligations.

The overall impact from marine litter, for example, is widely known, with NIMTF member Live Here, Love Here highlighting that the stagnation in litter levels is having an adverse effect on biodiversity recovery in Northern Ireland. Litter contains toxins that harm wildlife and affect other areas, such as soil quality; and this is important given that the UKMS metric for "Marine Litter" is 'Beach Litter' having been met⁴, however the Marine Litter Surveys are still consistently finding plastic pollution persistently on our beaches and within the top 10 of items being counted⁵. We cannot allow the 4th Cycle RBMP to fall into the same issues that the previous 3 have fallen into - we must reverse the issue of water quality in our waters.

Action: DAERA to ensure that there are also connections to the UKMS in improving indicators relevant to achieving Good Environmental Status alongside Good Ecological Status.

Given that the UKMS directly relates to the health of our seas, it is also the metric which the Marine Nature Recovery Oversight Group are using to assess how effective legislation is, alongside the Environmental Improvement Plan, to support whether or not effective protection is in place for protected areas across Northern Ireland. NIMTF will outline our concerns for the MPA network which

have not been acknowledged within the consultation, which would convey the additional, required designations against significant water management issues. We have applied this to the relevant RBD's where they appear but have not been acknowledged. Within each area, NIMTF will highlight where there is greater sensitivity to water pollution for priority marine features identified within those designations.

Table 1. Highlighting which LMA intersects with which MPA which have water quality identified as a threat/pressure within the Conservation Objectives and Potential Management Options documents.

North West River Basin District	
Local Management Area	MPAs Which Identifies Water Quality/Pollution/Nitrogen as a Threat/Pressure
Roe LMA	Lough Foyle ASSI ⁶ Lough Foyle SPA ⁷ Magilligan SAC ⁸
Faughan LMA	Lough Foyle ASSI ⁶ Lough Foyle SPA ⁷
Burn Dennet & Foyle LMA	Lough Foyle ASSI ⁶ Lough Foyle SPA ⁷
Neagh Bann River Basin District	
Local Management Area (LMA)	MPAs Which Identifies Water Quality/Pollution/Nitrogen as a Threat/Pressure
Lower Bann LMA	Magilligan SAC ⁸ Bann Estuary ASSI ⁹ Bann Estuary SAC ¹⁰
Carlingford & Newry LMA	Carlingford Lough ASSI ¹¹ Carlingford Lough MCZ ¹² Carlingford Lough SPA ¹³ Carlingford Lough Marine pSPA Mournes Coast ASSI ¹⁴
North East River Basin District	
Local Management Area	MPAs Which Identifies Water Quality/Pollution/Nitrogen as a Threat/Pressure
Glens and Rathlin LMA	Rathlin Coast ASSI ¹⁵ Rathlin Island MCZ ¹⁶ Carrickarde ASSI ¹⁷ Castle Point ASSI ¹⁸ Ballycastle Coalfield ASSI ¹⁹ Fair Head and Murlough Bay ASSI ²⁰

	Red Bay SAC ²¹ Waterfoot MCZ ²² Galboly ASSI ²³ East Coast Marine pSPA ²⁴ The Maidens SAC ²⁵ The Maidens ASSI ²⁶ North Channel SAC ²⁷
Bush LMA	Fair Head and Murlough Bay ASSI ²⁰ Castle Point ASSI ¹⁸ Carrickarde ASSI ¹⁷ White Park Bay ASSI ²⁸ North Antrim Coast SAC ²⁹ Giant's Causeway and Dunseverick ASSI ³⁰ Skerries and Causeway SAC ³¹ Portrush West Strand ASSI ³² Rathlin Island MCZ ¹⁶ Rathlin Island Coast ASSI ³³ Bann Estuary ASSI ⁹ Bann Estuary SAC ¹⁰
Larne Lough	Larne Lough ASSI ³⁴ Larne Lough SPA ³⁵ North Channel SAC ²⁷ East Coast Marine pSPA ²⁴
Belfast Lough	Outer Belfast Lough ASSI ³⁶ Belfast Lough SPA ³⁷ Belfast Lough Open Water SPA ³⁸ Outer Ards ASSI ³⁹ Outer Ards SPA ⁴⁰ North Channel SAC ²⁷ Outer Belfast Lough MCZ ⁴¹ Copeland Islands ASSI ⁴² Copeland Islands SPA ⁴³ East Coast Marine pSPA ²⁴
Lagan	Belfast Lough SPA ³⁷ Strangford Lough Part 1 ASSI ⁴⁴ Strangford Lough MCZ Strangford Lough SAC ⁴⁵ Strangford Lough SPA ⁴⁶
South Down	Sheepand Coast ASSI ⁴⁷ Strangford Lough MCZ Killough Bay and Strand Lough ASSI ⁴⁸

	Killough Bay SPA ⁴⁹ St John's Point ASSI ⁵⁰ Murlough SAC ⁵¹ Tyrella and Minerstown ASSI ⁵² Murlough ASSI ⁵³ Mournes Coast ASSI ⁵⁴ Carlingford Lough Marine pSPA Kilkeel Steps ASSI ⁵⁵ Carlingford Lough ASSI ¹¹ Carlingford Lough SPA ¹³
Strangford	Copeland Islands ASSI ⁴² Copeland Islands SPA ⁴³ North Channel SAC ²⁷ Outer Ards ASSI ³⁹ Outer Ards SPA ⁴⁰ East Coast Marine pSPA ²⁴ Strangford Lough MCZ Strangford Lough Part 1 ASSI ⁴⁴ Strangford Lough Part 2 ASSI ⁵⁶ Strangford Lough Part 3 ASSI ⁵⁷ Strangford Lough SAC ⁴⁵ Strangford Lough SPA ⁴⁶ Killard ASSI ⁵⁸ Sheepand Coast ASSI ⁴⁷

NIMTF are deeply concerned that the above has been reduced down to a simple, generalised statement of “Many of these areas have been designated as protected areas due to their ecological importance” which appears 12 times across the 131-page document to highlight that these LMAs have protected sites within them for ecological reasons. The document itself then fails to acknowledge the importance of those ecological importance and does not provide a mapped out assessment on the significant impacts of poor water quality on the MPA Network. Whilst NIMTF does understand that the relevant legislation around water pollution does not cross-over with protected area legislation, in reality the two are not in isolation of one another and should be managed in parallel, given that so many of the above sites have water quality as an identified pressure which requires management. Previous discussions with DAERA and NIEA have highlighted that the RBMPs are the main mechanism, alongside the implementation of the Nutrient Action Programme to address the issue of water quality across Northern Ireland.

Action: DAERA to assess the cross-over between waterbodies and the above highlighted MPAs around Northern Ireland to assess if a highlighted Programme of Measures needs to be implemented within the RBMPs.

3. What interventions would you suggest to tackle these issues under the following four pillars?

The FWTF and NIMTF have previously highlighted within our joint response to the Fisheries, Aquaculture and Water Environment Bill⁵⁹ that the 4 pillars as a framework by themselves do not represent integrated catchment management, which is the fundamental basis for river basin management planning. We suggest that some of the interventions and suggested measures will not fall neatly within one (or any) of these pillars. Whilst we have used the framework, we highlight the need to link to wider supportive structures and frameworks which alongside would support:

a) Education

Education is critically important to ensure that those who are contributing to significant water management issues know how to reduce their overall impact. This applies to both industrial and public individuals as we all have a responsibility to ensure that our waters are clean, healthy and productive. NIMTF are establishing a network of community advocates⁶⁰ who can take action through increased awareness and knowledge of what is occurring within our marine environment and providing them the tools to upskill themselves and advocate for cleaner water around Northern Ireland. As part of the next iteration of NIMTF, we will be exploring how to strengthen the connection with the marine environment across different Departments of the NI Executive.

Action: DAERA to collaborate with the Departments for Education and Communities to ensure greater awareness of how society can support the implementation of the RBMPs.

b) Incentivisation and Innovation

Further work will be needed here to incentivise a greater need for the inclusion of nature-based solutions as a method to support the water quality crisis that we are facing, which will also improve biodiversity and address the climate crisis too. NIMTF have previously highlighted the importance of blue-carbon related nature based solutions within our response to the Blue Carbon Action Plan 2025 - 2030⁶¹, the Climate Action Plan 2023 - 2028⁶² and the statutory obligations to nature-based solutions under the Climate Change (Northern Ireland) Act 2022⁶³. The opportunities have been identified through the Nature Recovery Networks Partnerships⁶⁴ and through data available through the WWT Wetland Potential Maps⁶⁵ which are readily available to all of society.

Action: DAERA to continue working with the Department for Infrastructure to incorporate Nature-based solutions into the planning process to support national and international statutory obligations through available data portals.

c) Regulation

It is clear to see that from the figures provided for each of the LMAs that water quality needs to be improved across the board. This is further necessary for LMAs which specifically interact with sites previously highlighted within Table 1 as being vulnerable to water quality as a pressure within their Conservation Objectives and Potential Management Options as part of their designation. From an NIMTF perspective, it is irrelevant whether or not nutrient pollution is coming from agriculture or

sewage/wastewater discharges as both result in a decline in the species and habitat populations. The Habitat Regulations Assessment Overview Report (2026)⁶⁶ highlights that only 4 out of 18 marine and coastal habitats are considered “Favourable” in terms of their conservation trend, with many others either “Unfavourable-bad” or “Unknown”. NIMTF is aware that there is intention to remove the provisions in place under SORPI to address the lack of water quality regulation placed on NI Water.

Action: Regulation must be in place around nutrient thresholds and implemented to ensure Favourable conservation trends and progression to achieving Good Environmental Status.

d) Enforcement

It continues to be disappointing to see that Northern Ireland still consistently does not have any live Event Duration Monitoring taking place across any sewage discharge points - especially major storm overflows, according to the Surfers Against Sewage UK Live Sewage Map⁶⁷. It will be important that the RBMPs alongside the proposed penalties of the Fisheries and Water Environment Bill are aligned to ensure that financial penalties not only act as a deterrent, but they can go into the incentivisation of nature-based solutions by redirecting financial penalties towards investment in improving wastewater systems and developing a Sustainable Urban Drainage System (SuDS) Management Train Approach.

NIMTF have previously highlighted that the financial penalties relating to fish kills from water pollution incidents have been minimal. NIMTF’s response to the Review of Environmental Governance for Northern Ireland⁶⁸ showcased a series of smaller, financial penalties across fish mortalities in freshwater environments (Glengornan River, Glenavy River⁶⁹, Crumlin River⁷⁰, Lagan River⁷¹, Ballymoney River⁷² and excessive levels of pollution in marine environments (Belfast Lough⁷³)) where the penalties have not been sufficient enough to deter further infringements on protections. According to figures obtained by the BBC News NI, there were only 63 fines handed down between 2020 and 2024 associated with water pollution impacts. These fines ranged from £200 to £10,000, whilst only 6 of these were more than £5000⁷⁴. Between 2020 and 20224, incidents that were reported were classified as follows: 96 of the incidents were deemed to be high severity, whilst 542 were classed as medium severity and the remaining incidents classed as low. For further information, please see the joint response with the FWTF to the Fisheries and Protecting the Water Environment Bill consultation⁵⁹.

Action: DAERA to ensure there are strong links to the updated Fisheries, Aquaculture and Water Environment Bill to the RBMPs to ensure that financial penalties support regulation and enforcement.

4. We will carry out screening or impact assessments when developing the draft Programme of Measures. Is there anything that you think needs to be considered when carrying out the Equality screening, Rural Needs Assessment, Strategic Environmental Assessment and Habitats screening?

Please provide details.

N/A

NIMTF once again thanks the Department for the opportunity to further develop the SWMI and subsequent RBMP through this consultation. It is hoped that we can better understand how the approaches we take through this will provide greater benefits and management to our existing protected area networks and encourage their ecosystem functionality to better support all of society.

For further information, please contact the NIMTF Officer, Robert Walsh on robert.walsh@nimtf.org.

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