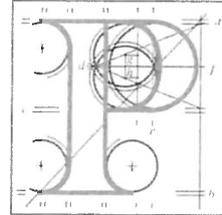


**Our Case Number:** ACP-323980-25



An  
Coimisiún  
Pleanála

Inland Fisheries Ireland  
Belmont  
Drumsna  
Carrick on Shannon  
Co. Leitrim

**Date:** 05 March 2026

**Re:** Proposed Water Supply Project for the Eastern and Midlands Region  
in the counties of Clare, Limerick, Tipperary, Offaly, Kildare, and Dublin.

Dear Sir / Madam,

An Coimisiún Pleanála has received your submission in relation to the above-mentioned proposed development and will take it into consideration in its determination of the matter.

The Commission will revert to you in due course in respect of this matter.

Please be advised that copies of all submissions / observations received in relation to the application will be made available for public inspection at the offices of the local authority and at the offices of An Coimisiún Pleanála when they have been processed by the Commission.

More detailed information in relation to strategic infrastructure development can be viewed on the Commission's website: [www.pleanala.ie](http://www.pleanala.ie).

If you have any queries in the meantime, please contact the undersigned officer of the Commission. Please quote the above mentioned An Coimisiún Pleanála reference number in any correspondence or telephone contact with the Commission.

Yours faithfully,

Eimear Reilly  
Executive Officer  
Direct Line: 01-8737184

PA09

Teil	Tel	(01) 858 8100
Glaó Áitiúil	LoCall	1800 275 175
Facs	Fax	(01) 872 2684
Láithreán Gréasáin	Website	<a href="http://www.pleanala.ie">www.pleanala.ie</a>
Ríomhphost	Email	<a href="mailto:communications@pleanala.ie">communications@pleanala.ie</a>

64 Sráid Maoilbhríde	64 Marlborough Street
Baile Átha Cliath 1	Dublin 1
D01 V902	D01 V902

## Eimear Reilly

---

**From:** LAPS  
**Sent:** Monday 23 February 2026 14:39  
**To:** Eimear Reilly  
**Subject:** FW: IFI submission in relation to Water Supply Project Eastern and Midlands Region  
**Attachments:** WSP Planning IFI Sub 2026 23february2026.pdf

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

**Categories:** Muirin, PA Only

---

**From:** Catherine Kerins <Catherine.Kerins@fisheriesireland.ie>  
**Sent:** Monday, February 23, 2026 1:46 PM  
**To:** LAPS <laps@pleanala.ie>  
**Cc:** David McInerney <David.McInerney@fisheriesireland.ie>; Catherine Hayes <Catherine.Hayes@fisheriesireland.ie>  
**Subject:** IFI submission in relation to Water Supply Project Eastern and Midlands Region

You don't often get email from [catherine.kerins@fisheriesireland.ie](mailto:catherine.kerins@fisheriesireland.ie). [Learn why this is important](#)

**Caution:** This is an **External Email** and may have malicious content. Please take care when clicking links or opening attachments. When in doubt, contact the ICT Helpdesk.

Dear Sir/Madam

Please find attached IFI's submission in relation to the Water Supply Project Eastern and Midlands Region SID application. Please do not hesitate to contact me should you have any queries.

Regards

Catherine Kerins  
Senior Fisheries Environmental Officer  
Inland Fisheries Ireland - Drumsna

-----  
**Iascach Intíre Éireann**  
**Inland Fisheries Ireland**

Tel +353 (0)7196 24218  
Mob +353 (0) 87 2860942

Email [Catherine.kerins@fisheriesireland.ie](mailto:Catherine.kerins@fisheriesireland.ie)

Web [www.fisheriesireland.ie](http://www.fisheriesireland.ie)

Belmont, Drumsna, Carrick on Shannon, Co. Leitrim, N41 HD78, Ireland.  
-----

**Help Protect Ireland's Inland Fisheries**

**Call 0818 34 74 24 to report illegal fishing, water pollution or invasive species.**

**Catherine Kerins**  
**Senior Fisheries Environmental Officer**

✉ [Catherine.Kerins@fisheriesireland.ie](mailto:Catherine.Kerins@fisheriesireland.ie) • ☎ +353 (0)61 300238 • 🌐 [www.fisheriesireland.ie](http://www.fisheriesireland.ie) • 🏠 N41 HD78



**IFI**  
**Iascach Intíre Éireann**  
**Inland Fisheries Ireland**

beolín / hotline  
**0818 34 74 24**

Oscailte 24 uair an lae / 7 lá in aghaidh na seachtaine  
Open 24 hours a day / 7 days a week

Help us protect Ireland's rivers, lakes and coastlines by reporting illegal fishing, water pollution or invasive species.  
Our confidential phone number is 0818 34 74 24, which is open 24 hours a day / 7 days a week.

To read our Privacy Policy and Email Disclaimer Notice, Please visit [www.fisheriesireland.ie](http://www.fisheriesireland.ie)

An Coimisiún Pleanála  
64 Marlborough Street,  
Dublin 1



**Iascach Intíre Éireann  
Inland Fisheries Ireland**

23<sup>rd</sup> February 2026

**Re. Water Supply Project Eastern and Midlands Region – Application to An Coimisiún Pleanála in respect of a Strategic Infrastructure Development.**

Dear Sir/Madam,

Inland Fisheries Ireland (IFI) is a Statutory Body established on the 1<sup>st</sup> of 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 kilometres 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, including all inland fisheries recreational and commercial, sea angling and mollusc fisheries as stipulated under the Fisheries Acts (1959 - 2017). It also includes the physical habitat upon which the fishery relies, the facilities and access, the quantity and quality of the water, the plant and animal life on which fish depend for shelter and food and the spawning areas wherein 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.

Inland Fisheries Ireland believe that fish and the aquatic environment must be considered at all stages and across all elements of this project to ensure protection of the fisheries resource. Consultation with IFI must be on-going to allow data exchange and ultimately to maximise the environmental benefits of the project and to secure sustainable water management in the future.

The Living Planet Report (2020) highlights that of all biomes on the planet, populations of freshwater species have experienced the most severe decline, estimated at 84%.



**Iascach Intíre Éireann  
Inland Fisheries Ireland**

A second recent report, *The World's Forgotten Fishes*, finds that populations of migratory fishes have fallen by three-quarters in the last 50 years. This is also the case in Ireland with a decline of 90% in the numbers of returning Atlantic salmon since 1975, a greater than 90% decline in the European eel and sea lamprey now classified as near threatened. The European Smelt (*Osmerus eperlanus*) is red-listed coastal/estuarine species that spawns in large numbers in spring along the vegetated walls of the Shannon River and tailrace through Limerick city. The Shannon is one of the key spawning populations of Smelt in Ireland. The Irish Pollan (*Coregonus pollan*) is a rare fish species unique to the Island of Ireland with its current known distribution being limited to five lakes, Lough Neagh, Lower Lough Erne, Lough Ree and Lough Derg (Rosell et al. 1997) and Lough Allen (Harrison et al. unpublished data). The Irish Pollan is a member of the whitefish family which contains other closely related species such as the Scottish Powan (*Coregonus lavaretus*). The Pollan populations in Lough Derg, Lough Ree and Lower Lough Erne have undergone a marked decline in the last century with their levels now 1% of their former levels (Rosell 1997; Harrod et al. 2002), (Rosell et al. 2004). Therefore, any activity that could potentially threaten the Pollan population in the lake must be assessed in detail. The main threats to Pollan include eutrophication, competition with introduced species, increased water temperature above thermal tolerances, land drainage and resultant siltation of lakes downstream of drained rivers (Griffiths 1997, Harrod et al. 2001). The threatened nature of these fish species makes them especially vulnerable to any additional pressures such as that which may arise from the current proposal.

### **Climate Change**

This is one of the most significant water infrastructure projects to be developed in Ireland in a generation and it is key that sustainability now and in the future is central to project design and development. Climate change is predicted to cause increases in air temperature, heatwaves, dry periods/droughts and heavy precipitation events. The main impacts of climate change on fish species are predicted to be on their distribution, abundance, phenology (timing of important life events such as spawning, migrations, and hatching), species composition and community structure and



**Iascach Intíre Éireann  
Inland Fisheries Ireland**

dynamics. The fisheries-associated impacts also include altered flow regimes, increases in water temperature (and resulting decrease in oxygen concentration) and loss of habitat. Food-webs will also be altered with unpredictable consequences for fish production. Increasing risks of new invasive species and spreading of water-borne diseases provide additional concern. Additionally, the effects of existing anthropogenic pressures (e.g. nutrient enrichment, hydro-morphological changes, and invasive species) on freshwater environments and their fish species are likely to interact with climate change associated pressures (e.g., rising temperatures and droughts) and seriously affect freshwater fish species and other aquatic life. Current flow regimes and low-flow rates are unlikely to remain static into the future and Q95 flows have been simulated to decrease by up to 40% by century end which in itself becomes a barrier to fish migration. Therefore, IFI believe it is key that this shifting baseline is incorporated into any abstraction regime and accounted for in any modelling of the potential impacts.

With regards to predictions of future lower flows in Irish Rivers, these systems include the critically important and internationally recognised SAC systems. It is important that this scheme recognise the existing and future pressures upon all SACs linked to abstractions and future predicted flows. Alleviation of the pressures upon these SAC systems linked to UE abstractions must be integral to this overall scheme.

### **WFD Assessment**

IFI believe that the WFD assessment is inadequate in its analysis of the scheme on fish and their habitats. While work has been and is ongoing to assess and mitigate barriers in Ireland there is adequate information in the published literature on the impact of barriers, fish swimming abilities and the species present in the Shannon system to make an assessment of the impact of the abstraction on these species. The WFD assessment should be strengthened to fully assess the potential impacts of this abstraction on fish species present and habitat.



**Iascach Iníre Éireann  
Inland Fisheries Ireland**

### **Abstraction**

There is a clear need for the abstraction regime to account for any proposed changes to the base flow down the Old River Shannon as a result of the outcome of the Eflow study as part of the Lower Shannon fish passage project.

While there may be no impact on the lake if levels are maintained within the normal operating band there may be downstream effects on the ecology, environment and hydrology of the tailrace and the old channel. This will have potential implications for both up- and down-stream migrating fish and resident fish in the lower channel. Again, the contingency for this scenario needs to be clarified and mitigation measures defined and built into the operating procedures.

IFI also seek clarification about the process for future changes to the permitted abstraction rate if future demand exceeds forecasts, this should be addressed in any future planning application. IFI has serious concerns about the potential impacts of this abstraction on species such as Pollan which spawn in the shallow, rocky or littoral areas of lakes. Abstraction on the scale proposed has the potential to have considerable impact on the pollan populations of Lough Derg where additional shoreline and fringing habitat may become exposed due to a drop in lake levels.

In relation to the proposed abstraction the following issues should also be considered to assess potential impacts on the River Shannon, Parteen Basin and Lough Derg:

This project involves the transfer of water between river catchments, clarification should be sought to determine if this is compliant with the Water Framework Directive and other relevant European legislation.

### **Infrastructure and Pipeline Construction**

Inland Fisheries Ireland has serious concerns over the sustainability of a pipeline of considerable length (c. 170 km) which will cross many watercourses and could result



**Iascach Intíre Éireann  
Inland Fisheries Ireland**

in significant fisheries habitat loss or damage. There is also considerable risk to watercourses in terms of pollution from suspended solids, concrete, chlorine and hydrocarbons during construction. The timing and methods used for any instream works or works in the vicinity of watercourses shall be agreed with IFI in advance of works.

In relation to the proposed Water Treatment plant IFI has concerns about the storage and disposal of the substantial amounts of waste such as sludge produced by the plant. It is noted that this will be stored on site, dried and then removed from the site for re-use. IFI is also concerned about the associated risks of pollution to the Kilmastulla River system both during construction and operation of the plant. It is noted that the surface waters from the Water Treatment plant site drain to a tributary of the Kilmastulla River. The Kilmastulla River is a salmonid watercourse with good nursery and spawning habitat for both salmon and brown trout, which supports lamprey species and eels.

Notwithstanding the above comments, should this project be granted planning permission, where existing water treatment plants will be decommissioned as part of this project or where intake weirs and instream structures are no longer required due to the new source of water, then IFI require that these instream structures are removed from watercourses as a priority, especially where they pose a barrier or have potential to impact on fish passage.

Ground preparation and pipe-laying construction works have significant potential to cause the release of sediments and pollutants into surrounding waters. Pollution of the adjacent freshwaters from poor on-site construction practices could have a significantly negative impact on the fauna and flora of surface waters in this area. As with any development, all preventative and mitigation measures necessary should be taken to ensure comprehensive protection of local aquatic ecological integrity, in the first place by complete impact avoidance and as a secondary approach through mitigation by reduction and remedy. River crossings should be planned and executed



**Iascach Intíre Éireann  
Inland Fisheries Ireland**

in an environmentally sensitive way, preferably using tunnelling or boring techniques, unless specifically requested by IFI. All works should adhere to IFI's Guideline documents on road construction (attached) and Guidelines on protection of fisheries during construction work in and adjacent to waters <http://www.fisheriesireland.ie/fisheries-and-construction-works>. The maintenance of habitat integrity (both in-stream and riparian) is essential in safeguarding the ecological value of these important systems. Any works directly affecting watercourses or riparian habitats must first be submitted to IFI for assessment.

Disturbance of in-stream habitats should be minimised. Any in-stream works can only be carried out during the open season for salmonids (1<sup>st</sup> July – 30<sup>th</sup> September) of each year. A method statement for all riparian / in-stream works must first be submitted to IFI for approval.

If stream diversions are necessary, electrofishing to remove fish from channel 'pre-diversion' may be required. If these works are carried out by a consultant, then a Section 14 licence will be required from the Inland Fisheries Section of the Department of Climate, Energy and Environment.

Comprehensive surface water management measures must be implemented at the construction stage to prevent any pollution of streams in the area. On-site attenuation ponds may be required to allow for the settlement of fine/particulate materials out of potentially discharging surface waters from works areas. Precautions must be taken to ensure there is no entry of solids, during the connection of pipe-work, to the existing surface water system. The parameters set out in The European Communities (Quality of Salmonid Waters) Regulations of 1988 (S. I. No. 293, 1988) serve as a guide as to acceptable water quality conditions in salmonid systems.

Good housekeeping measures are integral to achieving prevention of excessive turbid run-off to surface water systems. The final Construction Environmental Management plan for the project shall be agreed with IFI in advance of works



**Iascach Intíre Éireann  
Inland Fisheries Ireland**

commencing. The short-term storage and removal / disposal of excavated material must be considered and planned such that risk of pollution from these activities is minimised. Any channel / riparian areas that are impacted through implementation of the scheme must be fully reinstated subsequent to infrastructural development.

In relation to the testing and commissioning of pipes IFI has concerns over the filling of pipes from local watercourses and discharging of these waters following testing. This also has potential to be a cross-catchment transfer of waters. IFI notes that there are a number of proposed wash-out valves along the pipeline, IFI is concerned about the potential for pollution or leakage from these pipelines during testing and commissioning. It is noted that there is no significant dewatering expected. Should dewatering be required consideration must be given to methodology and the dewatering of any pipes/excavations which may contain directional drilling and water treatment chemicals and the associated and risk of pollution. Consultation and agreement of method statements will be required with IFI.

Inland Fisheries Ireland welcome the commitment given by Uisce Éireann to support future enhancement/rehabilitation works at crossing locations, with multiple sites identified within by IFI. IFI believe that the project should maximise all opportunities for environmental gain during the planning and construction of the project. Previous consultation has been undertaken with IFI on watercourse crossings and this should continue as the project progresses.



**Iascach Intíre Éireann  
Inland Fisheries Ireland**

Inland Fisheries Ireland are available for and will welcome further consultation and engagement for the duration of the project. Please do not hesitate to contact the undersigned should you require any clarification or have any queries. Any correspondence should be addressed to each of the undersigned.

Yours sincerely,

*Catherine E Kerins*

**Catherine Kerins**

Senior Fisheries Environmental Officer

c/o Inland Fisheries Ireland, Shannon River Basin District  
Ashbourne Business Park, Dock Road. Limerick V94 NPE0

**Roisin O'Callaghan, Matt Carroll**

Senior/Fisheries Environmental Officers

Inland Fisheries Ireland, Eastern River Basin District  
3044 Lake Drive, Citywest Business Campus. Dublin D24 CK66

**Donnachadh Byrne**

Senior Fisheries Environmental Officer

Inland Fisheries Ireland, South-Eastern River Basin District  
Anglesea Street, Clonmel, Co. Tipperary E91 RD25