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Copy of Natural Capital Ireland response to Environmental Protection Agency (EPA) Ireland public consultation on the assessment methodology and hydrological limits on the EPA approach to determining whether a water abstraction is significant.

The EPA Public consultation on the proposed methodology to assess the impact of abstractions on waterbodies and identify significant abstractions in Ireland.

EPA Public Consultation Published on 14th of March 2025, NCI responded by email on 23rd of March 2025 to edenabstractionsupport@epa.ie .

Submissions closed 28th of March 2025

Link to consultation page:

[Significant Abstraction Guidance 2025 | Environmental Protection Agency](#)

Natural Capital Ireland are broadly in support of the submission and wish to raise these matters.

Thank you for the opportunity to respond to this request for views on implementing a licensing regime for water abstractions equal to or greater than 2,000 m³/day which will require an abstraction licence.

With increasing pressure to meet the current demand for water as a result of population growth, climate change, and our changing environmental regulations, it is essential that we plan ahead in a manner that enables Ireland to move towards safe, secure, reliable, and sustainable public water supplies for all of our customers and communities, whilst safeguarding public health and the environment safeguarding Ireland's precious water resources.

How is the volume of water that can be sustainably abstracted actually determined?

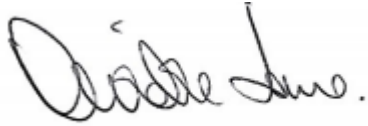
This should also consider the specific location of the lower flows caused by the abstraction as well as / instead of just a % of the length. The actual reach/es impacted will be more or less impacted depending on their channel shape, structure, sediment type, habitats present etc., just assessing the % impacted is not adequate in NCI's view..

How will the ecological impact (not just on fish) of these abstractions be monitored and assessed? In particular in the case of small streams, the ecological impact of abstractions in these streams is significant and as they feed our larger streams and rivers with macro invertebrates in particular vital to healthy river systems/landscapes. The bigger picture vision on availability of food for birds, small

mammals etc. is needed on abstractions.

Natural Capital Ireland welcomes any discussion on any of the points raised in this letter.

Yours sincerely

A handwritten signature in black ink, appearing to read "Deirdre Lane". The signature is written in a cursive style with a large initial 'D' and a long horizontal stroke at the end.

Deirdre Lane

Executive Coordinator