



Response from Ulster Wildlife to the Department for Infrastructure Budget 2023-24 Equality Impact Assessment

Ulster Wildlife is Northern Ireland's largest local nature conservation charity with over 14,000 members. Our vision is a wilder future where people and nature are thriving together. Our purpose is to protect and restore nature on land and at sea and we will play our part in ending the climate and ecological emergencies, creating a society where nature is valued and is part of our daily lives.

We welcome the opportunity to respond to the Department for Infrastructure's Budget 2023-24 Equality Impact Assessment.

While we are mindful of the current budgetary pressures on the Department, we are strongly opposed to the proposal to reduce and/or cease wastewater treatment. There are legal obligations to maintain good water quality. At present, neither our fresh water nor marine water bodies are achieving Good Environmental Status¹. Clean freshwater and marine waters are the basis for healthy ecosystems, providing habitats for wildlife and a place for people to relax and enjoy the outdoors. They also provide an essential service to our economy – drinking water, sanitation, agriculture, aquaculture, fishing, tourism and recreation. Polluted waters, on the other hand, lead to the loss of the above-mentioned services that healthy ecosystems provide, including recreational areas and services, increased costs of water treatment and damage to agricultural systems. Most of our towns have rivers at their heart, or are located in coastal areas. Living and working near a polluted watercourse means that people are subjected to unpleasant odours and

¹<https://www.daerani.gov.uk/sites/default/files/publications/daera/NI%20Water%20Framework%20Directive%20Statistics%20Report%202021.pdf>

dirty water and cannot use that watercourse, lake or beach for fishing, swimming or other water-related activities. A report by Professor Chris Whitty, chief Medical Officer, Jonson Cox, Ofwat Chair and Emma Howard Boyd, Environment Agency Chair, published last summer, provided an opinion on the problems of sewage in water, and stating that the discharge of waste containing viable human coliforms is a serious public health issue for government which can in particular affect children who may be swimming in or playing near water and 'wild swimmers' who are bathing in rivers, lakes and coastal waters to improve their mental and physical health².

Importance of clean water

In the consultation document, the Department states that:

"Having access to good water and wastewater infrastructure is essential for citizens across Northern Ireland who need a reliable supply of clean and safe drinking water and to be able to live and work in areas where flood risk is appropriately managed."

"Manufacturing, farming, tourism and recreation need fit for purpose water and wastewater infrastructure to operate and grow and our homes, schools, hospitals and businesses need this to function properly and more sustainably. The Department is responsible for water, wastewater and drainage policy across Northern Ireland as well as the sponsorship of Northern Ireland Water (NIW)."

These statements demonstrate and indeed state that a good water and wastewater infrastructure is essential. By suggesting that wastewater can simply be discharged with little or no treatment, totally undermines the Department's own position.

Northern Ireland is home to 21 lakes, 450 rivers, 25 transitional and marine and 75 groundwater bodies, with interconnections between marine and freshwater bodies. Degradation in river systems will have implications for the health of our oceans³. In 2021, a statistics report by the Water Framework Directive showed that none of Northern Ireland's

² <https://www.gov.uk/government/news/sewage-in-water-a-growing-public-health-problem>

³ <https://www.daerani.gov.uk/sites/default/files/publications/daera/NI%20Water%20Framework%20Directive%20Statistics%20Report%202021.pdf>

rivers, lakes and coastal waters reached a 'good overall status' for water quality.

Our local seas sustain 50% of all NI biodiversity and provide a myriad of services such as food provision, carbon sequestration and recreational benefits⁴.

Many of our priority species – those species that require conservation measures because of their rarity, decline and importance in a UK and all-Ireland context - are totally dependent upon clean freshwater and/or coastal waters. Allowing untreated waste-water freely reach our waterways, would further undermine these commitments and efforts we have under the Water Framework Directive, including projects funded by NI Public Bodies. Public funding would have to be made available to offset the effects caused by the actions of one department where it adversely affects the duties of another department. It would also result in double standards being applied to public bodies and private business, weakening Government's ability and credibility to govern water quality issues as a significant and increasing contributor to the problems.

Public Health

Clean water is essential for human health. These water bodies provide us with many services, not least of all, our drinking water. To take just one example, the largest source of drinking water in Northern Ireland is Lough Neagh, which supplies around 40% of the population. Lough Neagh is a Ramsar site⁵, Special Protection Area⁶ and an Area of Special Scientific Interest⁷, making it one of our most designated and important areas for nature conservation. Even without this current proposal to cease or reduce wastewater treatment, approximately 200,000 tonnes of sewage are discharged into the Lough Neagh catchment each year⁸. Lough Neagh is fed by 6 main rivers and the catchment drains over 40% of NI's land area. Should wastewater treatment operations be reduced or ceased altogether, Lough Neagh as a source of water will be seriously

⁴ <https://www.afbini.gov.uk/sites/afbini.gov.uk/files/publications/%5Bcurrent-domain%3Amachine-name%5D/marine%20biodiversity.pdf>

⁵ <https://www.daera-ni.gov.uk/protected-areas/lough-neagh-assi>

⁶ <https://www.daera-ni.gov.uk/protected-areas/lough-neagh-and-lough-beg-ramsar-0>

⁷ <https://www.daera-ni.gov.uk/protected-areas/lough-neagh-and-lough-beg-spa>

⁸ <dp1725.pdf> (niassembly.gov.uk).

compromised, leading to increased costs of water treatment. Hypertrophic waters will lead to increased algal blooms, which will add cost to the processes of abstraction and treatment of drinking water. We believe that it is a false economy to allow this to happen and the costs are not solely financial in terms of Government budgets. Future generations will require an adequate supply of clean water and the impact of not treating waste water will have long term impacts which will be aggravated with climate change and reduced rainfall as temperatures continue to rise and more extreme weather events increase. Reducing wastewater treatment will add greatly to the existing nutrient burden of our lakes and rivers, damaging fragile and vulnerable ecosystems, habitats and species to such an extent that they may not ever be able to recover.

In recent years, there have been increased incidents involving toxic blue-green algae, leading to the death of pets and causing skin problems and illness to the human population. These are real and present threats and will be made so much worse if the Department's suggested cuts go ahead.

Nature-based Solutions

Using technology and hard infrastructure to treat wastewater is not the only solution. It is possible to work with nature to make use of ecosystem services. These include flood management and constructed wetlands for wastewater management. Ocean ecosystems and habitats such as kelp beds and seagrasses are important for carbon sequestration and mitigate the effects of climate change. They can be negatively impacted by pollution⁹. Investment in nature-based solutions such as native oysters that absorb nutrients and filter water should be considered as a long term sustainable tool. Working with nature and not against it could ease budgetary pressures and be a win-win situation.

Many large scale projects, employing Nature Based Solutions have taken place in recent years to restore the water quality in our freshwater and marine environments. One example is CatchmentCARE – Community

9

<https://www.afbini.gov.uk/sites/afbini.gov.uk/files/publications/RePhoKUs%20report%20October%202020x.pdf>

Actions for resilient Ecosystems¹⁰. The aim of this project was to establish 3 water quality improvement projects in the Finn, Arney and Blackwater catchments.

The costs of reducing wastewater treatment

Ceasing or reducing the treatment of wastewater will undermine all the work that has been done by Government, environmental NGOs, community groups and organisations and angling clubs. These proposals would see the percentage population estimated by NI Water being served by compliant WwTW, decrease from 99.23% to around 25%¹¹. It will adversely affect the local economy, in particular agri-food, commercial fishing and tourism and will make areas close to waterbodies become unpleasant and unhealthy places to live, work and play. In July and August this year, some of our most popular bathing beaches have had to close due to E.coli levels above what is deemed to be safe¹² and also due to the presence of toxic blue-green algae¹³. A reduction in wastewater treatment will likely make this a much more regular occurrence, leading to health scares and loss of reputation of Northern Ireland as a clean, safe place for residents and visitors. There are significant health risks when waterbodies are polluted with sewage. The most vulnerable people in our society such as those with a disability or elderly people are likely to be more seriously impacted.

From an economic point of view, there is a high risk that if a waterway is polluted due to lack of wastewater treatment, the Department is creating a liability for itself in that angling clubs and owners of fish farms and aquaculture businesses could take legal action against the Department to recoup cost of lost business. This could potentially cancel out any savings. Many of our freshwater bodies are used to water livestock. The presence of toxic chemicals and pathogenic bacteria could cause health problems or fatalities in these animals. Increases in E. coli and could destroy NI's shellfish industry, as safe levels of E.coli will be breached. The Water (Northern Ireland) Order 1999, states that it is an offence to cause pollution of a waterway or groundwater. In addition, the Water Environment (Water Framework Directive) Regulations (Northern Ireland)

¹⁰ <https://catchmentcare.eu/>

¹¹ <https://www.infrastructure-ni.gov.uk/sites/default/files/publications/infrastructure/s75-screening-cessation-of-wastewater-treatment-final-22-may-23.pdf>

¹² [Sea swimmers told to stay out of the water at some north Down beaches - BBC News](#)

¹³ [Blue-Green Algae | Department of Agriculture, Environment and Rural Affairs \(daera-ni.gov.uk\)](#)

2017 aims to achieve a good status for all water bodies by 2027¹⁴. It is highly possible that increased release of untreated sewage into our waters will be a breach of this legislation and will make the target more difficult to attain, especially given that none of our water bodies can be considered in good health under the WFD. The Office for Environmental Protection will monitor the Department for Infrastructure and NI Water in relation to water quality.

Some of our waterways flow cross border into the Republic of Ireland, for example the Fane River. It is unlikely that the Irish Government will tolerate excess sewage brought in by watercourses originating in Northern Ireland and this could also lead to legal challenges. Effectively it would be non-compliance with the UK's commitment of no regression during the EU Exit Agreement.

Summary

Ulster Wildlife would urge the Department not to go ahead with this proposal. With all the potential costs, financial and otherwise, it will not improve the lives of people in Northern Ireland and will set us back many decades in terms of having water in good condition. In Northern Ireland, 42% of the public view pollution as the greatest threat to biodiversity¹⁵. The proposal will disproportionately affect the most vulnerable in our society, such as people with a disability, elderly people and children, all of whom require clean, safe water.

Ceasing or reducing waste water treatment is neither a viable or acceptable option for reducing the budgetary deficit and we hope that this proposal is taken off the table. We would urge the Department to consider the need for NI Water to develop a long-term investment plan, including a greater emphasis on nature-based solutions which can be cost effective and would benefit biodiversity.

¹⁴ [Northern Ireland Water Framework Directive Statistics 2021 \(daera-ni.gov.uk\)](https://www.daera-ni.gov.uk/sites/default/files/publications/daera-ni-environmental-statistics-report-2023.pdf)

¹⁵ <https://www.daera-ni.gov.uk/sites/default/files/publications/daera-ni-environmental-statistics-report-2023.pdf>