OFFICE OF CLIMATE, LICENSING, RESOURCES & RESEARCH

INSPECTORS REPORT ON A WASTE WATER DISCHARGE LICENCE APPLICATION

To: Dara Lynott, Director
From: Yvonne English Environmental Licensing Programme
Date: 11/12/2015

RE: Application for a Waste Water Discharge Licence from Irish Water, for the agglomeration named Newmarket on Fergus, Reg. No. D0079-01.

<table>
<thead>
<tr>
<th>Application &amp; Agglomeration Details</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Agglomeration Name:</strong></td>
</tr>
<tr>
<td><strong>County:</strong></td>
</tr>
<tr>
<td><strong>Schedule of discharge licensed:</strong></td>
</tr>
<tr>
<td><strong>Licence application received:</strong></td>
</tr>
<tr>
<td><strong>Notices under Regulation 18(3)(b)(^1) issued:</strong></td>
</tr>
<tr>
<td><strong>Information under Regulation 18(3)(b) received:</strong></td>
</tr>
<tr>
<td><strong>Site notice check:</strong></td>
</tr>
<tr>
<td><strong>Site Visit:</strong></td>
</tr>
<tr>
<td><strong>Submission(s) Received:</strong></td>
</tr>
<tr>
<td><strong>Design Population Equivalent:</strong></td>
</tr>
<tr>
<td><strong>Actual Population Equivalent:</strong></td>
</tr>
<tr>
<td><strong>Type of treatment:</strong></td>
</tr>
<tr>
<td><strong>Wastewater treatment plant (WWTP) description:</strong></td>
</tr>
</tbody>
</table>

\(^1\) Waste Water Discharge (Authorisation) Regulations, 2007, as amended.
1. Discharges to waters
The following table outlines the main considerations in relation to discharges to waters from this agglomeration.

Table 1: Discharges to waters

<table>
<thead>
<tr>
<th>Primary discharge point</th>
</tr>
</thead>
<tbody>
<tr>
<td>Receiving water name</td>
</tr>
<tr>
<td>Type of receiving water</td>
</tr>
<tr>
<td>Normal flow</td>
</tr>
<tr>
<td>Maximum flow</td>
</tr>
<tr>
<td>Storm water overflow(s)</td>
</tr>
<tr>
<td>Receiving water name(s)</td>
</tr>
</tbody>
</table>

The primary discharge from the Newmarket on Fergus WWTP discharges into the Boheraroan Stream. The Boheraroan Stream then flows into Lough Gash Turlough approximately 25 meters downstream of the primary discharge location.

Schedule A: Discharges & Discharge Monitoring of the recommended licence (RL) specifies the Emission Limit Values (ELVs) to which the discharge from the Newmarket on Fergus agglomeration must conform. Monitoring of the discharges will take place as per this schedule of the RL.

There is a large variation noted between the normal and maximum flows recorded from the primary discharge point. This variation can be attributed to the combined nature of the collection network.

2. Receiving waters and impact
The following table summarises the main considerations in relation to the Boheraroan Stream and Lough Gash Turlough downstream of the primary discharge.

Table 2: Receiving waters

<table>
<thead>
<tr>
<th>Characteristic</th>
<th>Classification</th>
<th>Comment</th>
</tr>
</thead>
<tbody>
<tr>
<td>Receiving water name</td>
<td>Boheraroan Stream</td>
<td>(WFD Code: IE_SH_27B670560)</td>
</tr>
<tr>
<td></td>
<td>GWDTE_Lough Gash Turlough</td>
<td>(WFD Code: IE_SH_G_259)</td>
</tr>
<tr>
<td></td>
<td>(SAC000051)</td>
<td></td>
</tr>
<tr>
<td>Designations</td>
<td>Lough Gash Turlough</td>
<td>SAC (Site code: 000051)</td>
</tr>
<tr>
<td></td>
<td>Lower River Shannon</td>
<td>SAC (Site Code: 002165)</td>
</tr>
<tr>
<td></td>
<td>River Shannon &amp; River Fergus Estuaries</td>
<td>SPA (SiteCode: 004077)</td>
</tr>
<tr>
<td>Receiving water monitoring stations</td>
<td>No monitoring stations on the Boheraroan Stream, upstream or downstream of the discharge, or after the turlough.</td>
<td></td>
</tr>
<tr>
<td>Biological quality</td>
<td>No Q-values on the Boheraroan Stream. The Fergus Estuary, into</td>
<td></td>
</tr>
</tbody>
</table>

² Also referred to as the Mill Stream.
³ Average flow based on flow results submitted to Office of Environmental Enforcement for 2013.
The Fergus Water Management Unit Action Plan (WMUAP) identifies the WWTP in Newmarket on Fergus as a point pressure on the Fergus catchment. The discharge from the Newmarket on Fergus agglomeration discharges into the Boheraroan Stream, which subsequently flows into the Lough Gash Turlough 25 meters downstream of the discharge point. Following consultation with the Office of Environmental Assessment and the Hydrometrics Team it was determined that the Boheraroan Stream loses its flow to groundwater all the way to the Fergus Estuary (approximately 4.5 km downstream). Therefore, the effluent discharge from the Newmarket on Fergus WWTP is considered a direct discharge to groundwater.

The receiving groundwater body for the agglomeration is the Kilkishen groundwater body. The Kilkishen groundwater body is a locally important aquifer, which is generally moderately productive and has extreme vulnerability. The aquifer is karstified and therefore little attenuation of pollutants will occur in the bedrock.

As mentioned above the effluent discharge from the Newmarket on Fergus WWTP is considered a direct discharge to groundwater. Direct discharges to groundwater are prohibited under Regulation 8 of the European Communities Environment Protection (Groundwater) Regulations (S.I. 9 of 2010) as amended, and under Article 11.3(j) of the European Commission Water Framework Directive (2000/60/EC).

However, certain types of direct discharges may be permissible subject to a requirement of prior authorisation as outlined in the Regulations. Regulation 8 does not make specific reference to direct discharges of wastewater effluents. Under Regulation 14 of S.I. 9 of 2010 as amended, certain direct and indirect discharges to groundwater may be granted exemptions from measures to prevent or limit the input of pollutants into groundwater, under conditions (technical rules) established by the EPA. However, the applicant has not sought authorisation to continue the existing direct discharge to groundwater.

The Agency requested that the applicant evaluate the direct discharges to groundwater from the Newmarket on Fergus agglomeration in accordance with Agency guidance (‘Guidance on the Authorisation of Direct Discharges to Groundwater’, 2014 and ‘Guidance on the Authorisation of Discharges to Groundwater’, 2011). This information was not submitted in accordance with the guidance.

The Newmarket on Fergus WWTP was constructed in the 1980’s and was subsequently upgraded in 2010 to treat a population equivalent of 5,000. The current population equivalent being treated at the plant is approximately 3,500. The plant produces good quality effluent, however, due to the potential risk being posed by the discharge to groundwater, Condition 3.7 of the Recommended Licence requires that the existing discharges, directly to groundwater, from the agglomeration cease by 31st December 2019.

---

4 An initial status of High was assigned from a donor waterbody in 2005, but this status was assigned with low confidence at the time. There has been no monitoring at the donor waterbody since 2005 to confirm continuing high status and as such the Office of Environmental Assessment recommended that the WFD status remain as unassigned.
The licensee is required in the interim period to investigate alternative means of disposal of the treated effluent from the agglomeration. Prior to commencement of an alternative discharge, as proposed, Irish Water shall apply for a review of the Waste Water Discharge Licence.

The WWTP serving the Newmarket on Fergus agglomeration currently provides tertiary treatment including phosphorus removal. As mentioned above, Condition 3.7 of the RL requires the existing discharges from the Newmarket on Fergus agglomeration to cease as soon as practicable and no later than 31st December 2019.

In line with the requirements of the Urban Wastewater Treatment Directive, the RL sets Emission Limit Values (ELVs) of 125mg/l for Chemical Oxygen Demand (COD), 25mg/l for carbonaceous Biochemical Oxygen Demand (cBOD) and 35mg/l for suspended solids (SS) which will apply from date of issue of licence.

Under the requirements of the Water Framework Directive, the Boheraroan Stream (IE_SH_27B670560) must achieve High status by 2009 and the GWDTE_Lough Gash Turlough (SAC000051) groundwater body (IE_SH_G_259) must be restored to Good Status by 2021.

As discharges from the Newmarket on Fergus agglomeration must cease no later than 31st December 2019 and the Licensee is required to apply for a review of the licence prior to commencement of an alternative discharge on or before 1st January 2020, ELVs have not been recommended for Orthophosphate or Ammonia at this time and will be determined as part of the review process.

3. Ambient Monitoring

Schedule B: Ambient Monitoring of the RL specifies the parameters, analysis method and frequency for which ambient monitoring of the primary discharge shall be carried out. The requirements for ambient monitoring in Schedule B: Ambient Monitoring are sufficient to monitor for potential impacts on the status of the receiving water as a result of the discharge.

4. Combined Approach

The Waste Water Discharge (Authorisation) Regulations, 2007, as amended, specify that a ‘combined approach’ in relation to licensing of waste water works must be taken, whereby the emission limits for the discharge are established on the basis of the stricter of either or both, the limits and controls required under the Urban Waste Water Treatment Regulations, 2001, as amended, and the limits determined under statute or Directive for the purpose of achieving the environmental objectives established for surface waters, groundwater or protected areas for the water body into which the discharge is made. The RL as drafted gives effect to the principle of the Combined Approach as defined in Waste Water Discharge (Authorisation) Regulations, 2007, as amended.

5. Programme of Improvements

As stated above, the RL requires that the existing discharges from the agglomeration cease by 31st December 2019 and prior to the commencement of an alternative discharge, the licensee shall apply for a review of the licence.

In the interim, condition 5.1 of the RL requires the licensee to prepare and submit to the Agency a programme of infrastructural improvements to maximise the effectiveness and efficiency of the waste water works.

The conditions and emission limit values specified in the RL will ensure no deterioration in the quality of the receiving waters as a result of the discharge.
6. **Compliance with EU Directives**

In considering the application, regard was had to the requirements of Regulation 6(2) of the Waste Water Discharge (Authorisation) Regulations, 2007, as amended, notably:

<table>
<thead>
<tr>
<th>Compliance with Directives/Regulations</th>
<th>Description and Conditions in RL</th>
</tr>
</thead>
<tbody>
<tr>
<td>Water Framework Directive [2000/60/EC]</td>
<td></td>
</tr>
</tbody>
</table>
  - Good status to be protected/achieved by 2015/2021/2027
  - Boheraroan Stream - High status to be achieved by 2009
  - Gash Turlough (SAC000051) groundwater body - Good status by 2021 |
| EC Environmental Objectives (Surface Water) Regulations 2009 (S.I. No. 272 of 2009), as amended | Schedule A of RL sets ELVs to contribute towards achieving the environmental quality objectives. |
| Drinking Water Abstraction Regulations | There are no drinking water abstractions downstream. |
| Bathing Water Directive [2006/7/EC] | No bathing waters present |
| Environmental Impact Assessment Directive [85/337/EEC] | An EIS was not required for the Newmarket on Fergus WWTP. |


The Newmarket on Fergus WWTP discharges directly into the Lough Gash Turlough SAC (Site code: 000051) and the Newmarket on Fergus WWTP discharges indirectly via the Boheraroan Stream into the Lower River Shannon SAC (Site code: 002165). These sites are protected for priority habitats listed under Annex 1 of the Habitats Directive. The Lower River Shannon SAC is also selected for protection of species listed under Annex II of the same directive. The River Shannon and River Fergus Estuaries SPA (Site code: 004077) site is also designated an SPA under the Birds Directive for the conservation of wild birds.

A screening for Appropriate Assessment was undertaken to assess, in view of best scientific knowledge and the conservation objectives of the site, if the activity, individually or in combination with other plans or projects is likely to have a significant effect on any European Site. In this context, particular attention was paid to the European Site(s) at Lough Gash Turlough SAC, Lower River Shannon SAC, River Shannon and River Fergus Estuaries SPA.

The activity is not directly connected with or necessary to the management of any European Site and the Agency considered, for the reasons set out below, that it cannot be excluded, on the basis of objective information, that the activity individually or in combination with other plans or projects, will have a significant effect on any European Site and accordingly determined that an Appropriate Assessment of the activity was required, and for this reason determined to require the applicant to submit a Natura Impact Statement.
This determination is based on the limited availability of ambient monitoring information available to demonstrate any impacts that the discharge may have on the European sites.

An Inspector’s Appropriate Assessment has been completed and has determined, based on best scientific knowledge in the field and in accordance with the European Communities (Birds and Natural Habitats) Regulations 2011 as amended, pursuant to Article 6(3) of the Habitats Directive, that the activity, individually or in combination with other plans or projects, will not adversely affect the integrity of any European Site, in particular Lough Gash Turlough SAC, Lower River Shannon SAC, River Shannon and River Fergus Estuaries SPA, having regard to their conservation objectives and will not affect the preservation of these sites at favourable conservation status if carried out in accordance with this Recommended Licence and the conditions attached hereto for the following reasons:

- The RL requires that the direct discharge to groundwater cease by 31st December 2019. In the interim, in line with the requirements of the Urban Wastewater Treatment Directive, the RL sets Emission Limit Values (ELVs) of 125mg/l for COD, 25mg/l for cBOD and 35mg/l for SS which will apply from date of issue of licence.
- The RL requires that within six months of date of grant of the licence that a technical assessment is required for the proposed primary discharge point. Where applicable, the technical assessment shall be carried out in accordance with the Guidance on the Authorisation of Discharges to Groundwater, published by the Environmental Protection Agency, to demonstrate compliance with the European Communities Environmental Objectives (Groundwater) Regulations 2010, as amended, and the European Communities Environmental Objectives (Surface Waters) Regulations 2009 as amended.
- Condition 3.3 of the RL requires the licensee to take such measures as necessary to ensure that no deterioration in the quality of the receiving waters shall occur as a result of the discharge.

In light of the foregoing reasons no reasonable scientific doubt remains as to the absence of adverse effects on the integrity of those European sites Lough Gash Turlough SAC, Lower River Shannon SAC, River Shannon and River Fergus Estuaries SPA.

7. Cross Office Liaison
Advice and guidance issued by the Waste Water Technical Working Group (WWTWG) was followed in the assessment of this application. Advice and guidance issued by the WWTWG is prepared through a detailed cross-office co-operative process, with the concerns of all sides taken into account. The Board of the Agency has endorsed the advice and guidance issued by the WWTWG for use by licensing inspectors in the assessment of wastewater discharge licence applications.

8. Submissions
One (1 no.) submission was received in relation to this licence. The issues raised in the submission are summarised below. However, the original submission should be referred to at all times for greater detail and expansion of particular points.

Mr Andrew Jackson made a written submission to the Agency on behalf of An Taisce – the National Trust for Ireland on 4th June 2014. The submission highlighted that the discharge from the Newmarket on Fergus agglomeration is discharging into Lough Gash Turlough, priority habitat SAC.
The submission requested confirmation that the application would be subject to appropriate assessment under the Habitats Directive and sought confirmation of compliance with Ireland’s obligations under Article 6(2) of the Habitats Directive. Mr Jackson noted that Regulation 27(3) of S.I. No. 47 of 2011 obliges the EPA to take action – “Public authorities, in the exercise of their functions, including consent functions, shall take the appropriate steps to avoid, in European Sites, the deterioration of natural habitats.”

Mr Jackson further noted that continuous discharge of sewage effluent to the turlough clearly results in a deterioration of the turlough habitat and that the EPA’s lengthy delay in making a decision on the licence application, and its failure to take action under Article 6(2) of the Habitats Directive and Regulation 27(3) of the Habitats Regulations, means that the deterioration continues, in breach of Irish and EU law. The final point of the submission requests that the EPA clarify the potential human health implications of this sewage effluent discharge.

**Response**

The Agency is clear on its responsibilities under the Habitats Directive and the European Communities (Birds and Natural Habitats) Regulations 2011 as amended. The Agency has undertaken a full Appropriate Assessment, details of which can be seen above.

The requirements specified in the RL are such that the direct discharge to groundwater cease and that the licensee shall be required to take such measures as are necessary to ensure that no deterioration in the quality of the receiving waters shall occur as a result of the discharge. These requirements will ensure that the requirements of Article 6(2) of the Habitats Regulations are met.

In relation to the delay in processing the WWDL application for Newmarket on Fergus, it is noted that a recommendation is now being made for the Newmarket on Fergus agglomeration. The Recommended Licence requires that the existing discharges, directly to groundwater, from the agglomeration cease by 31\(^{st}\) December 2019. Prior to commencement of an alternative discharge, Irish Water shall apply for a review of this Licence.

Regarding the concern in relation to the potential human health implications of this sewage effluent discharge, Condition 4.17 of the RL, as drafted, requires the licensee to prepare a risk assessment for the protection of downgradient water abstraction points.

**9. Charges**

The RL sets an annual charge for the agglomeration at €1,827.09 and is reflective of the monitoring and enforcement regime being proposed for the agglomeration.

**10. Recommendation**

I recommend that a Final Licence be issued subject to the conditions and for the reasons as set out in the attached Recommended Licence.
Signed

Yvonne English

Environmental Licensing Programme
Appendix 1: Map showing location of Newmarket on Fergus WWTP and associated primary discharge point.
Appendix 2: Map showing location of Newmarket on Fergus WWTP and European Sites in the vicinity of the WWTP.

- Lower River Shannon SAC (red stripes)
- River Shannon & River Fergus Estuaries SPA (yellow)
- Lough Gash Turlough SAC
- Mill Stream (Boheraroan Stream)
- WWTP & discharges
### Appendix 3: Assessment of the effect of discharges on European sites and proposed mitigate measures

<table>
<thead>
<tr>
<th>European Site (site code):</th>
<th>Lough Gash Turlough SAC (000051)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Distance/ Direction from discharge(s)</td>
<td>The primary discharges directly into Lough Gash Turlough SAC.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Qualifying interests (* denotes a priority habitat)</th>
<th>Assessment</th>
</tr>
</thead>
</table>
| **Habitats: Water Dependent Turloughs** | **Emission to Water**
Discharge of effluent to water systems can lead to an altered nutrient balance (eutrophication), potential threat of toxicity, reduction in biological status and loss of habitat. Compliance with Environmental Quality Standards for surface water and groundwater will contribute to the maintenance of favourable conservation status.

**Conclusion:**
The RL specifies ELVs for the primary discharge which are set to ensure that emissions from this source will protect the quality of the receiving waters, to comply with the requirements of the European Communities Environmental Objectives (Surface Water) Regulations, 2009, as amended. The ELVs specified will also contribute to the receiving waters achieving ‘good’ status as required under the Water Framework Directive. Condition 3.3 of the RL requires the licensee to take such measures as necessary to ensure that no deterioration in the quality of the receiving waters shall occur as a result of the discharge.

**Potential for Accidents to Arise**
There is the potential for accidents and emergency situations arising at a waste water works resulting in partially treated or untreated waste waters discharging to the receiving waters. Such incidents or events could lead to the breach of ELVs and the discharge of elevated levels of polluting organic matter, which would have the potential to impact on the receiving water environment.

**Conclusion:**
Condition 5.1.6 of the RL requires the licensee to identify measures to minimise any environmental damage associated with discharges or overflows from the waste water works following anticipated events or accidents/incidents. Condition 4.20 of the RL requires the licensee to provide an annual statement as to the measures taken or adopted to minimise environmental damage associated with discharges or overflows from the waste water works following anticipated events or accidents/incidents.
**European Site (site code):** Lower River Shannon SAC (002165)

**Distance/ Direction from discharge(s):** Lower River Shannon SAC is approx. 4.5 km downstream from the primary discharge point.


### Qualifying interests

(* denotes a priority habitat)

#### Habitats:

**Water Dependent**
- Estuaries, Mudflats and sandflats not covered by seawater at low tide, *Coastal lagoons, Reefs, Water courses of plain to montane levels with the Ranunculion fluitantis and Callitricho-Batrachion vegetation, Atlantic salt meadows (Glaucopuccinellietalia maritae), Mediterranean salt meadows (Juncetalia maritimi), Sandbanks which are slightly covered by sea water all the time, Large shallow inlets and bays, Vegetated sea cliffs of the Atlantic and Baltic coasts, Perennial vegetation of stony banks, Salicornia and other annuals colonizing mud and sand, *Alluvial forests with Alnus glutinosa and Fraxinus excelsior (Alno-Padion, Alnion incanae, Salicion albae)

**Non water Dependent**
- Molinia meadows on calcareous, peaty or clayey-silt-laden soils (Molinion caeruleae)

#### Species:

**Water Dependent**
- Freshwater Pearl Mussel Margaritifera margaritifera, Sea Lamprey Petromyzon marinus, Brook Lamprey Lampetra planeri, River Lamprey Lampetra fluviatilis, Atlantic Salmon Salmo salar, Bottlenose Dolphin Tursiops truncates, Otter Lutra lutra

### Assessment

**Emission to Water**
The sediment of intertidal systems are usually deposited in estuaries and the water dependent habitats listed. This sediment is often rich in nutrients and has the potential to impact on the receiving water quality. Any change in water quality has the potential to impact the qualifying interests. Maintenance of habitat area and its distribution subject to natural processes will ensure maintenance of favourable conservation status.

**Conclusion:**
The RL specifies ELVs for the primary discharge which are set to ensure that emissions from this source will protect the quality of the receiving waters, to comply with the requirements of the *European Communities Environmental Objectives (Surface Water) Regulations, 2009, as amended*. The ELVs specified will also contribute to the receiving waters achieving ‘good’ status as required under the Water Framework Directive. Condition 3.3 of the RL requires the licensee to take such measures as necessary to ensure that no deterioration in the quality of the receiving waters shall occur as a result of the discharge.

**Potential for Accidents to Arise**
There is the potential for accidents and emergency situations arising at a waste water works resulting in partially treated or untreated waste waters discharging to the receiving waters. Such incidents or events could lead to the breach of ELVs and the discharge of elevated levels of polluting organic matter, which would have the potential to impact on the receiving water environment.

**Conclusion:**
Condition 5.1.6 of the RL requires the licensee to identify measures to minimise any environmental damage associated with discharges or overflows from the waste water works following anticipated events or accidents/incidents. Condition 4.20 of the RL requires the licensee to provide an annual statement as to the measures taken or adopted to minimise environmental damage associated with discharges or overflows from the waste water works following anticipated events or accidents/incidents.
**European Site**

title: European Site (site code): River Shannon and River Fergus Estuaries SPA (004077)

**Distance/ Direction from discharge(s):**
River Shannon and River Fergus Estuaries SPA is approx. 4.5 km downstream from the primary discharge point.

**Conservation objectives:**

**Qualifying interests**
(* denotes a priority habitat)

<table>
<thead>
<tr>
<th>Habits:</th>
<th>Water Dependent Wetlands</th>
</tr>
</thead>
<tbody>
<tr>
<td>Species:</td>
<td>Cormorant Phalacrocorax carbo, Whooper Swan Cygnus Cygnus, Golden Plover Pluvialis apricaria, Light-bellied Brent Goose Branta bernica hrota, Shelduck Tadorna tadorna, Wigeon Anas Penelope, Teal Anas crecca, Pintail Anas acuta, Shoveler Anas clypeata, Scaup Aythya maria, Ringed Plover Charadrius hiaticula, Grey Plover Pluvialis squatarola, Lapwing Vanellus vanellus, Knot Calidris canutus, Dunlin Calidris alpine, Black-tailed Godwit Limosa limosa, Bar-tailed Godwit Limosa lapponica, Curlew Numenius arquata, Redshank Tringa tetanus, Greenshank Tringa nebularia, Black-headed Gull Chroicocephalus ridibundus</td>
</tr>
</tbody>
</table>

**Assessment**

**Emission to Water**
A change in water quality could adversely affect the habitats and availability of prey species of the water dependent birds listed in the qualifying interest column of this table.

**Conclusion:**
The RL specifies ELVs for the primary discharge which are set to ensure that emissions from this source will protect the quality of the receiving waters, to comply with the requirements of the European Communities Environmental Objectives (Surface Water) Regulations, 2009, as amended. The ELVs specified will also contribute to the receiving waters achieving ‘good’ status as required under the Water Framework Directive. Condition 3.3 of the RL requires the licensee to take such measures as necessary to ensure that no deterioration in the quality of the receiving waters shall occur as a result of the discharge.

**Potential for Accidents to Arise**
There is the potential for accidents and emergency situations arising at a waste water works resulting in partially treated or untreated waste waters discharging to the receiving waters. Such incidents or events could lead to the breach of ELVs and the discharge of elevated levels of polluting organic matter, which would have the potential to impact on the receiving water environment.

**Conclusion:**
Condition 5.1.6 of the RL requires the licensee to identify measures to minimise any environmental damage associated with discharges or overflows from the waste water works following anticipated events or accidents/incidents. Condition 4.20 of the RL requires the licensee to provide an annual statement as to the measures taken or adopted to minimise environmental damage associated with discharges or overflows from the waste water works following anticipated events or accidents/incidents.