

Mr Paddy Matthews
Head of Investment and Innovation
Wild Atlantic Way Operational Programme
Failte Ireland
88-95 Amiens Street
Dublin 1

27th April 2015

Our Ref: SCP131005.2

Re: Wild Atlantic Way Draft Operational Programme 2015 -2019 and associated Strategic Environmental Assessment Environmental Report

Dear Mr Matthews,

The Environmental Protection Agency (EPA) acknowledges your notice, dated 27/03/2015, regarding the *Wild Atlantic Way Draft Operational Programme 2015 -2019 including the associated Strategic Environmental Assessment Environmental Report and related documents* and we welcome the opportunity to inform the further development of the Programme.

Our initial preliminary observations in relation to the Programme and associated SEA Environmental Report are provided below. These initial observations focus primarily on the integration of environmental considerations into the Programme.

We also refer you to our previous submission on the Scoping Report on the 22nd November 2013, attached, which should be taken into account in finalising the Programme.

Draft Operational Programme

A commitment should be included in the Programme to undertake a formal review every 5 years. This commitment should take into account the requirements of the SEA and Habitats Directives.

Consideration should also be given also including Appendices 4-6 as a separate Volume to the Programme, for example entitled *Part II - Wild Atlantic Way Operational Programme -Environmental Monitoring and Management*.

The commitment in *Section 3.1 -Wild Atlantic Way Route and candidate Discovery Points- Action 1* to review the route of the Wild Atlantic Way by the end of 2017 provides a significant opportunity to take stock and review the evidence from the *Environmental Monitoring Strategy*. This is in the context of the role of the review in ensuring the selected route is sustainable from a community, tourism an environmental perspective. Defining the criteria which will determine those candidate Discovery Points which are to be retained, excluded or have a change in emphasis will be an important initial stage of the proposed Environmental Monitoring Programme (Action 44 and Appendix 4).

Implementation and Governance

The establishment of a *national Wild Atlantic Way Implementation Group* as provided for in *Section 3.5 Building Effective Partnerships - Action 45* is welcome. The proposed structure of this Implementation Group could be further expanded and strengthened by assigning a clear leadership and accountability role to Failte Ireland and where relevant its parent Department. The role of local authorities will be critical in committing to and addressing critical infrastructure deficits and county tourism initiatives and this should also be highlighted.

Key relevant other Departments and authorities should also be engaged in providing support and advice to Failte Ireland , its parent Department, regional assemblies and local authorities in the implementation of specific actions associated with the Programme.

There may be merit in considering a tiered approach to implementation and governance with a relatively small and focussed national coordination group at tier 1, ideally led by the Failte Ireland , and

accountable to Government for the implementation of the Programme; a broader consultative group at tier 2, along the lines of the proposed national Wild Atlantic Way Implementation Group led by Failte Ireland with Regional Assembly membership; and local consultative network and partnership groups at tier 3, ideally led by the relevant local authorities with local involvement of key relevant government and non-governmental organisations.

Specific time frames over which the Programme Actions will be implemented would also be desirable. There would be merits in considering the development of an implementation plan with clear responsibility and accountability for the 48 actions in the Programme and specific time scales for commencement, duration and delivery.

Promoting strong collaboration with key stakeholders including business and community networks as provided for in Action 46 and national and regional partnerships with relevant environmental and heritage bodies - (Action 47) will be critical to ensuring an integrated national coordinated approach to implementation of the Programme and protection of the environmental resources along the route.

The inclusion of a commitment to increasing awareness and understanding of these services by the public, landowners, and decision makers will promote a proactive approach to implementing evidence based best practice approaches to management of tourism along the Wild Atlantic Way and the associated wider regional catchments along the route.

Section 3.4 Environmental Management and Sustainability

The overall Strategy in relation to environmental considerations and the associated Actions are welcomed. These would, however, benefit from further development prior to finalising and implementation.

Action 44 - Environmental Surveying and Monitoring - (Also Action 35)

The *Draft Strategy for Environmental Surveying and Monitoring* in Appendix 4 should be aligned with, and reflect the relevant aspects of the proposed SEA related monitoring in Section 10 of the SEA Environmental Report (ER).

Failte Ireland should further develop the Monitoring Programme and agree on its implement in association with the key stakeholders, relevant local authorities, the Regional Assemblies and statutory environmental bodies.

The following aspects should be considered in further developing the Monitoring Programme;

- Frequency of Monitoring
- Geographical Scope of Monitoring
- Specific Parameters aspects to be monitored
- Reporting Arrangements and Frequency of Reporting
- Environmental Thresholds/ Criteria which will trigger remedial actions
- The nature of any follow up remedial actions for specific environmental aspects

Environmental monitoring and associated reporting should be linked with Programme related monitoring and there should be a clear line of responsibility and accountability. A Wild Atlantic Way Environmental Monitoring Steering Group should be established to finalise the Draft Strategy and take it forward to Implementation Stage.

The requirements for critical water related infrastructure to accommodate increased tourism related numbers should be reviewed on an on-going basis. This will ensure adequate and appropriate infrastructure- waste water treatment and drinking water supply will be maintained and will reduce the potential for environmental pollution associated with waste water related discharges. Failte Ireland should take into account obligations associated with the following Directives in consultation with the relevant local and statutory authorities -Water Framework Directive, Bathing Water Directive, Shellfish Water Directive and the Marine Strategy Framework Directive.

We welcome the commitment in under *Section 4.1 Action 41* to continuing to contribute to the Burren and Cliffs of Moher Geopark and Aran LIFE projects. The opportunities to incorporate best practice from these projects to other relevant geographical areas along the WAW route provides an on-going mechanism to improve the operation and implementation and monitoring of the Programme.

Action 47 advocating exploration of opportunities for international research and funding at an inter-regional level is welcome could also reflect opportunities for research at a national level.

Future Amendments to the Programme

Where amendments to the Programme are proposed following consultation and prior to adoption, these should be screened for likely significant effects in accordance with the criteria as set out in Schedule 1 of the SEA Regulations and should be subject to the same method of assessment applied in the “environmental assessment” of the Plan.

Information on the Decision - SEA Statement

Following adoption of the Programme, a copy of the SEA Statement summarising information on the decision and environmental monitoring arrangements should be prepared and should be sent to any environmental authority consulted during the SEA process.

Should you have any queries or require further information in relation to the above please contact the undersigned.

Yours sincerely



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