

River Shannon Protection Alliance

Why we say the Dublin Region Water Supply Project is a bad scheme

In September 2011 Dublin City Council published a plan and associated Strategic Environmental Assessment for the Dublin Region Water Supply Project which they had formally adopted in October 2010. Under this scheme it is proposed to pump on average 350 million litres of water a day from the Shannon near Portumna, via Bord na Móna's Garryhinch cut-away bog near Portarlinton, to supply water to the Dublin Region and neighbouring counties. DCC will shortly invite tenders for an Environmental Impact Assessment to support an application to Bord Pleanála under the Strategic Infrastructure Act. The intention is to obtain planning approval in 2014, so that procurement, construction and commissioning can be completed for pumping to start in 2022, at a capital cost of €450 million. Bord na Móna also has a key role in the project and seeks to be the National Water Authority currently under Government consideration.

We in the River Shannon Protection Alliance oppose this scheme – not because we seek selfishly to deny water to our fellow citizens in Dublin, but because we believe it is a bad scheme, not just for the Shannon but for Dublin water consumers as well.

First, we do not believe assurances that water extraction on this scale will not damage the Shannon system.

- Our main concern is the impact of extraction in summer low flow conditions. The plan is to pump at the maximum rate for 10 months of the year and at a lower rate for two, not just at periods of high flow. Hydrological modelling shows that low flow conditions prevail typically for 4 months of the year. At low flow we believe that the reduced flow-rate through Lough Derg would pose risks to water quality which have not been scientifically evaluated. Water levels in Lough Derg are less of a concern, since in principle they can be maintained within statutory limits by ESB sluices.
- We also believe that when Dublin demands water in drought conditions, there will be pressure to open sluices higher up the river in order to maintain levels and flows in the lower Shannon. This would reduce water levels and flows in the middle and upper Shannon, potentially threatening navigation and water quality.
- Such damage would prejudice natural heritage, recreation and tourism throughout the Shannon system, which can only be protected by integrated management.
- ***We therefore call for an independent review of the impact of the proposals on the ecology and hydrology of the entire Shannon system. An Environmental Impact Assessment prepared by consultants working for the scheme's promoters cannot be seen as independent.***

Second, we do not believe the scheme is the best way to meet the Dublin Region's needs for water.

- DCC say that the scheme is needed because demand will increase by 50% by 2040. We believe this is unrealistic, based on Celtic Tiger era growth forecasts in Regional Development plans. Recent figures show demand is static or falling. The planned introduction of water metering and charging will reduce demand, as elsewhere. And changes to planning regulations to promote domestic rainwater harvesting and reuse of grey-water would further reduce demand for treated water.

- Around 30% of treated water is at present wasted by leaks in the distribution network, due to past underinvestment. A concerted programme to reduce leakage to European best practice levels could save 100 million litres per day – as well as providing much needed employment in the short term.
- If demand turns out to be less than forecast the unit cost of water will be greater than planned. Dublin consumers will pay more for water unless subsidised by consumers elsewhere. If the scheme is built as a PPP, the state could perversely find itself compensating a private water utility for under consumption, as has happened with motorway tolls.
- The scheme is being presented as the only way to supply the Dublin Region with enough water. But it is simply not true that there is no alternative to the Shannon.
 - 100 million litres per day is available from groundwater in the Fingal-Meath aquifer.
 - Opportunities to reuse water, as is done in other cities, have not been seriously considered. For instance, the required minimum compensation flow of the Liffey below Leixlip Dam could be maintained by re-circulating water from Islandbridge (just above high tide mark), allowing up to an extra 100 million litres per day to be taken from the Liffey above it. The output from the Ringsend treatment works can also be considered for reuse.
 - Improving technology is reducing the costs of desalination. It can be powered by variable wind-generated renewable energy with minimal CO2 emissions, yet this option has been discarded on grounds that it would conflict with the rules of the Single Electricity Market, which can be changed if necessary.
- We believe that a mixture of such incremental alternatives could supply realistic needs at less cost than Shannon extraction. They should be fully explored before committing to a risky big-bang scheme, in which not one drop of water will be provided until the large capital cost has been incurred.
- ***We therefore call for an independent review of the demand assumptions underlying the scheme, and alternative ways to meet realistic demand. A review by consultants already involved with the scheme cannot be seen as independent.***

The River Shannon Protection Alliance is a voluntary citizens group organised as a company limited by guarantee. We would like to carry out these independent reviews in parallel with the Environmental Impact Assessment, so that they can be fed into the Bord Pleanála process in the interests of reaching the right decision. However with limited funds we cannot pay for the necessary expert advice, which is likely to cost many tens of thousands of Euro. We call for such costs, small in relation to the scheme's total costs, to be met at arms length by the promoters of the scheme, or alternatively from public funds. Only in this way can we, as concerned citizens, participate effectively in the decision making process in this environmental matter, a right established under the UNECE Aarhus Convention. While Ireland has yet to sign it, we claim this as our democratic right as EU citizens since the EU is a party to the Convention.