To: Ramsar Convention Secretariat Rue Mauverney 28 CH-1196 Gland Switzerland

Subject: Urgent Concern: Threat to the Integrity of Belfast Lough Ramsar Site

(Northern Ireland, UK)

Date: 7th January 2025

Dear Ramsar Convention Secretariat,

We are writing to formally raise a serious concern regarding the ongoing degradation of Belfast Lough, a designated Ramsar site in Northern Ireland, due to substantial and persistent discharges of untreated or partially treated sewage and stormwater overspill into its waters. This issue poses a significant threat to the ecological integrity of the site, its biodiversity, and its compliance with the Ramsar Convention's principles and obligations.

Background

Belfast Lough is recognized as a Ramsar site due to its ecological importance, particularly as a habitat for migratory birds and other species of international significance. However, recent evidence indicates that:

- Approximately 1,907,690 cubic meters of untreated or partially treated sewage enters Belfast Lough from the River Lagan annually due to combined sewer overflows (CSOs) and other infrastructure failures.
- 2. This untreated discharge flows down the Lagan River through Belfast and into Belfast Lough, leading to significant pollution in an area protected for its ecological and environmental value.
- 3. The ongoing pollution has led to:
 - Biodiversity loss: Nutrient enrichment has caused algal blooms, threatening aquatic life and bird populations.
 - Habitat degradation: Sensitive ecosystems are being damaged due to poor water quality.
 - Public health risks: Raw sewage introduces harmful pathogens into the water, affecting local communities and recreational users.

Statutory Failures

Despite the importance of Belfast Lough, statutory bodies responsible for its protection appear to be failing in their obligations:

 Northern Ireland Water has not adequately addressed chronic infrastructure deficiencies, resulting in frequent CSO discharges far beyond acceptable levels.

- The Northern Ireland Environment Agency (NIEA) has failed to enforce existing environmental protections, allowing the continued degradation of this internationally significant site.
- There appears to be insufficient investment and planning to upgrade wastewater infrastructure, despite increased pressures from urban development and climate change.

Request for Secretariat Intervention

Given the scale of the threat and the lack of adequate response from local authorities, we respectfully request the Ramsar Secretariat to:

- 1. **Investigate**: Conduct an independent review of the situation at Belfast Lough, assessing whether the UK government and its statutory bodies are fulfilling their obligations under the Ramsar Convention.
- 2. **Engage with UK Authorities**: Request that the UK government provide an action plan to address the pollution and ensure the protection of Belfast Lough in accordance with Ramsar principles.
- 3. **Highlight Non-Compliance**: If appropriate, issue a formal statement regarding the failure of local authorities to protect this Ramsar site.
- 4. **Support Public Advocacy**: Encourage international support and highlight this case as an example of the need for stronger protections for Ramsar sites worldwide.

Supporting Documentation

We have attached the following information and evidence for your consideration:

• Ramsar Site Identifiers for Belfast Lough

Country: United Kingdom of Great Britain and Northern Ireland

Ramsar Site number: 958

Area: 432 ha

Designation date: 05-08-1998 Coordinates: 54°39'N 05°51'W

Water quality reports and discharge statistics demonstrating the scale of pollution.

September 2024 Office of Environmental Protection Report "A Review of Implementation of the Water Framework Directive Regulations and River Basin Management Planning in Northern Ireland". This report found only 31% of rivers and other water bodies currently meet the WFD NI Regulations' objectives of "good ecological status" or "good ecological potential" it states: "Not only has there been little overall positive change in the status of water bodies in recent years, there has also been some apparent regression".

Review of Implementation

NI Water's Paddy Brow's report 'The Story of Belfast Lough'. This report from the Living
With Water Programme, NI Water lifts the lid on a grim future featuring pollution,
bacteria infested beaches, stagnating swimming waters, contaminated rivers,
septic wildlife lagoons and sewage debris risking people and wildlife alike.

The story of Belfast Lough

Photographic and video evidence of the affected areas.

In relation to the Spotlight Programme we note that Paddy Brow of NI Water, acknowledges in the film that NI Water is in breach of legislative obligations regarding its discharges into the only River Basin fully within Northern Ireland, namely Belfast Lough.

BBC SPOTLIGHT Programme

 The Office of Environmental Protection published a Biodiversity Report in September 2024

Biodiversity Report 2024

 Local reports and testimonies detailing the impact on biodiversity and public health.

Sewage spills a threat to lough's 'hero' mussels

 Correspondence with statutory bodies and details of their responses (or lack thereof).

We have been trying to call a halt to development in the Lagan Valley Regional Park for over three years. The Lagan River Valley drains into the Belfast Lough and our discoveries of levels of sewage pollution in the river and thence to the Belfast Lough have truly shocked us. Not least because local planning and government say that development 4 miles upriver has no impact on Belfast Lough and it is therefore not a consideration. You can see our story on our website.

Quarterlands.com

Conclusion

The environmental impact on and degradation of Belfast Lough is an urgent matter that undermines the Ramsar Convention's goals and principles. As concerned citizens, we appeal to the Ramsar Secretariat to take decisive action to address this issue and protect the ecological and international significance of Belfast Lough.

Thank you for your attention to this critical matter. We are available to provide further information or clarification as needed.

Yours sincerely,

Lisa Catherwood (Hon Sec) Quarterlands Group