



Joint response to the Bathing Waters Policy Review

Dear Bathing Waters Policy Review Team,

Introduction

Outscape, the Northern Ireland Sports Forum and the Clean Water Sports Alliance NI welcome DAERA's review of the Bathing Waters Policy. It represents a timely opportunity to modernise bathing water management so that it reflects how Northern Ireland's rivers, lakes and coastline are used today.

Collectively, our organisations represent and support thousands of people who participate in outdoor recreation and water-based activities across Northern Ireland. Our members include governing bodies, clubs, community organisations and recreational users involved in activities including swimming, paddlesports, sailing, surfing, angling and triathlon. We also work closely with local authorities, land managers and government departments to improve access to high-quality outdoor recreation opportunities.

For context,

- [Outscape](#) is a not-for-profit organisation helping people responsibly enjoy the outdoors. Since 1999, it has shaped policy, strategies, trails and greenspaces while delivering training and participation programmes. Its People in the Outdoors Monitor and GreenspaceNI Map provide evidence on participation, access, barriers and gaps in provision.
- [Northern Ireland Sports Forum](#) is the recognised umbrella organisation and independent voice for Northern Ireland's voluntary sport and recreation sector. It represents and supports governing bodies and other member organisations through advocacy, policy engagement, governance advice, safeguarding and a range of shared services.
- [Clean Waters Sports Alliance NI](#) is a coalition of Northern Ireland's water-based sports governing bodies, representing more than 22,000 club members and approximately 300,000 participants. It campaigns for sustained investment in water quality and regulation, real-time water-quality monitoring and recognition of the full range of recreational water users, not only bathers, in government policy.

This paper supplements our online consultation response, providing additional evidence and recommendations where the consultation questionnaire does not allow sufficient explanation. It is intended as a constructive contribution to the development of a modern, evidence-led bathing water policy that protects public health, improves water quality and supports sustainable outdoor recreation.

Why this matters

Good water quality is fundamental to outdoor recreation.

Confidence in the quality and safety of Northern Ireland's waters directly influences participation in swimming, paddlesports, sailing, surfing, angling and many other activities. These activities deliver significant benefits for

physical health, mental wellbeing, community cohesion, tourism and local economies, while supporting wider Executive priorities relating to public health, active lifestyles and environmental sustainability. Data from the [People in the Outdoors Monitor for Northern Ireland \(POMNI\)](#) 2025 survey reveals that:

- 70% of Northern Ireland adults spend time outdoors in natural places at least weekly, generating an estimated 134 million outdoor visits annually.
- 80% would like to spend more of their free time outdoors.
- 82% of visits were motivated by health or wellbeing, while 87% delivered a reported health or wellbeing benefit.

In relation to water-recreation participation:

- In the previous four weeks, 3% of adults had participated in outdoor swimming, 2% in angling or fishing, 1% in paddleboarding/SUP and 1% in canoeing or kayaking (these figures should not be added together because respondents could select more than one activity).
- 17% of people's most recent outdoor visits included a beach, coastline or the sea, making this the fourth most frequently visited type of outdoor location.
- 14% of recent outdoor visits included a river, lake or canal, an increase from 12% in 2020/21. This rose to 19% during July 2025.
- Younger adults aged 18–34 were more likely to visit rivers, lakes and canals, while adults aged 65 and over were more likely to visit beaches or other coastal locations.

Participation in water recreation has evolved significantly over the past decade. However, bathing water policy has remained largely centred on the traditional concept of a summer swimmer. Today's policy should instead reflect the diverse range of recreational water users who access rivers, lakes and the coast throughout the year.

We therefore welcome DAERA's ambition to modernise the policy. However, we believe the current proposals require further refinement if they are to deliver the full public health, environmental and recreational benefits available.

Our Two Priorities

We believe the revised Bathing Water Policy should be underpinned by two fundamental principles.

1. Recognise recreational water users

Bathing water policy should protect everyone who uses or is reasonably likely to come into contact with water, rather than focusing solely on traditional bathers.

Identification of monitored waters should therefore reflect actual recreational use and foreseeable exposure, recognising activities including swimming, surfing, paddle sports, sailing, angling, triathlon and other water-based recreation.

2. Extend the season

As an immediate priority, the bathing water season should be extended to 1 April–31 October to better reflect when water recreation takes place. Over time, evidence should inform targeted winter monitoring and ultimately year-round protection where the level of recreational use or public health risk justifies this.

Everything else in the consultation naturally follows from these two principles.

1. Communicating information to water users

Position: Support improvement of the dashboard and more responsive information, with important accessibility safeguards.

We strongly support DAERA's commitment to improving the information available to recreational water users. Better information enables people to make informed decisions, increases confidence in outdoor recreation and strengthens public trust in the monitoring programme.

The existing dashboard is a valuable step, but the current ArcGIS interface can be difficult to navigate and results are not live. DAERA should provide a mobile-first service showing current status, the date and time of the latest sample and forecast, plain-language risks and actions, and prominent incident warnings. Forecasts should combine rainfall data, real-time event-duration information from all combined sewer overflows capable of affecting the site, and validated water-quality data. The dashboard should publish automatic alerts when a relevant discharge begins and ends, clearly explaining that this provides an indication of potential pollution risk rather than a live measurement of water quality at the site. The model, thresholds, validation and accuracy should be published so that users can understand what a forecast can-and cannot-tell them. [England provides a clear benchmark](#): the Environment Act 2021 provided for comprehensive monitoring of storm overflows and their impacts, including continuous water-quality monitoring upstream and downstream of relevant assets. Since 1 January 2025, section 141DA of the Water Industry Act 1991 has required English water companies to publish clear, publicly accessible information within one hour of a storm-overflow discharge starting and ending; Northern Ireland should follow suit.

We support incident-led poster updates only if permanent signs continue to show the current classification, principal risks and action to take. A QR code cannot be the sole route to safety information: alternatives should include a readable on-site warning and phone or web details for people without a smartphone, data or signal. DAERA, SWIM NI and compliant third-party data should feed a single accessible platform and an open data feed that trusted services such as [OutMoreNI](#) can reuse.

2. Length of the bathing season

Position: Extend the season to 1 April–31 October as an immediate priority, while developing evidence-led winter provision and work towards year-round protection where recreational use or risk warrants it.

The present 1 June–15 September season does not reflect how Northern Ireland's waters are used for recreation. Activities such as surfing, sailing, paddling, angling, triathlons or open-water swimming take place throughout the year. RYA Northern Ireland reports that around 80% of NI Sailing Team activity takes place in the winter months. These activities support physical and mental wellbeing throughout the year, and some users may be more vulnerable to infection. DAERA's existing year-round monitoring of the 33 identified sites since 2024 provides a useful evidence base; its value should be evaluated and retained where it improves protection.

A winter-only season may be useful at selected sites, but selection criteria should be transparent and consider usage, public-health risk, ecology and local conditions. We recommend a usage and feasibility study, undertaken with governing bodies and communities, to identify seasonal patterns and sites requiring year-round monitoring.

Our immediate priority is therefore to extend the standard bathing water season to **1 April–31 October** while increasing the number of monitored locations. Resources required to develop future winter monitoring should be additional investment and must not delay or compromise this immediate expansion.

3. Risk-based bathing-water monitoring

Position: Support additional risk-led monitoring at higher-risk sites and monthly monitoring at consistently Excellent sites that are demonstrated to be genuinely low risk, subject to strict eligibility criteria and safeguards.

A sustained Excellent record can provide a sound basis for proportionate monitoring and allow resources to be focused on extending the bathing season, increasing the number of monitored sites and strengthening scrutiny where risks are greatest. However, classification is retrospective and should not, on its own, qualify a site for reduced monitoring, as short-lived or emerging pollution incidents may still occur.

Before reducing monitoring, DAERA should publish a site-specific public-health risk assessment and clear eligibility criteria. Sites affected by combined sewer overflows, agricultural runoff, recurring algal blooms or other significant or uncertain pollution pressures should be excluded. DAERA should retain periodic verification, review eligibility regularly and automatically restore more frequent sampling following an incident, deterioration in water quality or any material change in local risk.

Higher-risk monitoring should continue to be supported through additional investment wherever possible. Where combined sewer overflows within the relevant catchment could affect a bathing or recreational water site, real-time event-duration monitoring should be installed and the start and end of each discharge published promptly through the public dashboard. This would improve public confidence, provide a live indication of potential pollution risk and enable DAERA to issue timely warnings and initiate incident-based water-quality sampling. CSO monitoring should complement, rather than replace, microbiological monitoring, as evidence that a discharge has occurred does not in itself confirm the water quality at the recreational site.

4. Criteria for identifying bathing waters

Position: Modernise Northern Ireland's Bathing Water Programme by introducing a broader **Recreational Water Framework** that protects all recreational water users while retaining Bathing Water classifications for sites primarily used for swimming.

The current Bathing Water Regulations were developed at a time when recreational use of water was largely associated with traditional bathing. Today, Northern Ireland's rivers, lakes and coastline support a much broader range of activities including activities such as swimming, diving, surfing, bodyboarding, paddleboarding, canoeing and kayaking, kite- and windsurfing, dinghy sailing, triathlon, angling and wading, alongside newer and evolving activities such as wing foiling and foil boarding. Any list must be illustrative rather than exhaustive, as prescriptive wording will quickly become outdated and exclude emerging forms of recreation; changing weather, capsizing, spray and learning activity can also turn normally incidental contact into whole-body exposure. Collectively these activities involve many thousands of participants throughout the year and contribute significantly to public health, wellbeing, tourism and the rural economy.

While bathing water classification remains an important public health tool, it should become one component of a broader **Recreational Water Framework** that reflects modern patterns of use. This would move the focus from protecting a single activity to protecting people wherever significant recreational water use occurs.

Under such a framework, DAERA would identify **Recreational Water Sites** based on evidence of recreational use, public health risk and environmental characteristics. Sites where swimming is the predominant activity would continue to receive formal Bathing Water designation and classification in accordance with legislation. Other locations with significant recreational use would receive an appropriate level of microbiological monitoring, risk assessment, public information and incident notification proportionate to the type and intensity of use.

This approach would allow Northern Ireland to:

- recognise the full range of recreational water users rather than only bathers (this aligns with the Clean Water Sports Alliance UK call for the [recognition of all recreational water users across decision making and policy](#));
- target monitoring where people actually recreate;
- improve public health protection across a much wider network of blue spaces;
- support the continued growth of outdoor recreation and water sports;
- make better use of evidence gathered through participation surveys, governing bodies and local communities; and
- provide a scalable framework capable of adapting as recreational use changes over time.

To support implementation, there is potential for DAERA to work collaboratively with Outscape, the Northern Ireland Sports Forum, governing bodies and local authorities to develop a validated **Northern Ireland Bluespace Map** building upon the existing GreenspaceNI platform. This would provide the evidence base for identifying Recreational Water Sites, understanding seasonal patterns of use, prioritising monitoring investment and informing future policy decisions. Where data is available, the map should also show monitoring locations, catchment boundaries, significant pollution sources and combined sewer overflows capable of affecting recreational waters, with links to current discharge alerts and relevant water-quality information.

The Bathing Water Programme would therefore become one element of a wider Recreational Water Framework, ensuring that monitoring, management and public information better reflect how Northern Ireland's waters are used today while continuing to meet statutory bathing water requirements.

In addition, we support the annual publication and review of the list of identified recreational waters, enabling the programme to respond more quickly to changing patterns of use. However, any additions or removals should be underpinned by transparent, evidence-based criteria, public consultation, equality screening and a clear mechanism for review or appeal.

5. Monitoring candidate sites

Position: Support a structured candidate stage only if it is time-limited, transparent and used to inform users and drive improvement, not to exclude popular polluted sites.

Monitoring before identification can build a stronger evidence base. However, the proposed test of whether it is ‘feasible and affordable’ to achieve at least Sufficient quality creates a serious risk: a heavily used site could receive permanent advice against bathing instead of the monitoring, investment and regulatory attention needed to make it safer. High use and foreseeable exposure should trigger bathing-water-specific monitoring and a funded improvement plan; poor quality should intensify action, not reduce protection.

DAERA should define and publish the evidence, costs, alternatives and public-health criteria used; set a maximum candidate period; consult users; update Section 75 screening; and provide an independent route to review a refusal. Water Framework objectives remain important but are not an equivalent safeguard: DAERA’s proposal acknowledges that Water Framework monitoring does not include microbiological testing. Permanent warnings can also displace people to unfamiliar or less accessible locations, creating safety and equality consequences. The ongoing Surfers Against Sewage challenge to related reforms in England and Wales illustrates the concern that popular waters could be treated as too polluted or costly to protect; Northern Ireland should build stronger safeguards into the policy from the outset.

6. Removal of automatic de-identification

Position: Support case-by-case review rather than automatic removal after five Poor years, but not the proposal as currently framed as a sufficient public-health safeguard.

A poor-performing water should remain identified, monitored and clearly signed while a funded, enforceable and time-bound improvement plan is delivered. Each plan should identify pollution sources, responsible bodies, funding, milestones, reporting dates and escalation or enforcement where progress fails. Decisions should consider levels and patterns of use, the realistic improvement timescale, equality and accessibility impacts, and the safety effects of displacement.

Flexibility must not become indefinite delay. The five-year period is already substantial, and extensions should be for a specified period aligned to clear investment and River Basin Management Plan milestones. DAERA should publish its criteria, assessment and decision, consult affected users and provide a route to review. Affordability must not justify early de-identification or the prolonged management of pollution through warnings alone.

7. Ensuring monitoring locations match actual usage

Position: Review all current monitoring points; there is not enough published evidence to confirm that every location remains representative.

Open-water swimming and dipping patterns have changed, and other sports may use different access points or parts of a water body. Each monitoring point should be checked against current entry and launch points, organised and informal activity, currents, and prevailing conditions, outfalls, rainfall effects and seasonality. Larger or variable sites may require more than one sampling point.

The review should be undertaken with Triathlon Ireland, Swim Ulster, Royal Yacht Association Northern Ireland, Ulster Angling Federation, National Coarse Fishing Federation of Ireland, the National Outdoor Recreation Forum, Paddle NI, Rowing Ireland, Irish Surfing, local clubs and communities. DAERA should publish the evidence and rationale for each location and invite corrections. A validated GreenspaceNI/bluespace layer could help map activity and identify evidence gaps.

8. Other stakeholder recommendations

Position: Monitoring alone does not improve water quality. The revised Bathing Water Policy should establish a clear framework that uses monitoring to drive continuous environmental improvement.

The purpose of the Bathing Water Programme should extend beyond classifying water quality and informing recreational water users. It should drive cleaner, healthier waters through targeted investment, pollution reduction and coordinated action.

Where monitoring identifies a site as Poor, or shows a declining trend, DAERA should require a site-specific Water Quality Improvement Plan. Each plan should identify pollution sources, allocate responsibilities, set clear timescales, identify funding requirements and report progress publicly. Warning signs should not become a substitute for tackling the underlying causes of pollution.

Finally, DAERA should publish an annual Recreational Water Report summarising water quality trends, improvement actions, investment and progress against site improvement plans. This would increase transparency, strengthen accountability and ensure the programme is judged not simply by how well it monitors water quality, but by how effectively it improves it.

Conclusion

The Office for Environmental Protection has recommended that bathing-water management reflects actual seasonal use, improves short-term pollution forecasting and use clear, specific and time-bound measures at individual water bodies. WHO guidance likewise places health-based targets, surveillance, risk assessment, monitoring and timely public advice at the center of recreational-water safety. These principles provide a sound basis for DAERA's final framework.

We believe DAERA has an opportunity to establish one of the most progressive bathing water policies within the UK. We encourage DAERA to ensure the final policy:

- recognises recreational water users rather than simply bathers;
- extends monitoring to reflect where and when people actually recreate;
- strengthens public health protection through better information and evidence-led monitoring;
- uses monitoring as a catalyst for improving water quality rather than simply classifying it.

Outscape, the Northern Ireland Sports Forum and the Clean Water Sports Alliance NI would welcome the opportunity to meet with DAERA officials before the policy is finalised. Collectively, we can provide expertise on recreational water use, participation patterns, user behaviour, monitoring locations and public communication, helping to ensure the final policy is both evidence-led and practical to implement.

We would welcome the opportunity to work with DAERA on definitions, usage evidence, monitoring locations, equality considerations and user communications. This letter should be read alongside our individual online consultation responses.

Yours faithfully,

Outscape
Northern Ireland Sport Forum
Clean Water Sports Alliance NI

Key sources

1. [DAERA, Consultation on the Bathing Waters Policy Review for Northern Ireland](#)
2. [World Health Organization, Guidelines on recreational water quality: Volume 1](#)
3. [Office for Environmental Protection, Updating Bathing Water Regulations would better protect the public](#)
4. [Paddle UK, Paddle UK backs calls to change definition of 'bather'](#)
5. [Surfers Against Sewage, SAS vs the Government](#)