



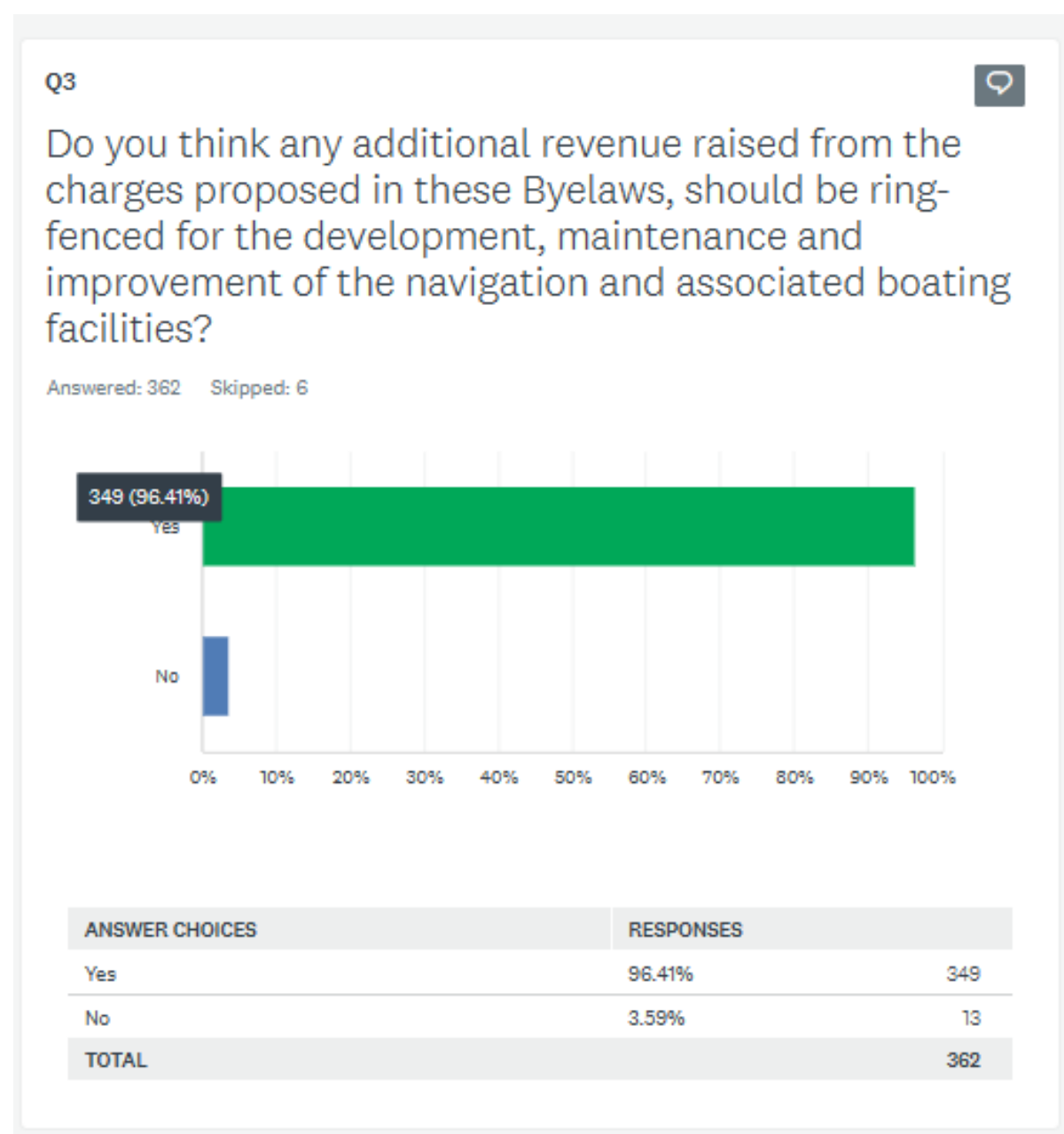
Inland Waterways Association of Ireland (IWAI)

Survey results and Members Written Feedback in relation to the draft Shannon Byelaws

Survey results

Q1 IWAI Members name – withheld but available

Q2 – IWAI Membership Number, withheld but available





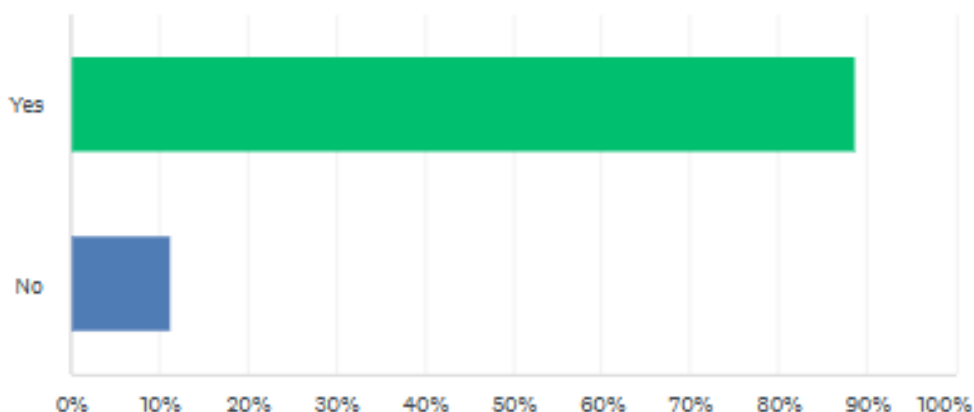
Inland Waterways Association of Ireland (IWAI)
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Shannon Byelaws

Q4



Do you believe Waterways Ireland facilities should be available for use by boaters all year round?

Answered: 363 Skipped: 5



ANSWER CHOICES	RESPONSES	
Yes	88.71%	322
No	11.29%	41
TOTAL		363



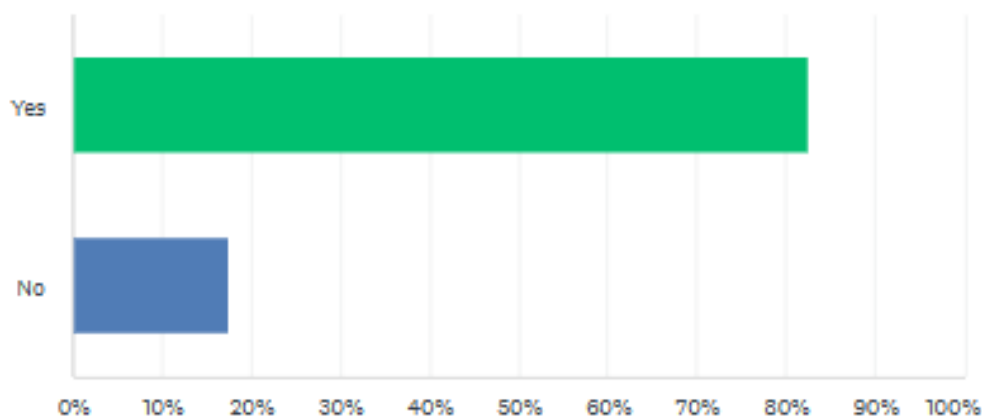
Inland Waterways Association of Ireland (IWAI)
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Shannon Byelaws

Q5



Should interim arrangements, such as a visitor's permit, be put in place to allow Erne registered boats to use the Shannon without payment of the annual registration fee (in the absence of the Erne Byelaws being enacted)?

Answered: 359 Skipped: 9

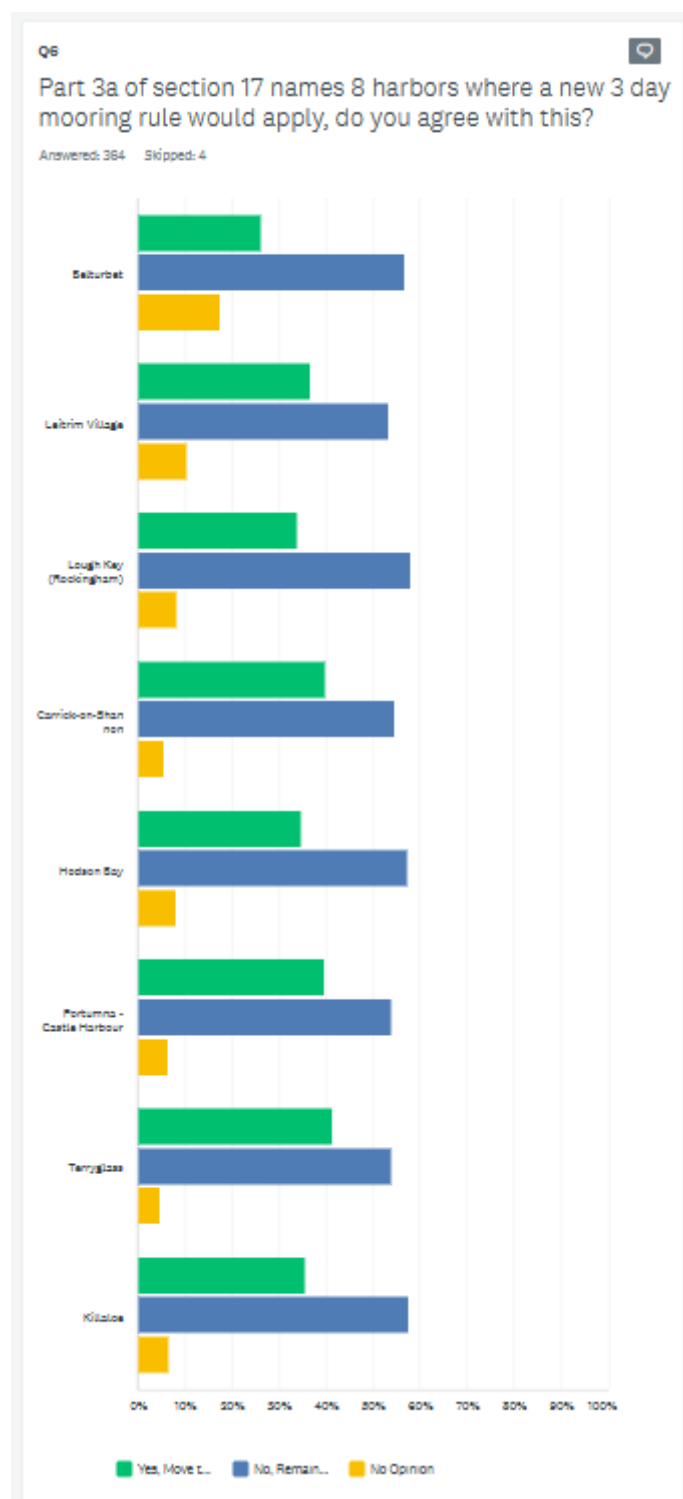


ANSWER CHOICES	RESPONSES	
Yes	82.45%	296
No	17.55%	63
TOTAL		359



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Survey results and Members Written Feedback in relation to the draft Shannon Byelaws





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	YES, MOVE TO A 3 DAY RULE	NO, REMAIN AT 5 DAY RULE	NO OPINION	TOTAL RESPONDENTS
Belurberet	26.32% 96	56.79% 206	17.45% 63	361
Leitrim Village	36.69% 131	53.22% 190	10.36% 37	357
Lough Key (Rockingham)	33.89% 122	58.06% 208	8.33% 30	360
Carrick-on-Shannon	39.89% 144	54.57% 197	5.54% 20	361
Hodson Bay	34.82% 125	57.38% 206	8.08% 29	359
Portumna - Castle Harbour	39.61% 143	54.02% 196	6.37% 23	361
Terrylglass	41.44% 150	53.87% 196	4.70% 17	362
Killaloe	35.65% 128	57.66% 207	6.69% 24	359



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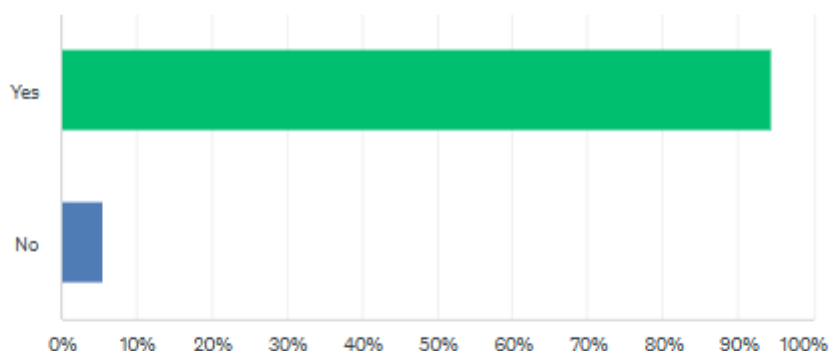
Survey results and Members Written Feedback in relation to the draft Shannon Byelaws

Q7



Do you think Waterways Ireland should introduce a formal system to extend harbour stay periods when boat owners cannot move vessel for safety or other genuine reason?

Answered: 365 Skipped: 3



ANSWER CHOICES	RESPONSES	
Yes	94.52%	345
No	5.48%	20
TOTAL		365



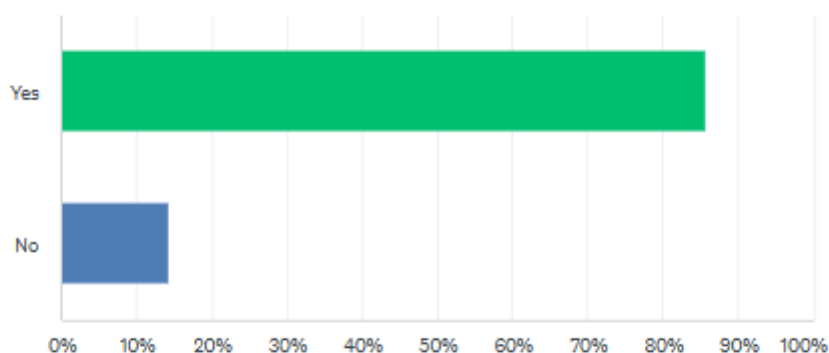
Inland Waterways Association of Ireland (IWAI) Survey results and Members Written Feedback in relation to the draft Shannon Byelaws

Q8



Should Waterways Ireland allow extended stays at harbours to accommodate local events, if given sufficient notice of said event?

Answered: 366 Skipped: 2



ANSWER CHOICES	RESPONSES	
Yes	85.79%	314
No	14.21%	52
TOTAL		366



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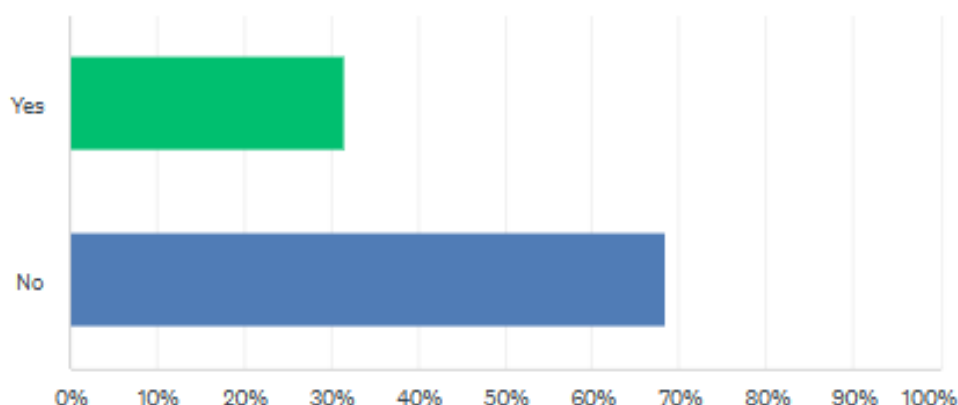
Survey results and Members Written Feedback in relation to the draft Shannon Byelaws

Q9



Regulation 17(3)© proposes to abolish winter mooring.
Do you agree with this?

Answered: 364 Skipped: 4



ANSWER CHOICES	RESPONSES	
Yes	31.59%	115
No	68.41%	249
TOTAL		364



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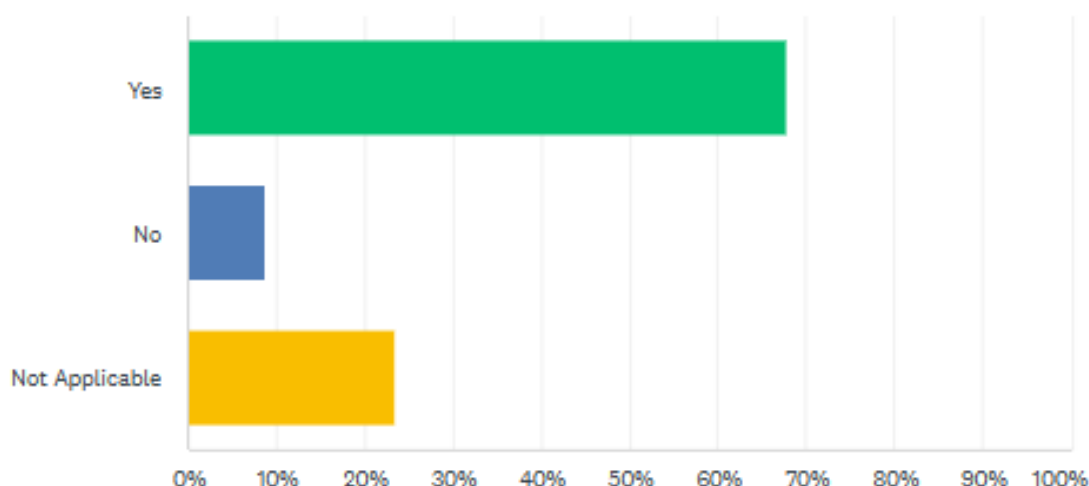
Survey results and Members Written Feedback in relation to the draft Shannon Byelaws

Q10



If you answered No to question Question 9, do you think winter moorings should be retained in specific harbour locations with utilities provided over the winter period?

Answered: 329 Skipped: 39



ANSWER CHOICES	RESPONSES	
Yes	67.78%	223
No	8.81%	29
Not Applicable	23.40%	77
TOTAL		329



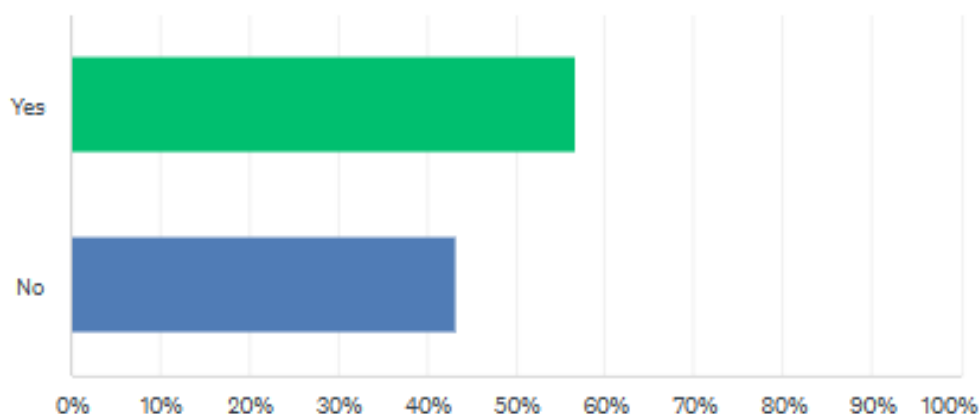
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Shannon Byelaws

Q12



Section 29 (9) (o) states that no person shall burn fuels in vessel stoves that causes the emission of smoke, fumes or causes air quality deterioration. Do you agree that non-smokeless fuels should be banned from being burned on board boats?

Answered: 356 Skipped: 12



ANSWER CHOICES	RESPONSES	
Yes	56.74%	202
No	43.26%	154
TOTAL		356



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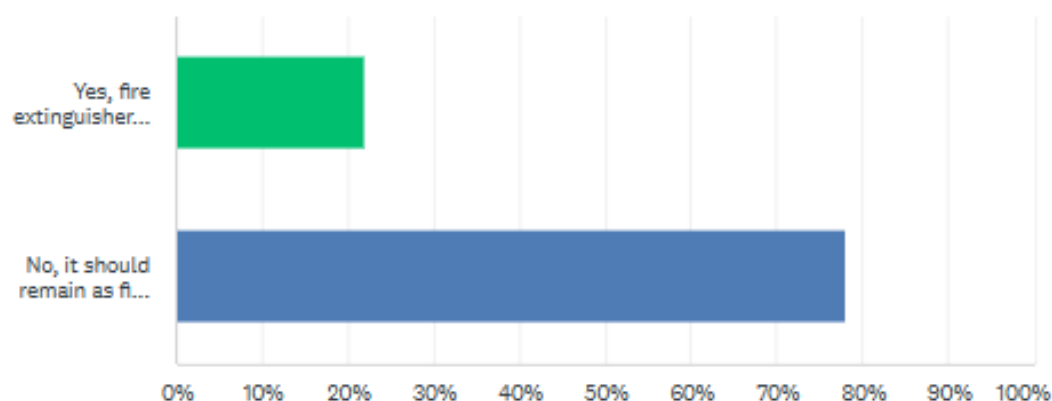
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Q13



Section 37 states that fire extinguishers must be "in working order, serviced every year and the service recorded on them." Do you agree with this wording?

Answered: 365 Skipped: 3



ANSWER CHOICES	RESPONSES	
Yes, fire extinguisher should be professionally serviced every year	21.92%	80
No, it should remain as fire extinguishers must be in working order	78.08%	285
TOTAL		365

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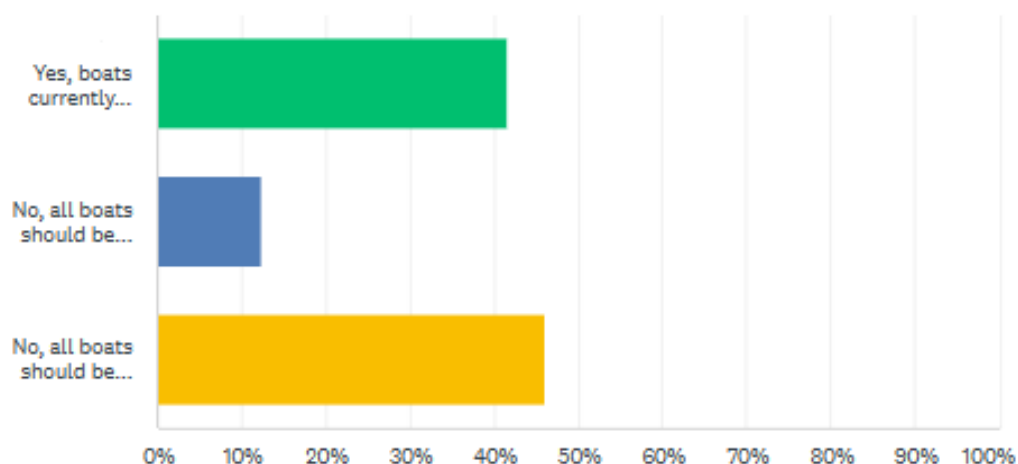
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Q14



Section 40 states "A toilet fitted to a boat or vessel shall be so constructed and fitted as to prevent polluting matter from being discharged or passing into the navigation". Do you believe grandfathering arrangements should be put in place for boats that do not currently have holding tanks fitted to exempt them from this requirement?

Answered: 365 Skipped: 3



ANSWER CHOICES	RESPONSES
Yes, boats currently without holding tanks fitted should be exempt	41.64% 152
No, all boats should be required to fit holding tanks or other equivalent system that prevents toilet waste entering the waterways	12.33% 45
No, all boats should be required to fit holding tanks or other equivalent system that prevents toilet waste entering the waterways but a 3yr lead in period to allow the work to be done should be included	46.03% 168
TOTAL	365



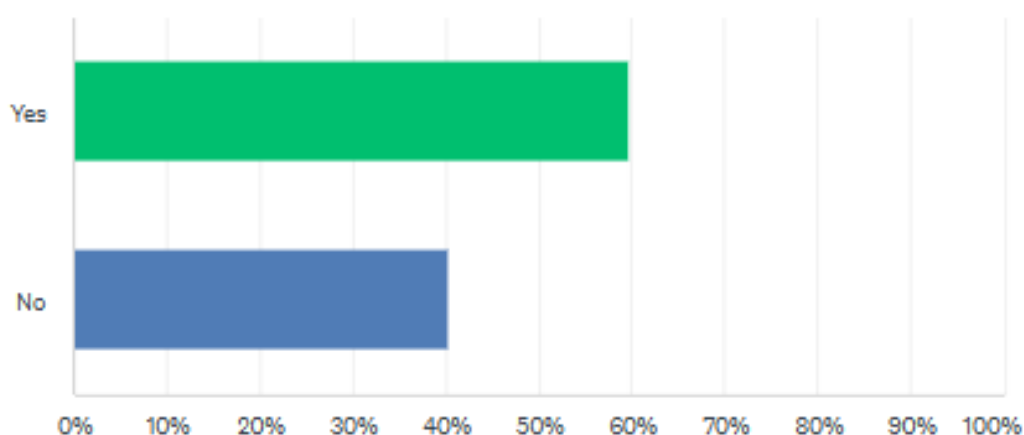
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Q15



If your vessel has accommodation space, does it have a holding tank?

Answered: 348 Skipped: 20



ANSWER CHOICES	RESPONSES	
Yes	59.77%	208
No	40.23%	140
TOTAL		348



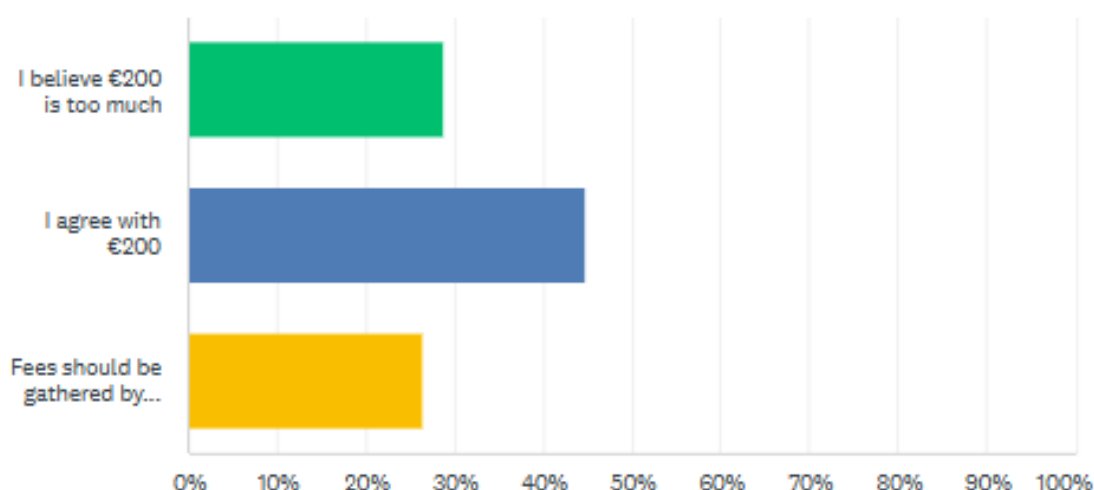
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Q16



Schedule 1 sets the annual registration fee at €200. Do you agree with this?

Answered: 364 Skipped: 4



ANSWER CHOICES	RESPONSES	
I believe €200 is too much	28.85%	105
I agree with €200	44.78%	163
Fees should be gathered by going through locks as before	26.37%	96
TOTAL		364



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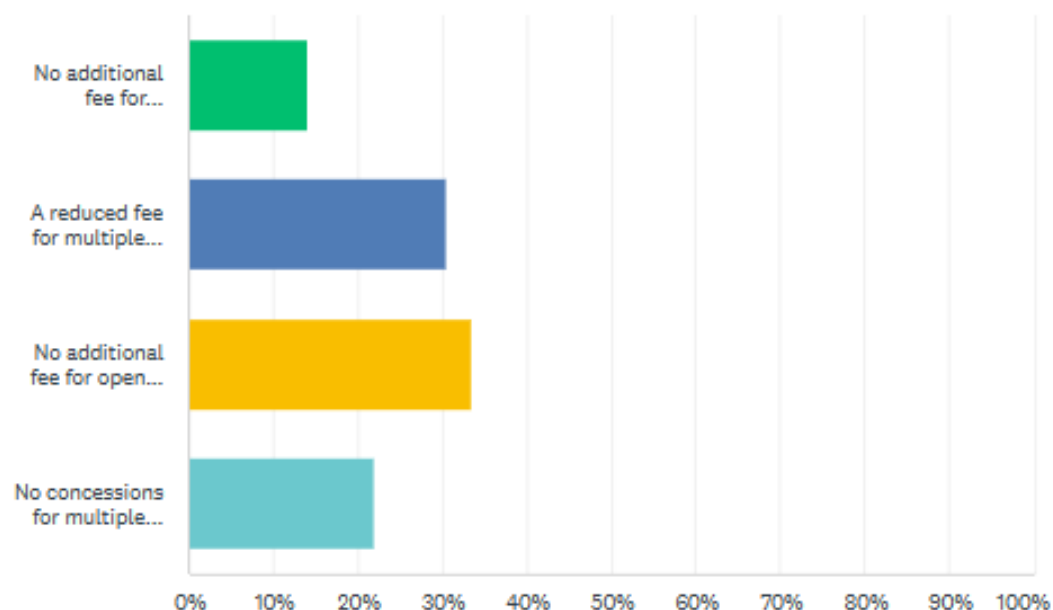
Survey results and Members Written Feedback in relation to the draft Shannon Byelaws

Q17



Do you believe reduced or no annual registration fee should apply for owners of multiple boats?

Answered: 361 Skipped: 7



ANSWER CHOICES	RESPONSES	
No additional fee for multiple boats	14.13%	51
A reduced fee for multiple boats	30.47%	110
No additional fee for open boats of less than 7 metres length	33.52%	121
No concessions for multiple boat owners	21.88%	79
TOTAL		361



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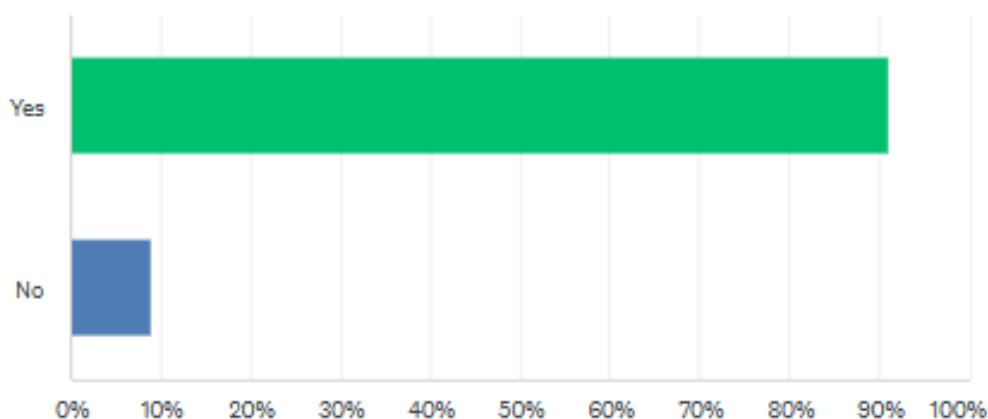
Survey results and Members Written Feedback in relation to the draft Shannon Byelaws

Q18



Do you believe there should be an appeal mechanism for fixed notice payments outside of going to court?

Answered: 365 Skipped: 3



ANSWER CHOICES	RESPONSES	
Yes	90.96%	332
No	9.04%	33
TOTAL		365



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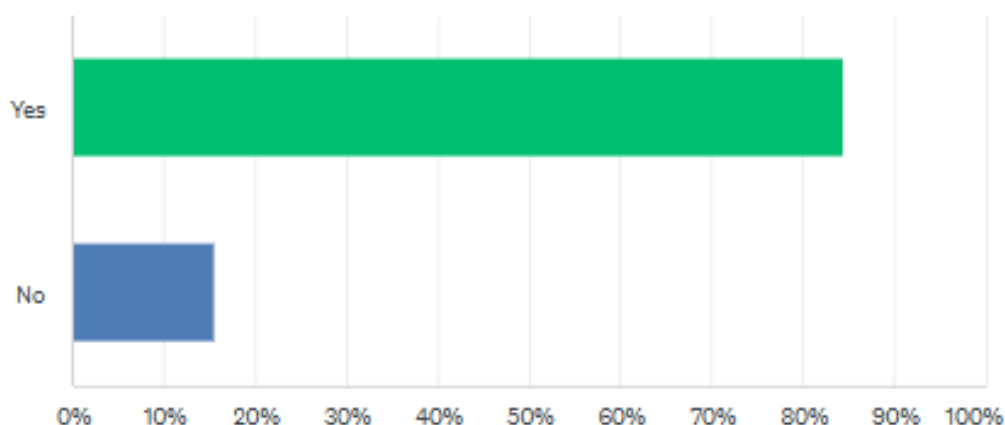
Survey results and Members Written Feedback in relation to the draft Shannon Byelaws

Q19



Do you believe that greater fixed payments amounts should apply for repeat offenders?

Answered: 362 Skipped: 6



ANSWER CHOICES	RESPONSES	
Yes	84.53%	306
No	15.47%	56
TOTAL		362



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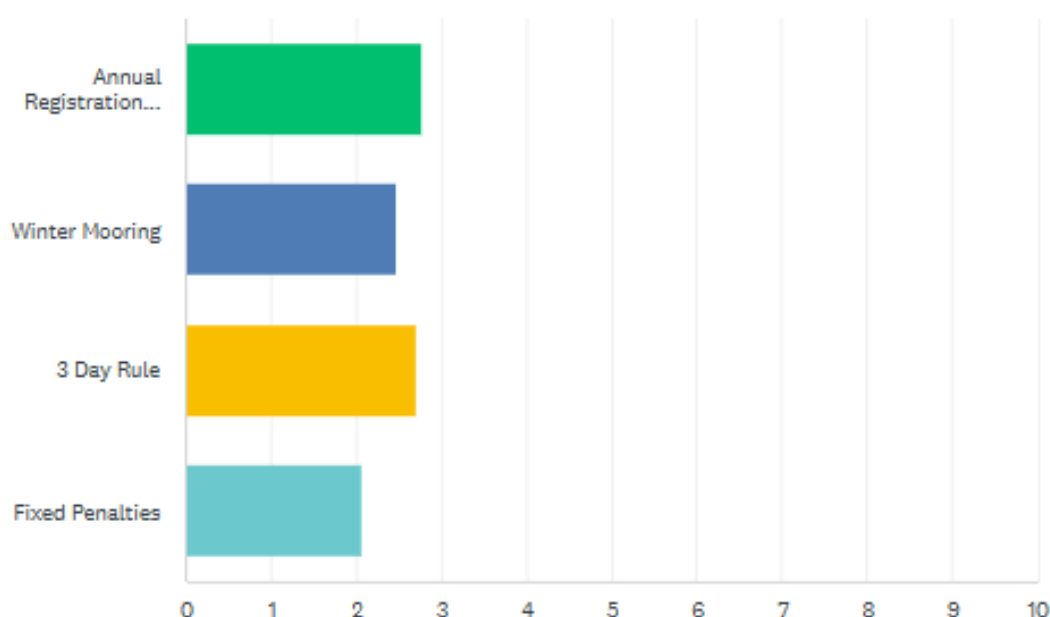
Survey results and Members Written Feedback in relation to the draft Shannon Byelaws

Q20



Please rank the following proposed changes in the order, with 1 being the one you are most opposed to and so on.

Answered: 342 Skipped: 26



	1	2	3	4	TOTAL	SCORE
Annual Registration Fee	41.23% 141	20.47% 70	12.57% 43	25.73% 88	342	2.77
Winter Mooring	22.81% 78	26.90% 92	24.85% 85	25.44% 87	342	2.47
3 Day Rule	24.27% 83	33.92% 116	28.95% 99	12.87% 44	342	2.70
Fixed Penalties	11.70% 40	18.71% 64	33.63% 115	35.96% 123	342	2.06



Inland Waterways Association of Ireland (IWAI)

Survey results and Members Written Feedback in relation to the draft Shannon Byelaws

The table below contains the collated written feedback received by the IWAI Executive in relation to the Waterways Ireland draft Canal Byelaws.

Byelaw	Comment
General	it seems WI have engaged in a dictatorial and ham-fisted manner to push their will through in an adversarial manner, counter to the original underlying cooperative developmental principles, at least among a wide body of stakeholders, and albeit against a background of civil service antagonism. € 200, and per boat is ignorant. You can tax a car you drive every day for that. Greenway access is free to all
	Good luck and well done to everyone keeping our waterways safe and clean for all future generations
	Waterways Ireland looking for too much authority with these proposed by-laws in my opinion. They are there to maintain the waterways for all use. They are not a police force.
	Generally I'm in favour of the changes
	Keep upgrading the system to develop the waterways
	Extend the busy harbours to allow more berths to encourage even more use and allow people to enjoy the system. Promote and educate for all craft owners to understand river etiquette, speed and wake, harbour hogging, mooring etc. .
	All boats and activities on and near the waterways should contribute in some way to the upkeep and maintenance of the system
	WI should have Transit moorings, where only occupied boats can moor, a more boater friendly attitude needs to be adopted by WI, where boaters are regarded and treated as customers and not victims. We are tourists and deserve to be treated as such. Will the requirements to get WI approval for events apply to all user group, or fishermen, swimming, sailing, walkers etc.
	Work to improve the system so that boaters can use it to generate income from tourism for the water system
	Why not focus on speed boats and jet skis that harm the bird life. If focused too much on legislation the river will only be for hire boats. Sad.
	Heritage boats of historical significance are instrumental in preserving and promoting our waterways' rich heritage. At present, they hold a pivotal role in drawing public interest and raising consciousness of the history and significance of our navigational routes. Like the classic motor vehicles that



Inland Waterways Association of Ireland (IWAI)

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Byelaw	Comment
	enhance the charm of our highways, boats of historical importance should be exempt from the €200 licensing fee.
	WI should consider expanding its capacity in high-demand locations rather than reducing the permissible mooring period from five days to three. The potential provision of tranquillity moorings and mooring buoys could be beneficial
	WI seems predominantly focused on maintaining navigations for the benefit of hire boat companies, for example the neglect of the Limerick Navigation and a lack of investment in alternative harbouring on the Abbey River.
	WI have done a good job on the Shannon and the canals. Overall we have to pay for service on the river but it shouldn't be so high as to turn people away from the river. They should try to find a middle ground to soothe everyone. On the grand canal basin I live 200meters from the basin and it's empty the people in charge haven't a clue what to do with it. Vessels from outside the basin should be allowed to visit over weekend to make the place viable there are 2 rowing clubs, 2 sea scouts groups, the Poolbeg ,boat and sailing club, Clontarf yacht club just outside the sea Lough Ringsend river Liffey
	These regulations take no account of people who have been using the waterway for over 40 years and are not in a position to upgrade our boats. The regulations, particularly with regard to holding tanks for older boats, will effectively end our boating lives.
	As a user of the Shannon Navigation for more than 50 years, I feel that the proposed byelaws will push the cost of using the Shannon out of the range of the ordinary boater and turn it into a plaything of the very rich and elite
	Abolishing services that already exist will present many logistical issues for boat owners.
	WI should take over the harbours and moorings currently under the control of the various councils. Those who are permanent residents in the respective villages with a cruiser with accommodation should be able to apply for a "residents permit" to keep their boat in a good seaman like condition in the relevant harbour. Those harbours should then be cleared by WI of unsightly and "derelict vessels" and owners notified accordingly. This will greatly allow additional moorings to become available for visitors and tourists especially with the 3 or 5 day rule.
	We should use this consultation period to get WI to extend the lock opening times during the summer and staff the locks with sufficient operators to work through the lunch hour. I think we should be careful with the byelaws that we do not discourage new



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Byelaw	Comment
	boat owners to join at some entry level. There is a danger that we will end up making boating the reserve of the well healed middle classes. When I started boating in the 1970's I did so in an old wooden boat on a shoestring budget, using free moorings and goodwill to get through the early years. We really need to consider who would consider taking up boating with these proposed bylaws. The problem as I see it is that the cost is fixed and bears no relation to the value of the boat. Therefore proportionally disadvantaging the low cost starter boat owner.
	WI are giving themselves too much police powers and not serving their customers. no commitment to make improvements
	The waterways of Ireland are for every person in this country and WI should Not become a Tax collector from the Boating community. The Majority of the boating community pay enough in fees to their respective marinas, which contribute to the wider local economy. There are some who wish to spoil that by harbour hogging and do not contribute to the wider community
	I am finding that Cruising the Shannon is becoming less attractive.
	All boats should be registered and insured.
	IWAI should insist that ALL users of the waterways should be asked to pay their way or else nobody should have to pay! WI should be funded out of the general taxation collected by Revenue in BOTH jurisdictions. That would be a much simpler model of funding. Private boaters should not be the only ones who are charged to use the waterways. Commercial users on the other hand should pay a proper commercial rate for the facility that they are using, be it a berth or quay or any other infrastructure located on WI property, such as a container or portacabin or vehicular access to ferry passengers or to vend takeaway foods etc
	Boat owners are the consumers of the service and should be treated accordingly
	I was not aware that there was major problem with the existing byelaws. Normally when laws are changed there is a lead in, where by the existing laws were not working and there was a public outcry for something to be done. NOT THE CASE WITH THIS LAW CHANGE.
	Overall i believe the proposed updates are not unreasonable and are a move to a more modern regime focused on the user paying ideology while also starting to protect the environment and the actual natural and national asset
	If present rules are enforced no need for change. I thought this is a an all Ireland company if so same rules apply to all. Collect lock



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Byelaw	Comment
	fees using card payment, if you use it you pay. No regeneration fee this is a cop-out and if like motor tax. As the number have reduced on the river we need to encourage boats not discourage. ie on one day only five boats moored in Carrick
	Facilities should be in working order in all public harbours, towns/villages. Other users walkers, fishermen, canoeists , jet skis small crafts , cyclist , campers etc. Don't pay. Other users should be encouraged to use waterways and pay to support local businesses and increase local tourism and keep villages alive. IWAI should write an alternative version of bye laws- Rules should be simple and exclude rules covered by existing legislation on fire, electricity, pollution etc. WI should be promoting and increasing the use of waterways not discouraging boat use. Hire boats are not counted in 5 day rule all boats should be accounted. Hire boats should not be allowed to use public moorings where there is a hire base. Harbours should be extended to cater for more and bigger boats. For public consultation I have not seen any media advertising for the bye laws seeking submissions from the public non boat users as this will impact local businesses, villages, towns on the system
	Money raised should be added to the Basic Annual Funding (Not Capital), currently split 85/15 % between the two jurisdictions, used to maintain the actual Navigations. Navigations defined as water between the banks on the Canals, Canalised approaches to Locks and water between Navigation Posts/Markers on Lakes and Rivers. Also used to carry out on-going maintenance on Locks, Mooring Posts, Overflows and Feeders. Capital Funding is assigned to specific projects in jurisdiction from whence it came. (GF Agreement) DFI Capital for specific job cannot be diverted to another job nor can it be diverted to ROI jurisdiction. Many Capital Projects could be termed as 'associated boating facilities'.
	Insurance and fuel costs and safety costs with inclement Irish weather means better value outside our waterways
	All vessels on the waterway should be registered, with free registration for fishermen who are exempt of payment. All owners should be traceable and liable for any damage they cause
	There must be a greater incentive for boat owners to pay the registration fee. In return for a fee, basic facilities must be provided meaning bins for boat owners (even if an additional fee is required), harbour hoppers must be policed, speed limits must be enforced. We are being asked to pay a sum of money without any guarantee of an improvement in the service provided by WI



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Byelaw	Comment
	Erne based boats should not have to pay to stay on the Erne Belturbet particularly as part of the public mooring is not provided by WI. Northern part of SEW is in Northern Ireland
	Having lived and worked on the Shannon for over 50 years I feel it is a little less ours and more "theirs" (i.e. Waterways Ireland). On my day to day dealings with Waterways staff I find they are consistently non -engaging, non-interested and quite rude (lacking in basic people and communication skills).
	The introduction of fees will be the catalyst for further fees and fines going forward in the years ahead, The Present CEO is presenting this with a P.R team, WI will not be self-funding, but these changes are opening the way to property management of public property and will ultimately lead to the greatest decrease in vessel traffic for 170 years over the next ten years, The shambles that occurred after the bye law changes in the Eastern region, ie Grand canal, Barrow and Royal 8 years ago has not been fully assessed. The reality is the boating numbers collapsed!!
	Every boat should be registered to a particular marina. It is boats with no fixed abode which are the perennial harbour hoggers
	As a liveaboard in Lough Erne, and with 9 years experience of mooring several other places including England, I appreciate we must pay for our services and the upkeep of this fantastic waterways . Boat owners must realise the cost of the WI services has to come from somewhere and be responsible for their vessel
	The Shannon River and lakes belongs to the people of IRELAND and the proposed fee is double taxation
	IWAI need to work with rather than against WI to come up with solutions. Eliminating harbour hogging should be a priority
	WI want to get rid of lesser quality boats. Ie boating for the rich. Not on
	I welcome the new byelaws. I am not heavily opposed to any issues. Unnecessary blocking of Waiting Berths should be specifically prohibited in new byelaws.
	As a non-boat owner myself, just coming for vacation on hire boats, I would be fine with paying a fee for boating as well, like I have to do in other countries for staying in Hotels in the form of a tourism tax. Infrastructure has to be funded, not just by locals.
	If we want to have good well-maintained facilities realistic fees must apply. Our hobby should not be a burden on general payers Old wrecked boats cluttering up harbours be got rid of.
	We are based on the Woodford canal and use upper lough erne and the state of the hedges along the canal are a disgrace. And the



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Byelaw	Comment
	lack of lights and shore power at the likes of Crum and trial bay are unacceptable. And until the likes of this is resolved we won't be paying any additional fees
	If we have to accept these new Rules then enforcement, enforcement, enforcement so it is a level playing field. Finally I don't see why fishing boats should get a free Pass, they use the facilities just like the rest of us
	At meetings I suggested whatever the fee is, that it should be payable monthly by DD if that is desired. A major 'think' is needed to capture fees from Camper Vans who are using marinas - in some cases more than boaters. Lastly why are WI spending so much on new jetties eg Kilmore/Watermill on Lough Erne where the beneficiary is really a business. Lastly, it will be a nonsense if Lough Erne boaters can come to Belturbet if they may be exempt from fees. Many, many boats come (and they're welcome) so there has to be an equity consideration. Thank you for putting this survey together. More work for you!!
	The problem with boat owners is they have never had to pay properly for the fantastic amenity of the Shannon and think it is their divine right to continue to not pay. Tourists and persons who have their own mooring are treated with contempt by 'liveaboards and 'hogger's ' whom use the public facilities as theirs to do as they please. They always have a sob story of how 'its not fair on them' and 'its alright for somebody else' . Start running the Shannon as a business, improve the services and charge accordingly. Those whom abuse the facilities by overstaying should be fined (like a parking fine) and if persistent or belligerent about it, they should be impounded (Lifted & Removed if necessary). If you want to abandon your boat each weekend in a public mooring as you journey the length of the river over the summer, you should be fined each week for the overstay. If you can't pay or won't pay, there is no point in having a boat and clogging up the Shannon on those who want to use it.
	If we want a good navigational system there has to be a cost for every user and there must be rules to maintain it fair for all users. However, WI must provide good facilities 12 months of the year and I would like to see a more proactive approach from WI on how the revenue will be spent for the benefit of the users.
	Ireland is a very expensive place to staycation and very expensive for weekends, but collectively boaters spending power in small towns and villages is massive. Any additional charges to an already



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Byelaw	Comment
	expensive hobby, makes me think we are better spending on foreign holidays.
	Registration fee and the need for insurance should apply to all waterway users. There should be no exempted interest groups eg anglers. A graded registration fee should be applied ie smaller fee for small boats, this would make it less prohibitive for small boatowners such as anglers and RIB owners. All boats should be registered and display a number that is legible from a distance. This would enable boats breaking bylaws to be identified and reported. New byelaws should be enforced more consistently than current ones are
	Those making these changes do not seem to comprehend the physical scale of the Shannon Navigation and the practical realities of keeping a boat on the system (including weather) or the lack of commercial facilities or the planning difficulties faced by developers of additional or extended facilities.
	WI should receive a government subsidy from the revenue they collect from Diesel Duty. They enforced a rule to ban red diesel in pleasure craft so they should use some of this to fund WI. It's an equitable way of doing it as the people who use the waterway the most pay the duty.
	All boats, sailing, rowing, fishing, paddle boards, canoes etc. (except jet skis and power boats over 10hp.), under 7m should be exempt from levy, as it will discourage people from using the waterway. It will discourage outside visitors to sailing schools, regattas etc. They are the future customers who will probably buy larger vessels in the future.
	The waterways are a great resource and their use by all should be encouraged. Some annual fee is warranted but should not be prohibitive or such to discourage new water users. Any monies raised should be used to improve services and facilities. More long term mooring facilities at reasonable rates are required. A lot done but more needed.
	I happen to think ALL those changes are a GOOD idea. If we are serious about proper enjoyment of the waterways, we must be prepared to make a reasonable contribution to their upkeep. Until more boaters use the waterways for 12 months it cannot be sensible to divert scarce resources into maintaining full facilities for the whole year.
	If WI is an all Ireland organisation the same rules should apply to all ie: All Ireland registration



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Byelaw	Comment
	These proposals are premature as there is a dual system in operation. We abide by the rules but there is a fleet of boats not registered and using council harbour to escape complying with the rules. I think WI needs to take control of the council harbours, which makes extra berths available, and maybe take the pressure off existing mooring space. It would also tidy up the harbours and remove the “ dumping ground” of abandoned and half sunk boats
	I appreciate that WI needs to get revenue and all those who can afford to pay should do so for use of the amenities on the water. A lesser annual charge applied to all craft left in the waterway might be fair and if possible the charge graduated based on the size of the craft.
	No problem with these regulations as long as rules are applied fairly
	Waterways Ireland are doing a very good job of managing the waterways and will support them as much as possible,
	Utilities should be available all year round in all locations especially if a fee is being introduced. No mention of the impact of commercial fee to marina owners for their use of the water, which will be passed to boaters. This means boaters will pay on the double. Once to WI (annual reg) and once to the Marina (the annual marina fee and the increased amount based on new fees)
	Permanent live aboard people should be encouraged and facilitated but with strict conditions any payment of €2000 plus annual licence fee. Live aboards who behave well and keep their boats in good order add life and vitality to the waterways and are a source of local knowledge to casual boaters
	We have lost a lot of services over the last few years through reduced lock opening times and reduced openings of Portumna bridge. We need these reinstated. There are lots of cases where boats never leave Lough Ree. Sailing cruisers, sailing rescue boats, etc.
	I agree with most of the proposed changes
	WI as the sole Inland Navigation authority is in a monopoly situation, is this not a breach of the monopoly regulations?
	A recurring theme in my own discussions with folks is that WI seem to be responding more to pressure from certain commercial interests than is appropriate. IWAI studies would suggest that the contribution to local economies by the leisure boating community is at least as important as that made by the hire-boat community. Pressure from marina owners about WI undercutting them by providing winter moorings seems somewhat fallacious. There is



Inland Waterways Association of Ireland (IWAI)

Survey results and Members Written Feedback in relation to the draft Shannon Byelaws

Byelaw	Comment
	quite a bit of pressure on marina space on the Shannon – as shown by the significant price rises in certain areas. An unintended consequence of the proposed change could be to reduce the number of customers for businesses in these locations as users simply choose to go elsewhere
	We are in basic favour of two of the main proposals, the annual fee, and the enforcement procedures. We recognise the necessity of an income stream. The proposed €200 seems reasonable, with the provision there is no method for it to increase thereafter, something that could put boating out of the reach of many. If it was to be amended so it could rise or fall in line with inflation to maintain the income stream we wouldn't object. The enforcement method proposed is very obviously necessary, dangerous use of jet skis at Coosan point being one instance we are personally aware of
	Having read the draft proposed amendments to the Shannon navigation bye laws, I fully concur with the changes proposed
	I have been boating long enough to remember the scourge of 'harbour hogs'. I was very pleased on our recent trip in June to Lough Derg where we visited almost all the harbours bar Killaloe. We found free berths in all the other harbours we visited. It was completely different 10 years ago. I know this was due to winning that High Court case and all the hard work of the Waterways Ireland staff. Keep up the good work.
Interpretation	'boat' - preferential treatment being extended to fishermen, specifically their exemption from licence fees, seems unfair
	Fishing boats should be included
	All vessels and boats should have to be registered, even if some are them exempt from paying the annual registration fee. This would allow for identification of craft involved in anti-social behaviour
	'boat' the 30HP limit is too high. The existing 15HP limit is about right. A 30HP rule would allow too many boats be outside the system. If there is an issue with tenders, let them be included on the main registration some way, for a small extra fee and issue an associated number. Say 1356 for the barge and 1356T for the tender. It seems inconsistent to me to completely exclude angling boats for several reasons: there are some really big competition angling boats around with really big motors; The argument that angling boats don't use locks and bridges is fallacious. Many of them do. The argument that WI don't want to get involved in another rod licence war (which I have heard from within WI and also from



Inland Waterways Association of Ireland (IWAI)

Survey results and Members Written Feedback in relation to the draft Shannon Byelaws

Byelaw	Comment
	<p>within the angling community) smacks very much of giving in to bullying which doesn't seem appropriate for a reputable organisation.</p> <p>Some angling boats, even with fairly modest motors, are among the worst offenders when it comes to wake etc. If they are not even registered, how can WI hope to regulate their behaviour? How will WI test the definition of "craft exclusively engaged in angling"?</p>
	<p>It seems inconsistent to completely exclude angling boats for several reasons: (a) there are some really big competition angling boats around with really big motors. (b) The argument that angling boats don't use locks and bridges is fallacious. Many of them do (c) The argument that WI don't want to get involved in another rod licence war (which I have heard from within WI and also from within the angling community) smacks very much of giving in to bullying which doesn't seem appropriate for a reputable organisation (d) some angling boats, even with fairly modest motors, are among the worst offenders when it comes to wake etc. If they are not even registered, how can WI hope to regulate their behaviour? (e) How will WI test the definition of "craft exclusively engaged in angling"? If I define my barge as being "exclusively used in angling", how would the inspector know otherwise? I'll just say "I'm going out to where the big ones are. Look, here's my fishing rod and landing net</p>
	<p>Heritage Boat - This definition is taken largely from the Heritage Act and is reflected in the HBA Constitution. However, it is potentially too restrictive for the purposes of these bye-laws. There are many vessels on our waterways (e.g. Dutch barges, RAF Fast Refuellers, Humber Keels, Leeds & Liverpool Short Boats, Dunkirk Little Ships etc) that are of international significance and they should be included here in some way. Just re-phrase as: "because of its intrinsic construction or because of its commercial, cultural, economic, industrial, military, political, social or other history".</p>
	<p>While this covers jet-skis and other wet-bike types, it doesn't include those remote controlled devices that appeared a few years ago that you could water-ski behind. It could be argued that it doesn't include the jet-skis modified as a power source for those water jet devices. Perhaps sea/float planes should be included too. Might need to generalise a bit more</p>



Inland Waterways Association of Ireland (IWAI)

Survey results and Members Written Feedback in relation to the draft Shannon Byelaws

Byelaw	Comment
	Navigation – need an interpretation for Navigation property similar to the one for canal property in the canal byelaws. Makes no sense to talk about vehicles in the navigation
	Replace the word “Master” with “Skipper” throughout.
	master” is defined as a man with people working for them especially slaves and servants, or the captain of a merchant ship or a male head of a household, etc. “skipper” is used to describe the person in charge of a recreational craft. It applies equally to men and women and does not have the historical implications described above. These Bye-Laws should show the use of the word “Skipper” throughout.
	A “boat” is a vessel that is not a ship or submarine. Boats include barges that can be 60 feet or longer on our inland waterways. Boats of all shapes and sizes can be used for navigating water and are usually propelled by an engine, sails or oars. “Open Boats” describes the small vessels named here. Dinghies should be included in the list.
	“Vessel” applies to every type of boat or ship, big or small, propelled by engine, paddle or wind. It does include “small boats” like kayaks, dinghies, skiffs. Both the Irish Heritage barges from the 1920s/1930s and English narrow barges are referred to as ‘Canal Boats’
Regulation 3(2)(a)	Waterways Ireland representatives should not be able to board people's boats unless in an emergency.
	The fixed penalties are too high. We should also not allow WI staff to board boats without a Garda.
	Whom and what qualifications will the “authorised person” be required to have; this should be written into the byelaws
	How will the vessel be stopped? Is the use of force allowed? What happens if people don't comply? Who decides if it is safe to stop a vessel? It may be that an authorised officer is not qualified to ask a particular vessel to stop. Eg asking a vessel to stop in a strong flow or heavy sea could well be hazardous. If a master does stop a vessel in dangerous circumstances, and gets into difficulty, who is held responsible?
Regulation 4	There's a presumption here that the direction is safe. The master is responsible for the safety of his vessel so if an unreasonable direction is given, who decides?
Regulation 5	WI is cross border and free movement across the border is a right not a privilege. Therefore I believe it to be wrong to charge. Car drivers are not charged.
	This clause effectively bans NI/ERNE registered vessels from entering the Shannon. This seems perverse and contrary to the spirit of the Belfast



Inland Waterways Association of Ireland (IWAI)

Survey results and Members Written Feedback in relation to the draft Shannon Byelaws

Byelaw	Comment
	<p>agreement and the basis on which WI was founded. I think any attempt to stop Erne registered vessels for failing to have a Shannon registration would generate considerable political attention and cause significant ill will towards WI. I do understand that as things stand at the minute, with Stormont in limbo, introducing revised bye-laws on the Erne to include a similar registration process and fee is problematic. Is there a plan to stop boats at L2 on the SEW, ask them to pay €200 Euro and issue a registration on the spot? If Erne boaters are required to apply for a registration in advance (however speedy the process) it makes somewhat of a nonsense of the “go as you please” nature of inland waterways boating that we all espouse.</p> <p>Erne registered vessels harbour hogging in the Belturbet area can be dealt with simply using the fixed penalty process followed by impounding if necessary.</p> <p>It should be possible to devise a process whereby NI registered vessels can get a 1 month “visitor” waiver whereby the details of the vessel are captured at some point as they enter and leave RoI and they can then be followed up if they breach the visitor permit terms.</p> <p>This clause also removes the courtesy extended in previous years to vessels with say a Thames or C&RT registration which seems a pity. This may be less of an issue though as these vessels typically stay for longer and so might be more pre-disposed to register on the WI system.</p>
Regulation 6(9)	Extending the use of the canals to Shannon registered vessels is a very sensible and welcome development
Regulation 8(2)	I think there may be a need to specify this more clearly. E.g. sailing vessels do navigate above Portumna Bridge today. Perhaps WI should define in some publication where the “Mast Up” areas are or get it added to the charts.
Regulation 9(2)	There seem to be a few places where the distinction between owner and master is unclear. This needs to be resolved. As well as defining “master” in interpretations, maybe the “owner” needs to be defined as the person in whose name the vessel is registered.
Regulation 12(4)	Need a caveat here. A deep draft vessel e.g. may not be able to move over in a narrow channel.
Regulation 12(7)	<p>If this were to be enforced rigidly, there would be boats tooting and hooting all over the place. Most users wouldn’t know what the sound signals mean. Especially hirers.</p> <p>May be time to ditch this bye-law entirely or modify it with words like “where circumstances require”</p>
Regulation 12(11)(a)	There’s a major inconsistency here. The definitions at the start define the “Master” as the person in charge of the vessel for the time being. So if a 15year old is at the helm, they are the master. This should say “Owner”



Inland Waterways Association of Ireland (IWAI)

Survey results and Members Written Feedback in relation to the draft Shannon Byelaws

Byelaw	Comment
Regulation 12(11)(a) & (b)	By these clauses, a 14 year old could be left in charge of a 70tonne barge with a 120HP engine. In the GC Draft Bye-Laws, a 16YO is limited to a vessel or boat under 10HP. Maybe that's what we need here. That would also cover PWCs. I feel that it would be clearer if these rules were moved to the "Crew" section under clause 9
Regulation 12(12)	More clarity needed here. Need adequate arrangements for dealing with vessels operating in the seaplane zone.
Regulation 12(13)	Concern that this regulation could be overused to prohibit vessels from sections of the navigation
	Publishing a notice in one local newspaper is entirely inadequate in today's environment. It requires broadcasting on all main social media platforms and via the MN process. Signage prohibiting an activity or relating to zoning must be very clear and obvious. A printed copy of a Marine Notice is entirely inadequate.
Regulation 13	May need to be a clarification as to whether speeds given in this section refer to speed through water or speed over ground. Suggest keeping both "kph" and "knots" in text for vessels with logs whose units can not be easily changed.
Regulation 13(2)(a)	I think these clauses need to be re-framed in terms of "No-wake" zones. It's done elsewhere in the world and works fine. I agree jet-skis and some speedboats generate little wake at high speed but I think they can be dealt with in other ways by imposing speed limits as well.
Regulation 13(2)(b)	This has always been problematic. Many vessels would have no steerage at 3kts. For some vessels, tickover speed is greater than 3 kts. To maintain 3kts would mean taking the boat in and out of gear and could result in loss of steerage at a critical moment. 3kts might not be enough to make headway in river sections in conditions of high flow.
Regulation 13(3)	The intention behind this clause is fine but again, may not be practical in times of high flow and for some vessels
Regulation 13(3)©	Private marinas around Lough Derg and other areas are operating at full capacity, with some being particularly selective about the size of boats they accommodate. Larger vessels invariably command higher fees. Removing public winter moorings could inflate prices at private marinas due to competitive pressure brought on by supply and demand imbalance. Public winter moorings should not be misconceived as equivalent to private, year-round moorings. They are available for a finite duration and offer a limited array of services.



Inland Waterways Association of Ireland (IWAI)

Survey results and Members Written Feedback in relation to the draft Shannon Byelaws

Byelaw	Comment
	Nevertheless, public winter moorings offer essential support to those waiting for private vacancies. They also serve to somewhat stabilise prices by providing an alternative. Moreover, they facilitate those with smaller boats and tighter resources to partake in their hobbies and explore the navigational routes. A fixed penalty of €150, in conjunction with the confiscation of boats by (WI), could effectively combat the issue of harbour hogging and breaches of winter mooring period limitations.
	Winter mooring should still continue on the system - where it is safe to do so
	Winter moorings should not be allowed at any cost as it encourages harbour hoggars as they have no fixed mooring. Also it is a commercial reality that WI are in competition with Marina owners which should not be the case
	Winter moorings can provide a level of safety to a marina For emergencies and the protection of facilities it can give a level of security to an area by a known local.
	If I did avail of winter moorings on the Shannon, yes, I would be willing to pay commercial rates for a 4-5 month period.
	I don't currently avail of winter mooring, but would definitely pay more but don't understand what "commercial rate means" I would just want water and pump out available
	Getting rid of winter mooring will make many people homeless. The people who avail of winter mooring are generally single older separated men. Their boat is all they have.
	Winter mooring should be facilitated where appropriate and commensurate fees charged. These fees should be dependent on facilities supplied. There is scope and opportunity for creating safe and serviced berths at various points along the system
	Who is going to nominate the specific harbours with utilities for winter mooring and will these communities affected have a say. While happy to pay a reasonable fee - I am comfortable with the wording "commercial rate" for the 5 month winter mooring
	Paying commercial rates for winter mooring in a public harbour? This is very wrong, the public harbour is that public belonging to the public, we already own it as members of the public. A private marina provides repair facilities, mechanics, security, privacy, exclusivity of mooring etc. A public harbour is tie to a wall or jetty at your own risk if you can find a spot and you may have power, the showers will be off for winter, no waste disposal. The 2 are totally non comparable



Inland Waterways Association of Ireland (IWAI)

Survey results and Members Written Feedback in relation to the draft Shannon Byelaws

Byelaw	Comment
	Winter mooring should be at a significantly higher rate to cover costs but also at a similar rate to private marinas but should have all amenities
	Retain winter mooring
	Winter moorings needs to be revisited, with all terms and conditions included in writing in the new byelaws
	<p>Removing the winter mooring period is a mistake. The argument that WI are undercutting private marinas is somewhat specious given the limited number of spaces available overall, the apparent unwillingness of marina operators to offer winter only berths and also the difference in services offered. I think WI should designate a number of harbours in each area for winter mooring and charge a fee commensurate with commercial rates with the services left running. €100/month doesn't seem exorbitant. By restricting the service to a few locations, the management of utilities can be more confined to these locations and the fixed penalty notice system can be used to deal with abusers.</p> <p>The question of the abuse of power bollards is important but there are technical solutions such as the use of smart-phone technology as already exists on C&RT canals in the UK.</p> <p>The €100/month can be added to the schedule of charges.</p>
Regulation 16(1)	Adequate clearance under the keel makes sense but how do we know? Do all locks have accurate depth gauges on both sills outside the gates? Ideally they need to be some distance clear of the gates to allow you time to change your mind!
Regulation 16(5)(f)	This may not always be practical in some older vessels with more complex starting routines (e.g. Bolinders or hand-cranked engines). A clause about "save with the permission of the lock-keeper" would make life easier for those vessels.
Regulation 17(2)(a)	I think there's an implementation issue here. There have been problems in the past where the notice hasn't been kept up to date and the passenger craft arrives unannounced and seeks access. The onus should be on the passenger boat operator to do this and they can't insist on the use of the berth if the notice isn't there or correct.
Regulation 17(2)(b)	Needs to be monitored. A notice in 12pt type is not visible from a boat pulling alongside. Should the bye-law specify the typeface and size. Maybe 70mm high letters similar to a car number plate?
Regulation 17(3)(a)&(b)	As an Irish boater who often cruises our inland waterways during the boating season I need to moor up for six nights when I go back to work for the week. This facility encourages boating. This would



Inland Waterways Association of Ireland (IWAI)

Survey results and Members Written Feedback in relation to the draft Shannon Byelaws

Byelaw	Comment
	exclude my annual summer holiday when I don't stay beyond the five day limit. Having this facility means I bring income to business owners in all the places I stop.
	The existing 5 day mooring rule is sufficient - if WI carry out regular and effective enforcement
	Reducing 5 day rule to 3 is not managing the problem head on. Action needs to be taken on people taking advantage rather than changing the rules. no one like change, I hope the feedback being received is thoughtfully reviewed and changes made where necessary
	My main issue on the Shannon is Harbour Hoggers. If tighter rules and increased fines are imposed I would fully support that
	The 3 day rule in 8 harbours should not be written into the byelaws as this cannot be changed as statistical trends of river usage evolve over time. Instead, these locations should remain as 5 days and imposition of 3 day rule where necessary should be done through marine notices annually
	The 5 day rule should be applied with compassion toward weather conditions. 7 days would give people who stuck in a harbor to deal with problems without additional pressure
	Whatever is agreed on mooring restrictions MUST be enforced.
	Boating on the Shannon is going to be the reserve of the Hire boats and retired boat owners if the new byelaws are introduced. It will be impossible to explore and enjoy our waterways if the new byelaws are introduced. For those of us that work, the 3 day rule will be unworkable
	5 day rule is working fine
	5 day rule does not work, a 6 day rule would better allow people to remain compliant. 3 day rule is not warranted once WI have recourse to fines.
	I believe that mostly the bye laws are fair with the exception of the 5 day rule. If you are cruising the waterways and have to go home then it is not fair to expect you come back within 3 days. Not everyone is retired.
	WI is doing a great job with reducing harbor hogging, a 3-day rule would make everyone's life very difficult.
	Keep the 5 day rule and enforce more vigorously.
	As much as I agree with the 5 day rule, currently local moorings are not being supervised or the 5 day is being ignored. Why can't I moor for more than 5 days when other boats are with no penalties??



Inland Waterways Association of Ireland (IWAI)

Survey results and Members Written Feedback in relation to the draft Shannon Byelaws

Byelaw	Comment
	There are far too many people hogging moorings on the system. All boat owners should a permanent private mooring, this will allow boats to get the chance to actually moor up over night at busy locations. Moored at C on S, got last space at public moorings, yet half the boats were empty and it was a Wednesday evening.
	5 day mooring period should be extended to 6 or even 7 days to encourage more extensive network cruising by the working population
	All use of the waterways system is weather dependent 1. the river floods and often has a strong current which can be difficult to manage.2. In windy conditions the lakes can be rough, frightening and dangerous. It would not be reasonable to intimidate river users into moving every 3 days. There should be latitude shown to boat users who are onboard. Differentiate between boats in use and boats left in harbours unattended until the weekends
	The 5 day rule should be increased to 6 days
	If the 3 day rule is to be used in the busiest harbours that it be used only for the Peak months.
	The traffic on the river is down 60% over the past 15 years according to figures from the lock keepers, there is lots of space in the harbours so the 3 day rule only exists to force people into private mooring which are currently at capacity anyway. This is a very cynical move on WI part
	The five day rule should be extended as if for instance you went to the Shannon from the Erne and had to work during the week. With notice to the warden, boats should be exempt for at least 14 days. Also boats moored at public jetties are a tourist attraction.
	The 5 day rule is too short. If I am moving my boat along the Shannon in stages I can no longer leave it on sunday night (day1) to go back to work, return the following weekend as day 5 is Friday and It could be too late in the day to move after work . Plus if the 3 day is enforced then the longest I can stay in Boyle / lough key area is 8 days and not return for a month. That doesn't cover a 2week holiday . But also the people in lough key private marina can't use their local waterway harbours, as after the first 3 weekends every month, they'll have used all the 3 day rules in that area(this will apply on the big lakes too) so basically hard working people will be confined to their marina and occasionally their local area, therefore we might as well just get a floating home in the Marina as only the unemployed, retired or locals can roam the system. Plus a percentages of them are also harbour hoppers so it



Inland Waterways Association of Ireland (IWAI)

Survey results and Members Written Feedback in relation to the draft Shannon Byelaws

Byelaw	Comment
	will not guarantee there will be space at waterway Ireland jetties for everyone. Also everyone who is making these decisions should own a boat in the system. So not even the rivers in Ireland will run free .
	I don't understand how WI can enforce a non movement fine on a river subject to strong flows. They cannot make people move if they're not capable of cruising the conditions. Navigation & facilities should be available all year round. 5 day rule should be relaxed to longer period in winter/flood conditions
	Public jetties should not be used by individuals trying to evade having a berth in a private marina. Sad to see hire boats and tourists not being able to tie up because some people believe it is up to the government to provide them with free berths.
	The 5 day rule favours the local boat owner. They can leave their boat in harbours for an upcoming event and can be driven home by family leaving the boat in situ. I live in Dublin when I'm on my boat I always have to return to my marina. Say there is an event in Lecarrow, I might arrive in this harbour on a Friday only to find no berths available. The 3 day rule may put a spanner in this racket
	5 day rule is crazy if you work Monday to Friday. More focus and time needs to be spent maintaining and controlling water levels on the Shannon
	Practices such as harbour hogging should be vigorously outlawed
	Five day rule should apply but how will days be recorded ie when they are recorded by inland waterways inspector which could mean if I stop for shopping I could be recorded as One day
	3 day rule will destroy any good will with boaters who use the system.
	One of the most irritating things about our waterways is "harbour hogging" and giving powers to Waterways Ireland to deal with this should be promoted in every way possible.
	5 day rule is working fine. Why change on the Shannon?
	There is a fairly widespread view that with the introduction of the fixed penalty notice process, WI do not need to further restrict the number of days that folks can moor at certain harbours. WI will have adequate powers to deal with troublesome harbour hoppers without penalising (some would say criminalising) genuine users
	Change to the 5 day mooring limit / removal of wintering. We broadly support this if it is based on the verbal explanation given at one of your information sessions that this is to facilitate a longer season. However, flexibility is vital. Boats can and do breakdown away from home base, necessitating a lay-up at a public harbour



Inland Waterways Association of Ireland (IWAI)

Survey results and Members Written Feedback in relation to the draft Shannon Byelaws

Byelaw	Comment
	<p>while repairs are arranged. There must be a means to facilitate this. We were assured verbally a “sympathetic eye would be turned” – we feel that’s not enough, facility should be inserted into the bye-laws. We are ambiguous on the other effect of this – the ability to cruise a greater area of the river by “harbour hopping” from weekend to weekend. We don’t currently do this but know people who do</p>
	<p>This change is unwarranted. What it does in effect is further criminalise those who want to cruise the full extent of the waterways over a period of weeks or even a season.</p> <p>The argument that pressure is coming from the hire fleets fails to acknowledge that their users are no different from any others or that private users make at least as much a contribution overall to local economies as do hirers. The right of one group to run a business does not override the rights of the rest of the population to enjoy the publicly provided amenity.</p> <p>WI will have adequate powers under the terms of these new bye-laws to deal with those abusing the system</p> <p>The reduction to 3 days in some harbours is entirely unjustified.</p>
	<p>This rule has always been unjust for the reason stated above and with the introduction of the fixed penalty notice, effectively criminalises those who wish to navigate over the entire system in a series of weekends. A more equitable rule would have changed the 5 days to 6 days which would allow vessels to moor up from Sunday PM to Saturday AM as they work their way around the system.</p> <p>A possible work around might be for a clause to be added to this bye-law at the end thus:</p> <p><i>“.....for more than 5 consecutive days or more than a total of 7 days in any one calendar month without the permission of Waterways Ireland - which permission will not be unreasonably withheld”.</i></p> <p>There also needs to be a recognition that for weather or water level reasons, or indeed for personal or family reasons, breakdowns etc it may not be possible or safe to move a vessel within the time-limits given. Again, there should be an explicit recognition of this within these rules.</p>
Regulation 17(4)(b)	<p>There is an issue in some locations where there is really inadequate mooring above or below locks and people need to tie to the bank or whatever.</p>
Regulation 23	<p>WI staff indicated that this bye-law was not intended to apply to occasional commercial activities carried on by voluntary</p>



Inland Waterways Association of Ireland (IWAI)

Survey results and Members Written Feedback in relation to the draft Shannon Byelaws

Byelaw	Comment
	organisations such as IWAI, HBA, RNLI, community groups etc. This distinction should be made clearer.
Regulation 25(3)(a)	WI should be allowed keep the excess funds. At least after a year and a day. It may cause accounting difficulties into the future if WI are required to keep such funds in some kind of dormant account in perpetuity because they show up as a liability in the books.
Regulation 28(3)e)	More pump outs and kept in working order
	I would agree to a 3 year lead in period for the fitting of holding tanks, if there are enough pump out stations/facilities available, but there are not
	My boat is fitted with a 20litre chemical cassette toilet. This was said to be satisfactory by WI before having it fitted. I would like to see more disposal facilities for this waste
	There should be a grant to change over to a holding tank in boats without tanks
	Boats not fitted with holding tanks should be required to carry portable toilets
	I think holding tanks should have to be installed if there is room in the engine bay/bilge from them. I vessel is small and would require holding tank in a cabin etc that should be exempt.
	The holding tank requirement is not viable due to inadequate working facilities, resulting in mass chemical dump in one place more likely. A macerating pump withholding toilet paper is much more environmentally friendly with only occasional powder being discharged, and no chemicals.
	In respect of the holding tank requirement. If WI is seeking to introduce this than the appropriate number of working/serviced pumpout facilities must be put in place at the Harbours
	Holding tanks should be grandfathered with new registered vessels requiring them
	I agree with the proposed holding tank regs.
	To bring boats into compliance a grant similar to septic tank grant should be introduced
	If holding tanks become obligatory pump out facilities MUST be improved first and obligated in all marinas
	I think smaller old crafts should be exempt from installing holding tanks as they do not have the space and it would affect the structure
	All shaft drive boats leak - what about pumping out of bilge water?
	Boats with a shallow draft cannot fit holding tanks. It would be unfair to force them off the river on account of this



Inland Waterways Association of Ireland (IWAI)

Survey results and Members Written Feedback in relation to the draft Shannon Byelaws

Byelaw	Comment
	Boats that were designed without a holding tank generally do not have anywhere to put them, It should only be a requirement that boats that were designed to accommodate them and should have a 3 year lead time to fit them. All new registrations should require them also with the exception of older boats as if this is enforced it will cripple the second hand boat market.
	Holding tanks are not necessary on the lake, most owners rarely use the holding tank for solid waste and are moored every evening at harbours and prefer to use toilets there. As has been the case regularly, the pump-out stations are not working or blocked by boats moored there sometimes two abreast. It will result in large quantity of solid waste being dumped out in the open water.
	Again regarding the holding tank there needs to be plenty pump out working facilities for the system to be fair and workable.
	Inadequate pump out facilities to deal with volume of boats.
	If enforced, there should be a grant aided scheme to retrofit a holding tank
	A macerating toilet with no paper exit is actually much more environmentally friendly than using a chemical holding tank
	Section 40 specifically prohibiting discharge of toilet waste simply restates, positively, requirements of existing clause 28.1 (h), so there should be no need for "grandfathering"
	WI should provide adequate facilities for disposal of chemical toilet waste. Currently there's one such facility on the entire length of the Shannon at Castle harbour in Portumna. They should start by reopening the facilities previously available at Boyle, Leitrim and Dromod. It is unreasonable to insist on no effluent being discharged in the waterway unless adequate disposal facilities are provided. Not all boats have capacity to fit a holding tank. Any lead in should include a plan to provide adequate facilities for the disposal of both chemical toilet and holding tank waste
	More pump out stations required. at least one in every harbour
	On the holding tank issue, I would suggest holding tanks should only be required on the canals, Live aboard boats and obviously new boats but in our case we have a very old boat which would be very expensive to convert and is only used 1 to 2 weeks a year. A bullock drinking water from the Shannon would put more waste in a day into the river than we would in a week.
	We need way more pump outs. Athlone has no WI pump out. In fact, there is no WI pump out from Lecarrow to Shannonbridge. We have one at the Council run Town Marina and one privately



Inland Waterways Association of Ireland (IWAI)

Survey results and Members Written Feedback in relation to the draft Shannon Byelaws

Byelaw	Comment
	owned pump out at Quigleys Marina. Both have very limited availability.
	More flexibility is needed regarding the time frame for installing holding tanks
	Holding tanks. This is probably past due. It will involve expense for a huge number of boat owners, but the days of untreated discharge should be behind us. Before this can come in though there needs to be investment in the pump out facilities. These are insufficient in number and often such that are there are inoperative. This needs to apply to private marinas also – all such facilities should be obligated to provide pump out, recycling and gash facilities.
Regulation 28(4)©	Regarding organised events, will written permission from Waterways Ireland be required for all organised events i.e. walkers, cyclists, fishermen and boaters?
Regulation 28(5)	We agree with leaving no waste on the navigation, BUT to enable people to do this, they must provide bins! Even if we have to pay for them using the smart card to prevent abuse of the service. When we leave our base for more than a weekend this is a real issue for us as we have 3 young children on board - 2 are 2 & under so still in nappies! Kids create SO much more waste & when on our 2 week holiday at the other end of the river, it's not practical or safe to carry 2 weeks worth of rubbish around! We recycle & manage our waste but it's hazardous carrying 2 weeks worth of rubbish on board!
	Waterways and local councils should cooperate to provide a waste disposal facility at all harbours and not just some harbours At the moment in some harbours camper vans get a waste collection facility and boats don't
	The omission of a strategy on bins, rubbish disposal and recycling on the system is of most concern. There also needs to be greater enforcement of byelaws new and existing on the Shannon. There is far more warden and police presence on the Erne.
	Investment is needed on more available waste (bin) disposal at all public jetties. Also public and youth openly using jetties andslipways for sunbathing/swimming is very dangerous and should be enforced that waterways jetties are for boat users only
	Rubbish facilities should be available in WI blocks in a system where users pay using a smart card. This should be widely available



Inland Waterways Association of Ireland (IWAI)

Survey results and Members Written Feedback in relation to the draft Shannon Byelaws

Byelaw	Comment
	Rubbish facilities should be added to WI blocks in a system in which the boaters pay via their smart cards to dispose of rubbish. This should be widely available in multiple locations
Regulation 28(7)	This really should be a separate clause. It's nothing to do with biodiversity. Need a clearer definition of what constitutes an "Event". A major boat rally is probably an event. What about a cruise in company? How many boats are needed to make it an event? What sort of land-based activities would constitute an event?
Regulation 28(8)	This seems like serious overkill. Also need a clearer definition of "diving". Does it just cover SCUBA diving? What about snorkelling or free-diving? What about divers with surface fed air? I understand that there is a potential issue with people diving on archaeological sites but it's unclear how this helps. The ill-intentioned will dive anyway. This prohibition would cause serious difficulties for people with fouled propellers or lost gear.
Regulation 28(9)(a)	Swimming is common around harbours in lots of places. Swimming near and around bridges is a bigger problem in some areas e.g. Banagher. There is a case that this sort of wild swimming is traditional in some areas and should not be over regulated save where there are really serious h&s concerns. Regulating vessel speed and driver behaviour would probably be more effective than trying to regulate the swimming
Regulation 28(9)(e)&(f)	This is consistent with other national legislation but is somewhat impractical. Lots of people have dogs that are well controlled and left unleashed. There are also lots of uncontrolled dogs and dogs fouling public areas. Unclear how having this bye-law affects the dogs or owners behaviour in any way.
Regulation 28(9)(o)	A large number of vessels have diesel heating, this is not a smokeless fuel
	Smokeless fuels is beyond the remit of WI
	The clause on the burning of fuel that causes the emission of fumes, makes absolutely no sense, as all fuels emit fumes
	The burning of any fossil fuel causes some element of air quality deterioration (as does the running of any engine). This really should refer to the use of smoky fuel such as bituminous coal, turf and wet wood.
Regulation 29	This whole section needs a re-think. I know it was in the earlier bye-laws, but times have changed. There is a much higher expectation on the part of the public that state agencies are seen



Inland Waterways Association of Ireland (IWAI)

Survey results and Members Written Feedback in relation to the draft Shannon Byelaws

Byelaw	Comment
	to act fairly. Creating an appeals board or similar process would help that perception. Many state and other agencies have an internal appeals process before recourse to the courts. WI could create an appeals officer position (or contract to some reputable person or organisation to provide one) as an intermediate step.
Regulation 29(1)	Does this mean that if a District Court finds against a defendant, they don't have the right of appeal to a higher court?
Regulation 30(6)	What's the definition of "utilities"? Pump-out and Electricity today; water tomorrow?
Regulation 31 (4)	Not just a "boat". Should also be a "vessel" "caravan", "vehicle" etc.
Regulation 33	The dimension given here seem a bit OTT for some vessels. A 12metre rope on a small vessel would be overkill. 16mm diameter would be impractical on a small vessel. Why not just say something about "of such length and breaking strain as is appropriate for the vessel size and conditions". (You already do that for the anchor and anchor cable). All the reputable rope makers and chandlers will advise people as to what's appropriate. The rules in the new canal bye-laws are much more sensible.
Regulation 34 (3)(a)(i)&(3)(b)	Make it clear that this is Code Flag "V" from the international code.
Regulation 34 (3)(a)(ii)	Strongly recommend the removal of this requirement. Time Expired Pyrotechnics are a major problem for the public. The arrangements put in place for their disposal do not work. Chandlers will not take them back and Defence Forces and Gardai will not assist. TEPs can corrode and became extremely hazardous
Regulation 34 (4)(a)	May need to include a derogation to this for people involved in competitive rowing on racing shells and the like. In my opinion this should be with the caveat that there is a crash boat in attendance. If not, they wear a PFD.
Regulation 37	Harmonise these regulations with the Canal bye-laws
Regulation 37 (2)(a)	Fire extinguishers should be part of a boat safety scheme with 2-3 year timeline between certs
	Would a safety certificate similar to that in the UK be of more benefit than a yearly fire extinguisher check? This is carried out every 4 years with the boat in water and the surveyor will check a great number of things such as gas and diesel fittings, detectors, fire extinguishers and more. This information can be shared with WI by way of a database, they can issue navigation licences accordingly etc.
	I agree with the proposed wording



Inland Waterways Association of Ireland (IWAI)

Survey results and Members Written Feedback in relation to the draft Shannon Byelaws

Byelaw	Comment
	This fire extinguisher requirement to service every year goes back at least 45 years in British safety practice and has since been included by Irish safety practice. Works OK for large companies but not for boats as the cost of service is multiples of cost of new extinguishers. Suggest rewrite clause:- "be in working order, and be replaced with new extinguisher every 3 years or serviced every year and service recorded on them
	If a fire extinguisher fitted with a gauge is in the green why does it need testing this should be change
	A recommendation the owners check the gauges and give dry powder bottles a shake every year is probably all you can do. Apex or those would charge a fortune for this service and people just won't do it.
Regulation 38(1)	Grandfather right for gas installations (so many boats have inside gas lockers)
	We note this is proposed to align with a maritime directive. However, this is not possible for a huge proportion of the fleet. Boats (including ours) that are gas compliant for the standard applicable when built can only be brought up to the current standard at enormous trouble and expense. Bear in mind gas work can only be done by RGIs – there are very few of those available for the Shannon.
Regulation 41	<p>The requirement for CE compliance for new boats will:</p> <ol style="list-style-type: none"> Eliminate traditional craft boat building, Eliminate the building of a one off bespoke design, Due to the CE compliance this will eliminate all but the very expensive craft therefore excluding the ordinary middle earner from the enjoyment of our Inland Waterways. CE compliance will not eliminate the dangers of: Overloading Craft, operation of craft in adverse weather conditions beyond the crew's experience.
	<p>There needs to be a corollary to this that allows for home-builds or custom builds. Certainly they can be required to meet certain standards and an initial survey by a competent surveyor is appropriate but we should not introduce rules that inhibit the DIY side of things.</p> <p>I understand that recent experience with home-built craft has caused some difficulty but I believe this can be dealt with by the requirement for the vessel to be insured and for a survey to be carried out if requested.</p>



Inland Waterways Association of Ireland (IWAI)

Survey results and Members Written Feedback in relation to the draft Shannon Byelaws

Byelaw	Comment
Regulation 41(2)(a)	Does this apply to post 2023 engines only? Current vessels could well have engines whose type is known but where the makers plate has been lost. Many vessels will have engines built by companies who are long gone. Kelvin, Gardner etc. Re-engining of vessels with vintage engines or re-conditioned engines is a long-standing practice.
Regulation 41(2)(c)	There needs to be a provision here that the driver must WEAR the kill cord. Should also apply to lots of other vessels as well like some RIBs, jet-skis etc whether inboard or outboard.
Other	Toilets and shower blocks need to be kept in better condition. More bins are required at boat moorings
	A disabled boater permit should be introduced
	There should be speed restrictions on the river, these should be clearly stated on the Green and Red markers and should be policed. An incentive scheme needs to be introduced to bring young families on to the river otherwise it will seem to be an elite activity reserved only for the few.
	I'm happy to pay but where are the waste collection facilities.
	All shaft drive boats leak what about pumping out of this bilge water?
	WI should increase their service levels, to include ESB in all harbours
	I would welcome more facilities at public marina, water, electricity etc.
	Why do we have to ring lock in Roosky with 353 in front of number?, why was lock times changed from 9 to 9-30 in morning, why are locks and lifting bridges not fully manned at high season and at high water
	Conditions on Shannon Erne Canal are posing safety risks e.g overgrown/fallen trees. Use of Utility blocks should be restricted to boat users, particularly as Campervan/ Caravan users and others are availing of their use which is resulting in a lack of hygiene and deterioration in their service and conditions.
	Need to look at more moorings for those who wish to liveaboard vessels, not necessarily barges. When i retire I hope to liveaboard a suitable boat
	Currently there appears to be little or no maintenance carried out by WI on the Shannon/Erne waterway including overgrown/fallen trees and service blocks are a complete and utter disgrace (no toilet rolls/no soap/ temperature control of showers being either too hot or freezing especially at Carrick on Shannon/ Lough Key



Inland Waterways Association of Ireland (IWA)

Survey results and Members Written Feedback in relation to the draft Shannon Byelaws

Byelaw	Comment
	and Ballinamore. Also is there a parking /use of facilities fee for Campervans which currently are crowding harbours?
	If it helps to remove the "harbour hoppers" and the derelict boats from the system it will be worth it
	Add in a) Annual survey of life jackets (b) Permits and fines to have visual stickers (c) No access to jetty or locks for noncompliant boats (d) 5 year survey only to prove compliance with Byelaws. This will reduce costs.
	Maintenance of the Shannon Erne canal is very poor leaving sections dangerous. What is WI plan to deal with Ash Dieback?
	There needs to be more "out of Town" moorings on the Shannon as is the practice in Lough Erne
	Facilities at various locations quite poor. Lack of space in many marinas and harbours
	WI should install green/red traffic lights at all Shannon locks especially Athlone. WI website should have available current data such as Bridge Air draft, Flooded moorings, to help boaters plan safer journeys
	Waterways Ireland need to also stop the swimmers taking over the decks. It is dangerous around the boats.
	Railway bridge makes passage to Dublin virtually impossible
	Speed limits in and around harbours should be enforced
	Liveaboards should have full services in specific harbours, electricity should be through a specific post and not paid by waterway cards, probably advance or credit card only, stopping fraudulent use.
	Utilities should be available all year round in all locations especially if a fee is being introduced.
	Enable Gardai to enforce byelaws re swimming in harbours, climbing on boats , jet ski , nuisances etc
	There are several maximum speeds quoted in each set of the bylaws, without any thought, or of the method to be used to measure these speeds.
	It would be helpful if the bye-laws encouraged two practices to optimise the use of space in harbours: (a) mooring economically. Asking masters to moor so as to allow the maximum use of space by other vessels. Eg don't moor a 30 ft boat right in the middle of a 60 ft gap. Moor to one end so another vessel can fit in as well. (b) explicitly permit mooring alongside other vessels within reason. Make it clear that it is not acceptable to refuse permission for one vessel to moor alongside another unless the



Inland Waterways Association of Ireland (IWAI)

Survey results and Members Written Feedback in relation to the draft Shannon Byelaws

Byelaw	Comment
	size/weight/structure/location of one or other of the vessels makes it inadvisable
	Are open fishing boats and tenders <20ft required to register?
	Are we going to be issued with a multi use card for the year for accessing the facilities?
	One small observation about the Limerick City harbour. We have travelled to Limerick on a couple of occasions. There can be a shortage of moorings. This is due to the large number of small boats. Would it be possible to designate a section of the harbour to them exclusively? (Similar to that in Shannonbridge.) Thereby freeing up a few spaces for the larger boats. I must admit that my concern for the lack of spaces puts me off travelling to Limerick.
Schedule 1	Heritage boats should have a nominal fee similar to vintage cars.
Fees	As an Erne boater I would suggest no fee for any boat until reaching Keshcarrigan (where the navigation markers change) and a monthly fee of 10% of annual fee for boats continuing to the Shannon. If the annual fee is applied at the border as envisaged then the SEW might as well close. I do think a registration fee is reasonable as a contribution to the cost of the facilities provided. Fisherman should also pay
	Set the fees at a more reasonable amount ,ie €70.00 per vessel, allow for Ribs ,speedboats etc that are registered along with cruisers or barges .Remember that the people who holiday on the river spend a lot of money locally and this is to be encouraged not penalised.
	I feel the €200 annual charge needs to be refined and tailored to the size and power of each boat, eg a small 4 berth cruiser with a 30hp engine as compared to a 8 berth 400hp one
	It is not uncommon for waterway enthusiasts to own more than one boat. A major concern for these individuals is the proposed 30HP cut-off limit for boat engines. For those participating in both offshore and inland waterway activities, it's typical to own a Rigid Inflatable Boat (RIB) or Tender with an engine exceeding this proposed limit. The bye-laws should accommodate registered and insured vessels under the same ownership or skipper. Many boat owners have invested significant time and effort to be able to afford their vessels. It is essential, then, that these factors are considered when crafting bye-laws, ensuring fairness and practicality in their implementation.
	Funds raised from licensing fees must be used to facilitate and maintain services across the navigation and must directly benefit



Inland Waterways Association of Ireland (IWAI)

Survey results and Members Written Feedback in relation to the draft Shannon Byelaws

Byelaw	Comment
	the community contributing these fees and enhance the waterways experience. Consideration should be given to postponing the implementation of licence fee payments until outstanding issues regarding service provision, or rather its current lack, are suitably addressed.
	The proposed annual registration fee should be €50 plus lock fees per annum
	Some fees should apply for the good of all boaters but should then be ring fenced to improve facilities for boating community, not for greenways etc
	No issue with registration fee but disagree with it applying to multiple vessels of a single owner. Insurance will be required as part of the annual fee and I also believe from that annual inspections will also become compulsory. This will become a costly annual exercise.
	Once an annual fee is established, regardless of size or type of vessel, it is just a tax that will rise and rise rapidly
	Annual registration fee - need to understand what the monies will be used for - the majority of toilet /shower blocks are serviced by council, WI key cards are used to access something times filthy facilities. How will electricity pillars be improved? What exact upgrades./improvements are being considered by this fee?
	Whatever amount is levied Should not be subject to inflation
	I'm happy that user pays. But we are just the boaters. Will users of motor homes have to pay also. They are now clogging up places like Castle Harbour on Derg.
	€200 fee is fair & reasonable. Fine the harbour Hoggars.
	With the price of fuel, these charges are only going to make the waterways too expensive for the ordinary boat person
	There should be some flexibility for smaller boats that are not exempt from the annual registration fee but are trailered boats that are only on the water for limited period. Example could be monthly/quarterly permit
	All vessels, including hire boats, using the waterways should pay a fee, possibly something similar to road tax. This income should then be only used to pay for maintenance and enhancement of the waterways. As with the canals the fee should cover the operation of locks and bridges
	Registration Fee should be ringfenced and WI should have a customer charter with performance criteria they must report against. These should include -improvement of facilities;



Inland Waterways Association of Ireland (IWAI)

Survey results and Members Written Feedback in relation to the draft Shannon Byelaws

Byelaw	Comment
	maintenance of navigation; and availability of vacant moorings to the boating community
	We have a smaller boat rarely used and would like paying scheme for this.
	As a boat owner i am in total agreement to a fee being paid for the use of our waterways
	Heritage boats should have a nominal fee similar to vintage cars.
	If a registration fee is introduced then it should apply to all boats including fishing boats, either that or all boats less than 7 metres should be exempt.
	I have no problem with an annual fee. My concern is that future fee increases may exclude ordinary boat users. That boating then may become elitist , the preserve of the rich.
	Boating is very expensive for people who pay private mooring fees, have proper insurance , surveys , holding tanks. Adding to an already expensive pastime will mean less people abiding by the rules
	€200 fee should be scaled to size and HP of boat. Size because of quay space and HP for environmental reasons. Sailing craft should have a low registration fee as they are environmentally friendly.
	A charge of €100 p/a would be okay.
	Registration fee should be fixed at the set fee for at least 10 years
	I agree with the annual fee as long as it remains at €200.
	€200 is an exorbitant fee and would drive ordinary users off the river. A cost relevant to the size of boat would be more appropriate. If necessary have a directed charge rather than a one price for all regardless.
	There should be reduced annual fees for old age pensioners and people with disabilities.
	A tender even if the engine is greater than 15HP should not be subject to an additional registration fee; only one vessel can be used at a time
	I have no major Issue with the Annual Fixed cost of €200 if, my owning a second or third vessel, is not charged as I can only use one boat at a time.
	I don't mind paying increased fees provided WI continues to invest in additional mooring at marinas.
	WI are not doing sufficient on water facilities. The charges are not necessary and are penalising persons with modest incomes that use the lake and monies collected will provide no extra supports to boat owners



Inland Waterways Association of Ireland (IWAI)

Survey results and Members Written Feedback in relation to the draft Shannon Byelaws

Byelaw	Comment
	How will day boats/power boats be handled when they launch on lakes only at weekends and are currently not registered with WI anyway. I don't want to pay 200 if they get away for free
	Our waterways are a resource we can be proud of, but it must be paid for
	All we're paying this extra monies is to top up pensions for the top boys. Genuinely have no issue with €200 per year if it's been spent on upgrading public jetties and keeping the navigation system safe
	Spend some money on speed in the inner lakes before someone gets seriously hurt. Waterways Ireland to give the IWAI more say in how our money is going to be spent
	Considering the way WI already operates I don't see how a lot of the new regulations will work. I understand an annual fee but €200 is too expensive. This will lead to more boats being unregistered and abandoned.
	Don't agree with the annual registration. Pay be using locks, ie if you use it you pay for it. Collect money like toll roads from boat reg number, should be all Ireland charge if applied, additional cost onto my holiday time, where will it stop. With bad weather and fewer boats on the river it would be better in encourage people to use the river and spend money locally, not discourage them with more costs and rules.
	I am ok with the 200 euro registration fee in principle but not for ownership of a second boat as only one boat can used at any one time by a member. Would like to know what members get in return for such fees?
	I have no issue with the €200 IF there is adequate facilities. I speak for Lough Erne system in particular. There is NO power hook ups at 98% of jetties even though 50% have some form of power close by to add the facility and also there is a major lack of pump outs never mind they don't work, Belturbet not working, Carrybridge "wasnt" working. Etc etc. if there is proper faculties in place at even 30 to 40% of jetties then and only then should the fee be introduced.
	We need something that allows people to pay once but it covers multiple boats. I have a cruiser, sailing keelboat and a rib. I should not have to pay €600.
	Totally agree with 3day rule and feel €200 is a reasonable license fee
	I think 200 euro is reasonable but we should ask about how potential increases will be calculated



Inland Waterways Association of Ireland (IWAI)

Survey results and Members Written Feedback in relation to the draft Shannon Byelaws

Byelaw	Comment
	it's hard to argue against the principle of annual registration but I think WI need to sell the upside so that people see the money going back into the boating side of things and not being used for greenways or whatever. There is quite a level of mistrust that the fees raised by WI through the Annual Registration Charge for the Shannon will actually be used for the betterment of the navigation itself. Folks have seen WI spend a lot of time and money on boardwalks and other non-navigation amenities (welcome as they are to the general public) and fear that funds raised from Annual Registration fees will be diverted elsewhere
	I think it would be fairer if this were to be done on a 12 month basis. It seems unfair for a user registering a vessel for the first time later in the year to be hit for a full year's charges the way the current canal permit system does. A system similar to car tax would be fairer. Modern technology can be used to ensure the admin burden is not excessive.
	I have no issue with the 200euro IF there is adequate facilities. I speak for Lough Erne system in particular. There is NO power hook ups at 98% of jetties even though 50% have some form of power close by to add the facility and also there is a major lack of pump outs never mind they don't work, Belturbet not working, Carrybridge "wasn't" working. Etc if there is proper faculties in place at even 30 to 40% of jetties then and only then should the fee be introduced
	The annual registration fee of €200 seems to me to be fully justified especially when it is tied to all boats must have insurance cover. Therefore, they must have a boat survey every few years. Anecdotal tales of boats breaking down and on-board fires implies to me that some boat owners are lax in their boat maintenance and servicing. Hopefully this will mean a reduction in emergency call outs etc.
	Speaking to other boat owners, they are concerned that the annual fee will as it were 'be the thin end of the wedge'. That it opens the way to massive fee hikes in the coming years. There is a concern that boating might therefore become an elitist pastime, only for the very wealthy. I hope that Waterways Ireland can allay these fears
Schedule 2 Fixed Penalty Notices	
	Fixed penalty fines must have an appeal process outside court
	It's crucial that an appeals process is put in place



Inland Waterways Association of Ireland (IWAI)

Survey results and Members Written Feedback in relation to the draft Shannon Byelaws

Byelaw	Comment
	<p>Appeals against €150 fixed penalty notices penalties can only be made through the District Court. There may be circumstances where a stay at a WI jetty has to be extended due to safety considerations such as inclement weather, mechanical failures, or even the unavailability of the boat owner due to illness or other legitimate circumstances.</p> <p>Harbours and jetties are designed to be safe havens for boaters, and a rigid penalty system could inadvertently encourage individuals to dismiss safety protocols. This issue is compounded by the proposed reduction of the permissible mooring duration from five to three days in certain navigation areas. A more balanced approach could accommodate the occasional necessity of longer stays due to unforeseen circumstances</p>
	An independent appeals mechanism is essential to allay waterways users fears of unaffordable court costs
	My opposition to the fixed penalty notice is only in relation to the lack of an independent appeals process.
	<p>The proposed system of fixed payment notice is a draconian measure and should be replaced with a notice of noncompliance in the first instance by Email and hard copy and then by this measure if not rectified. Otherwise waterways Ireland will issue them for even minor items to generate revenue. After all this is our recreation not the road traffic act even merchant shipping get notice of noncompliance for breeches before fines</p>
	On the spot fines would introduce an element of fear and resentment towards river supervisors. This is contrary to the aims of Waterways Ireland.
	The fixed penalties are too high
	<p>I think there needs to be a system in place to apply for exemption of 3/5 day rule when you have any mechanical or safety issue. This year I have received a number of these in Carrick On Shannon area and we have our berth in Cootehall. We were unable to get to our berth due to an electrical issue and was a week or so until we could get it resolved. Maybe some flexibility to those who are paying full 12-month berth fees.</p>
	No appeal process for the fixed payments fines.
	There needs to be written criteria/procedures for the issue of these fixed payments fines
	<p>The current drafts propose that the only appeals process to a fixed penalty notice is to the District Court. I realise that this was in the original bye-laws but it seems rather out of line with current thinking and out of step with the practice in many other agencies</p>



Inland Waterways Association of Ireland (IWAI)

Survey results and Members Written Feedback in relation to the draft Shannon Byelaws

Byelaw	Comment
	(e.g. local authorities) in relation to fixed penalty notices. There are many precedents for organisations to create an “appeals panel” of independent adjudicators to decide on similar cases