



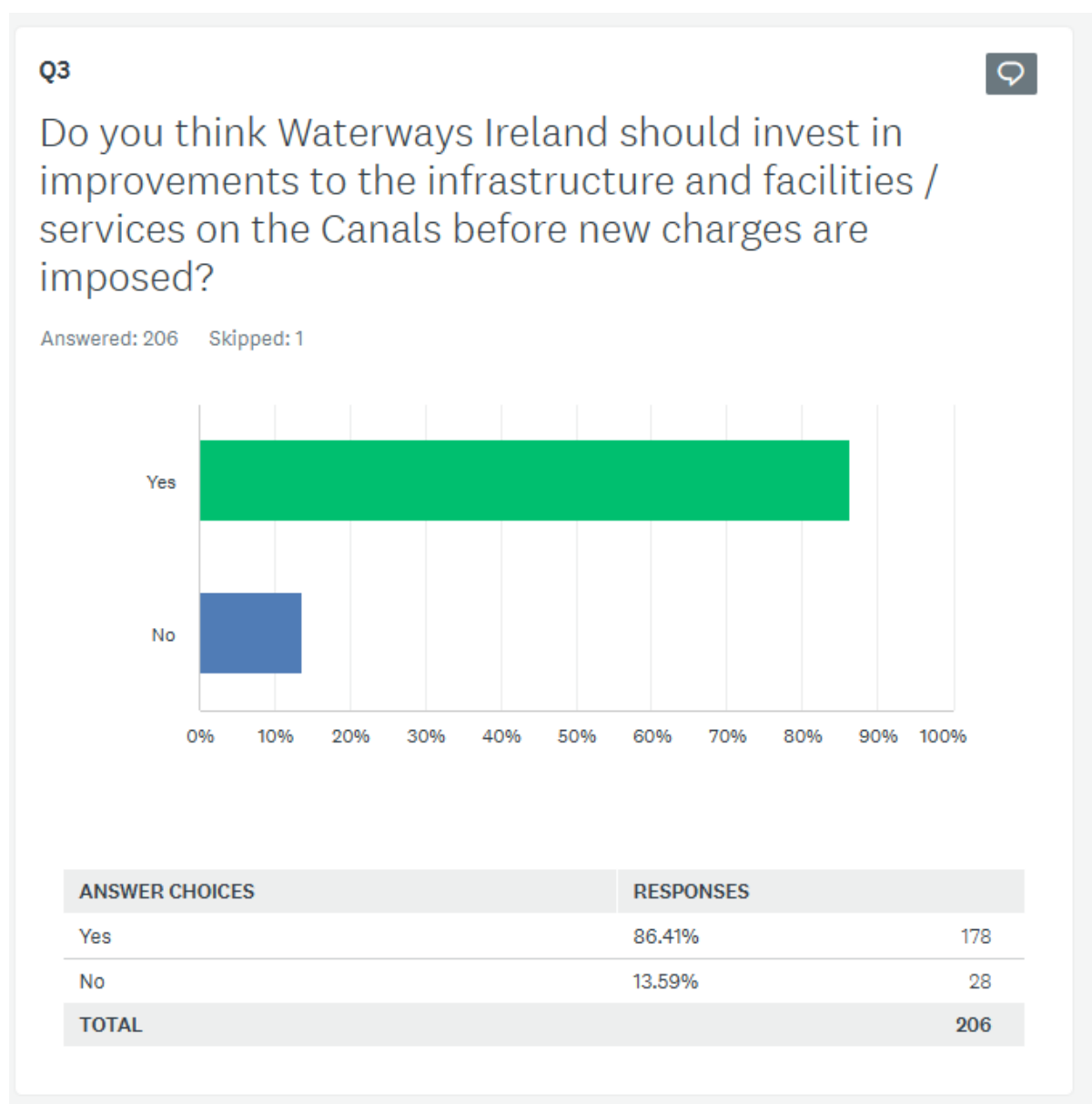
Inland Waterways Association of Ireland (IWAI)

Members survey and Written Feedback on the Canal Byelaws

Survey Result

Q1 - Members Name – Available but withheld.

Q2 – IWAI Membership Number - Available but withheld.





Inland Waterways Association of Ireland (IWAI)

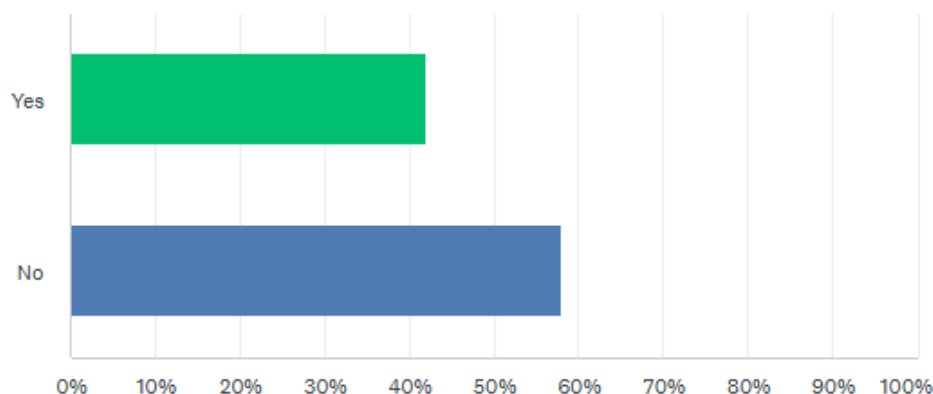
Members survey and Written Feedback on the Canal Byelaws

Q4



Do you believe the proposed range of permits meet user requirements?

Answered: 202 Skipped: 5



ANSWER CHOICES	RESPONSES	
Yes	42.08%	85
No	57.92%	117
TOTAL		202



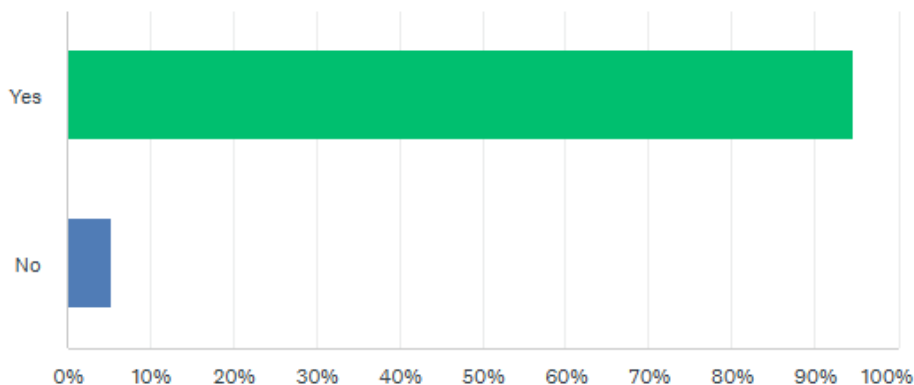
Inland Waterways Association of Ireland (IWAI) Members survey and Written Feedback on the Canal Byelaws

Q5



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

Answered: 203 Skipped: 4



ANSWER CHOICES	RESPONSES	
Yes	94.58%	192
No	5.42%	11
TOTAL		203



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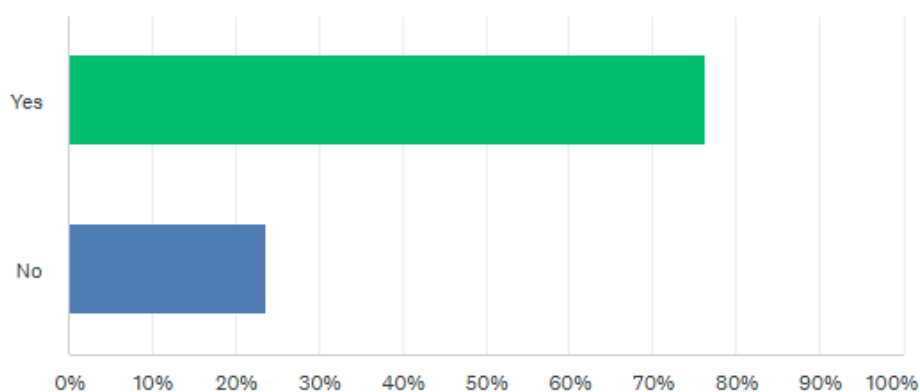
Members survey and Written Feedback on the Canal Byelaws

Q6



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

Answered: 203 Skipped: 4



ANSWER CHOICES	RESPONSES	
Yes	76.35%	155
No	23.65%	48
TOTAL		203



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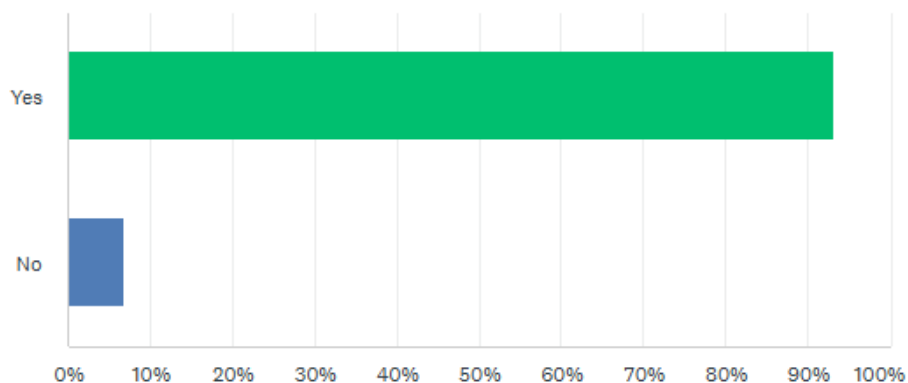
Members survey and Written Feedback on the Canal Byelaws

Q7



Do you think Waterways Ireland should establish an independent mechanism to process appeals?

Answered: 206 Skipped: 1



ANSWER CHOICES	RESPONSES	
Yes	93.20%	192
No	6.80%	14
TOTAL		206



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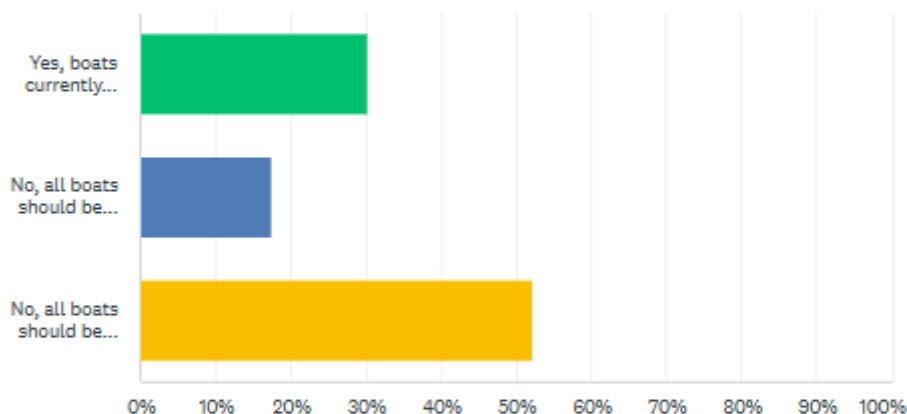
Members survey and Written Feedback on the Canal Byelaws

Q8



Regulation 4(2)(h) 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: 205 Skipped: 2



ANSWER CHOICES	RESPONSES	
Yes, boats currently without holding tanks fitted should be exempt	30.24%	62
No, all boats should be required to fit holding tanks or other equivalent system that prevents toilet waste entering the waterways	17.56%	36
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	52.20%	107
TOTAL	205	



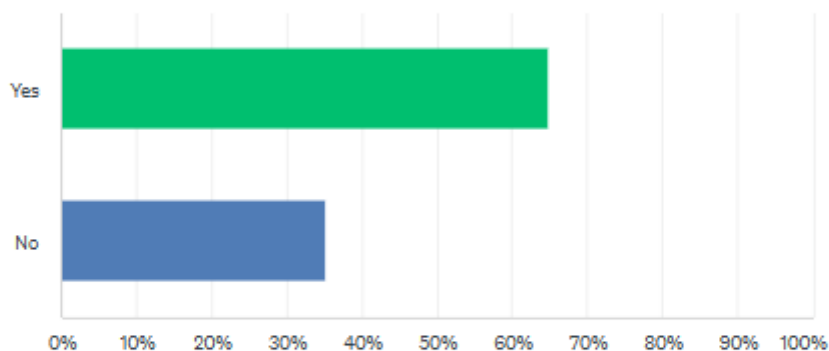
Inland Waterways Association of Ireland (IWAI) Members survey and Written Feedback on the Canal Byelaws

Q9



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

Answered: 199 Skipped: 8



ANSWER CHOICES	RESPONSES	
Yes	64.82%	129
No	35.18%	70
TOTAL		199



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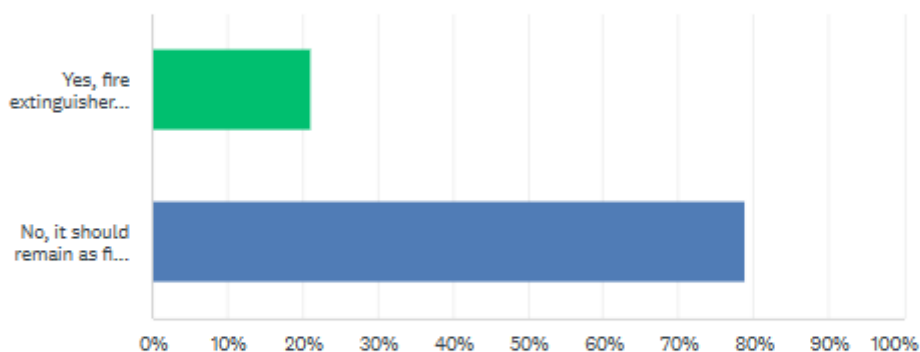
Members survey and Written Feedback on the Canal Byelaws

Q10



Regulation 8(3) 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: 204 Skipped: 3



ANSWER CHOICES	RESPONSES	
Yes, fire extinguisher should be professionally serviced every year	21.08%	43
No, it should remain as fire extinguishers must be in working order	78.92%	161
TOTAL		204



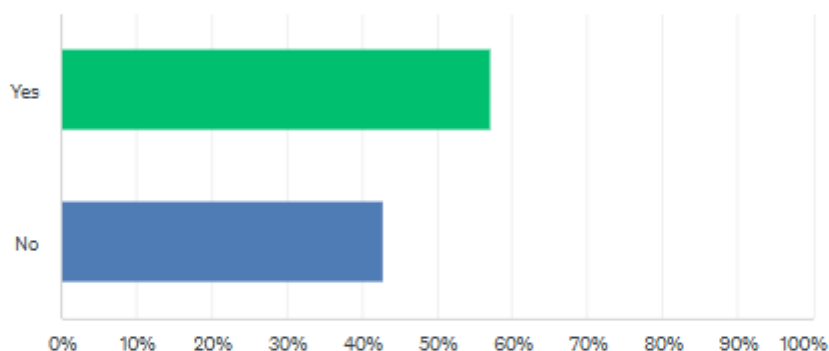
Inland Waterways Association of Ireland (IWAI) Members survey and Written Feedback on the Canal Byelaws

Q11



Regulation 22(d) introduces the 5 day rule in Shannon Harbour and Richmond Harbour between 01st April and 01st November each year. Do you agree with this?

Answered: 203 Skipped: 4



ANSWER CHOICES	RESPONSES	
Yes	57.14%	116
No	42.86%	87
TOTAL		203



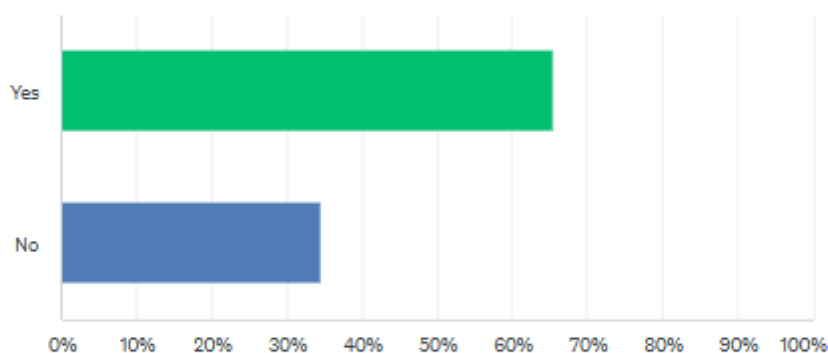
Inland Waterways Association of Ireland (IWAI) Members survey and Written Feedback on the Canal Byelaws

Q12



Regulation 22(e) limits vessels without a houseboat permit from mooring in Grand Canal dock and Spencer Dock for more than 20 consecutive days. Do you agree with this ?

Answered: 205 Skipped: 2



ANSWER CHOICES	RESPONSES	
Yes	65.37%	134
No	34.63%	71
TOTAL		205



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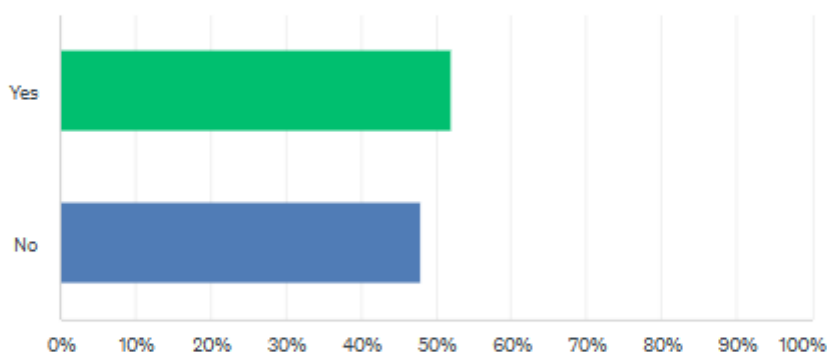
Members survey and Written Feedback on the Canal Byelaws

Q13



Regulation 35(10)(q) 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: 204 Skipped: 3



ANSWER CHOICES	RESPONSES	
Yes	51.96%	106
No	48.04%	98
TOTAL		204



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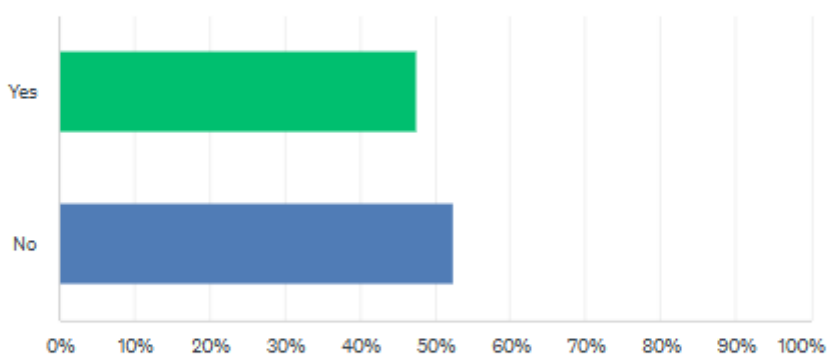
Members survey and Written Feedback on the Canal Byelaws

Q14



Regulation 38(2)© prohibits all vessels from mooring along the Dublin Metropolitan canals from the 12th locks in to Grand Canal Dock and Spencer Dock respectively without permission from WI. Do you agree with this?

Answered: 204 Skipped: 3



ANSWER CHOICES	RESPONSES	
Yes	47.55%	97
No	52.45%	107
TOTAL		204



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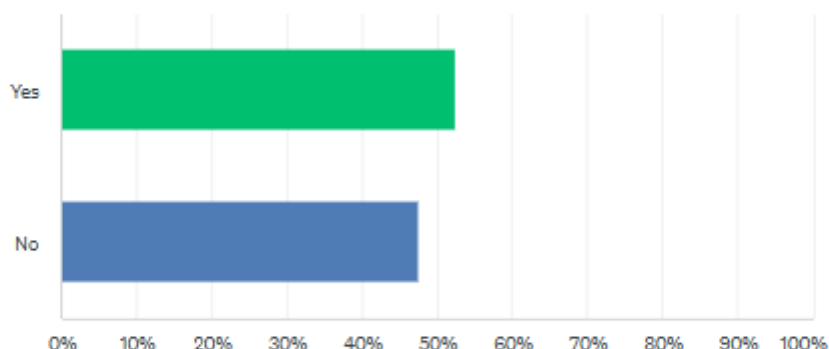
Members survey and Written Feedback on the Canal Byelaws

Q15



Regulation 38 (2) (d) limits vessels without a houseboat permit from mooring between the 16th and 12th locks on the Grand and Royal Canals and within 1km of Belle Harbour for more than 10 days per month. Do you agree with this?

Answered: 204 Skipped: 3



ANSWER CHOICES	RESPONSES	
Yes	52.45%	107
No	47.55%	97
TOTAL		204



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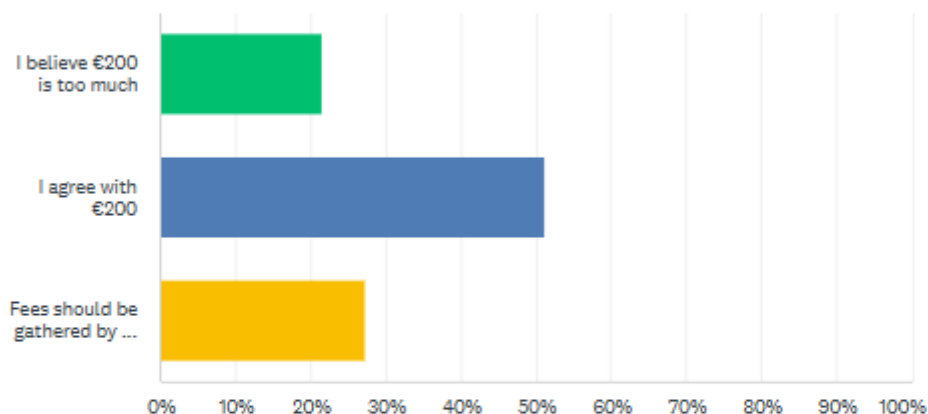
Members survey and Written Feedback on the Canal Byelaws

Q16



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

Answered: 205 Skipped: 2



ANSWER CHOICES	RESPONSES	
I believe €200 is too much	21.46%	44
I agree with €200	51.22%	105
Fees should be gathered by way of CMP as before	27.32%	56
TOTAL		205



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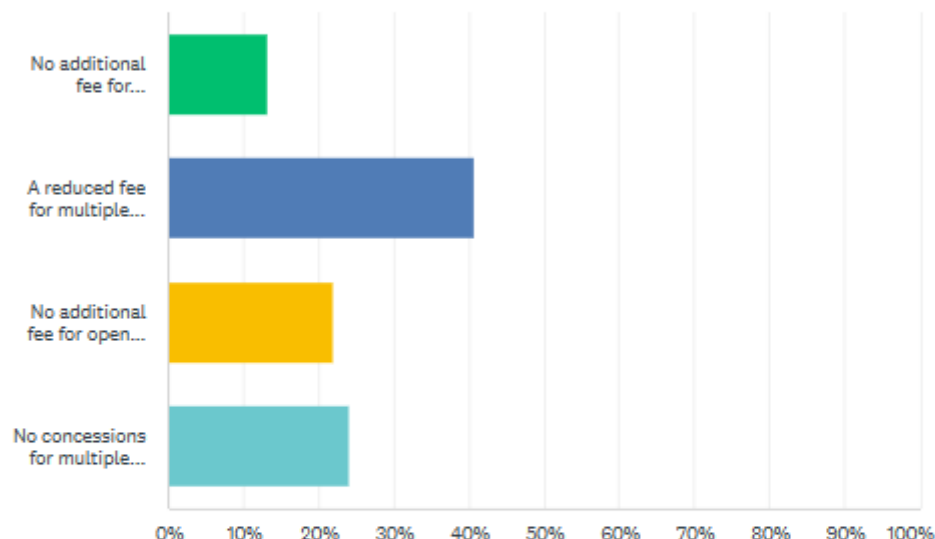
Members survey and Written Feedback on the Canal Byelaws

Q17



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

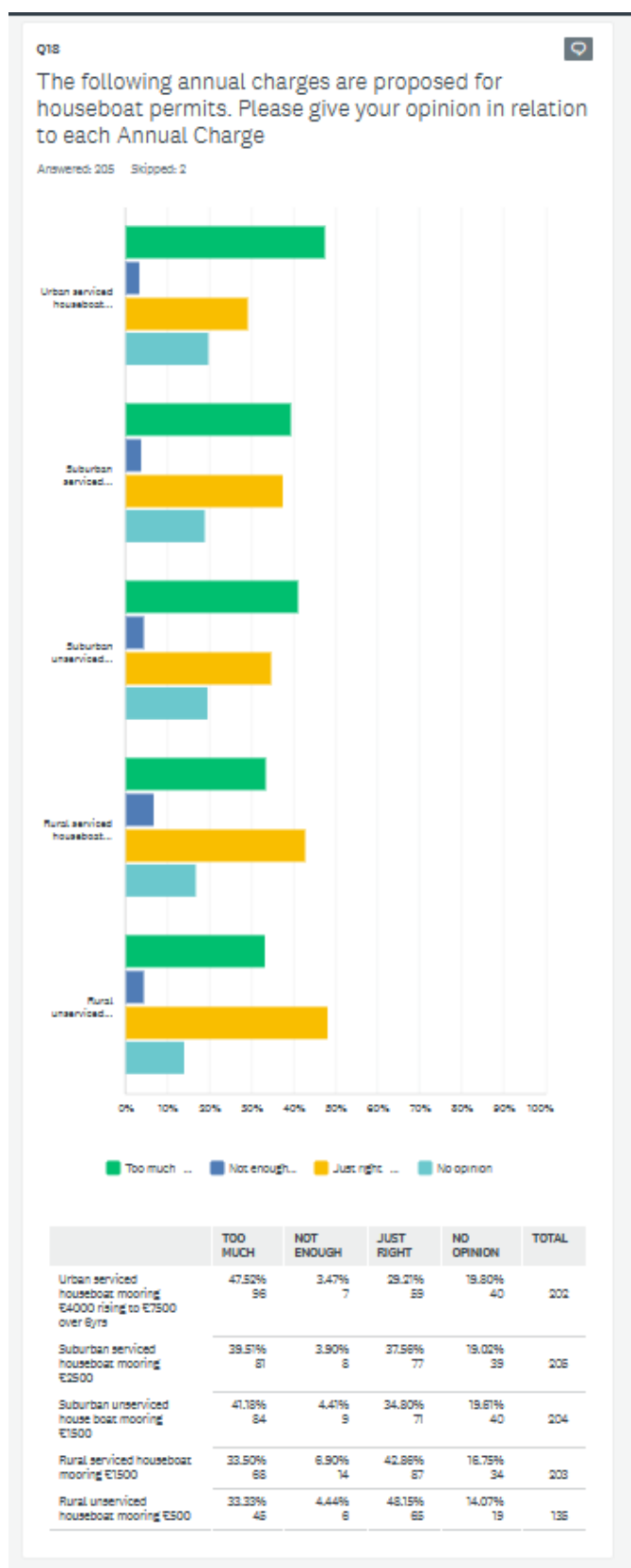
Answered: 204 Skipped: 3





Inland Waterways Association of Ireland (IWAI)

Members survey and Written Feedback on the Canal Byelaws



President: Kay Baxter **Executive:** John Fitzgerald **Vice-President:** Alan Kelly
Honorary Secretary: Graham Bartlett **Honorary Treasurer:** Alison Maddock **Membership Sec:** Bríd Joly
Directors: Denis Baker, Colin Becker, Kevin Clabby, Peter Maxwell, Chris McCarney, Matthew Daniels, Darragh Dolan

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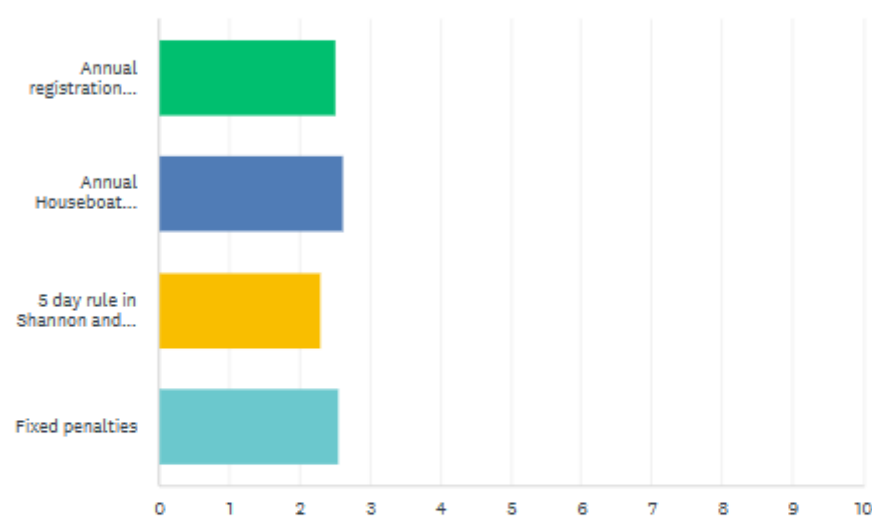
Members survey and Written Feedback on the Canal Byelaws

Q19



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

Answered: 193 Skipped: 14



	1	2	3	4	TOTAL	SCORE
Annual registration fee	29.02% 56	21.76% 42	20.73% 40	28.50% 55	193	2.51
Annual Houseboat permit charge	28.50% 55	27.46% 53	22.80% 44	21.24% 41	193	2.63
5 day rule in Shannon and Richmond Harbour	13.98% 27	26.42% 51	34.72% 67	24.87% 48	193	2.30
Fixed penalties	28.50% 55	24.35% 47	21.76% 42	25.39% 49	193	2.56



Inland Waterways Association of Ireland (IWAI)

Members survey and Written Feedback on the Canal 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	The changes are reasonable and long overdue
	I am not opposed to any of the changes
	I support all the proposed measures. As someone that travels down into the Shannon from the Erne it is frustrating not to be able to berth in Richmond Harbour because it is full of unoccupied boats.
	The Government needs to increase funding for REGULAR maintenance on the Grand, Royal and Barrow. Currently only navigable from Oct through March/April or when following a weed cutter.
	W.I. should work more with the people in IWAI & other organisations who devote a lot of time and energy and money working to keep the system used in a positive manner
	When one compares the moorings on offer from the Scottish Canals and the Canals and River Trust with the basic service on offer from WI is abysmal for the proposed fees
	WI need to start the process again, beginning with proper consultation of ALL waterways users.
	Too many references to permission being required from WI. This needs to be rethought by including a rider such as 'where such permission will not be unreasonably refused/ withheld.
	Spread the fees across all boat users... use winter mooring fees as well by charging more for winter moorings. Folk choosing to live on water are doing so as it's impossible to buy. Don't make it cost prohibitive but share some of ownership for mooring upkeep but be conscious that they sacrifice space to live this way. But they should however not be polluting the waterway and vessels should be kept up to muster safety and environmentally wise. This costs money too. Do more to provide services...good ones that are kept clean and functional include washing service facilities washers dryers etc.
	My boat is my private property, WI should not be able to dictate who I have to stay/live on it or whether I can let/sub-let it or what condition the interior should be in. Requiring permission to moor in Dublin is designed to prevent people from moving their boats in the manner that the canal is designed for. The requirement of a three-person crew would mean that no couple or single boater would be able to move their boat without another person. Also, it



Inland Waterways Association of Ireland (IWAI)

Members survey and Written Feedback on the Canal Byelaws

Byelaw	Comment
	would prevent tourist couples from hiring boats. Barges have been manned by individuals and couples since canals began and are still so throughout Europe and the UK. The only difference in modern times is that we have engines instead of horses. The waterways, locks, speed etc are the same. This is another attempt to stop boaters from moving their boats. The excessive increase in fees and threats of fines, without appeal, for some very subjective misdemeanours, is yet another attempt to prevent people from living on the canal. Towpaths are being referred to as greenways and horses would be required to request permission to use the very paths that were designed for them. This is an attempt to remove the history of the canals. It's clear that WI no longer want the canals used in the way that they're intended for.
	The waterways are underused
	My family are willing to accept that new byelaws are required to take into account environmental, societal and navigational / operational changes but Waterways Ireland seem to want to have their cake and eat it too with these proposed amendments. There is no guarantee at all that Waterways Ireland will provide more (or better) services and investment in the navigational infrastructure with this proposed fee structure
	I strongly oppose to the annual fee of €200 euros now. I propose half price charges for OAP. The 5 day rule should be extended to 7 days to facilitate boat owners who are working 5 day week. People who are profiteering from activities on the waterways, boat hire, canoe hire, coffee shop and other activities should contribute a fee to WI.
	Bylaws are just a revenue stream. Its time boaters were treated as customers and not victims. We are tourists who spend our Holliday's (and a lot of money) in this country and not abroad. It's time WI recognise this.
	I would like to see more incentives to bring young people/young couples on to the canal system. Also I see nothing in the proposals to encourage the use of dormant boats/barges that are clogging up the harbours (the easy pickings are the ones who frequent Richmond and Shannon Harbour regularly over the year). All I see are cruisers getting bigger and bigger each year and I cannot see most of them being bothered to stop at the canals. In my opinion the way forward for the canals is to encourage smaller to medium sized cruisers and provide onshore facilities strategically along the banks that can be used by multiple users of the canals/banks. A"



Inland Waterways Association of Ireland (IWAI)

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Byelaw	Comment
	one sized fits all" solution for the river and the canals will not succeed.
	I accept that it is time for new charges on the canal as fees have not moved in many years, but the level of charges is out of line. I don't understand why "responsible for Navigation" has been dropped from their new Byelaws
	We own a narrow boat that has 2 berths and is 44 feet long. Some boats are much bigger. Fees should be based on berths. We currently have a residential permit. The increase to the fee is over 700%. And will rise to €7500. No security of tenure no ownership rights. If we were to stay for 20 years that would be €150000 for access to water, electricity and waste disposal. We could buy a house for that. WI was borne from the Good Friday Agreement and its mission should not be to maximise revenue as per KPMG report. And as per KPMG it is a money grab. Comparisons with the canal system in the UK is comparing Apples to Oranges. Their system is far superior and is constantly accessible whereas that is not the case here. Proposed fees should be reduced, negotiated and the vessel size should be a factor
	We need to encourage more people to use our inland water ways, our national heritage. WI have created themselves a lot of bad press by their draconian behaviour.
	NO problem paying more if Waterways improve the services for boaters - at the moment services e.g., water / wastewater are abysmal
	Boating should be encouraged not fined for use
	We need in writing the plan for revenue increases and a full understanding of how €200 was chosen as the registration fee and what are the plans for the boater for the revenue collected (not the walkers or cyclists)? Is the money ring fenced monies for navigation. Byelaws need to be applied for the Island as a whole not piecemeal
	These byelaws are giving WI more power to police the waterways without any commitment to improve or supply services. The waterways are owned by the people and WI serve the people.
	I think they should clean up and improve the canals before any changes are made at this moment in time you can't sail in comfort, as we should be able to do. Think we all agree that the environment is most important so emptying toilets into the river or canal can't happen. But the canals were built to be a means of transport and so much of it is overgrown or full of weed making it impassable. I'm in



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Members survey and Written Feedback on the Canal Byelaws

Byelaw	Comment
	Graignamanagh and apart from a cold water tap we have no services, most of the time you can't even find room to moor up. So much could be done to improve these wonderful amenities for all users
	The canals need millions in investment to bring up to EU standards
	I'm 79, I've always had a permit and I keep my boat in good condition. I find these proposals very coercive and overbearing. They need to think again- provide a service first.
	All boats of all sizes should be registered. All craft should display a number even if registration is free to certain classes of boats eg jet skis, fishermen etc so offending boats that contravene the Byelaws can be identified
	Try to keep the regulations clear and simple and do not discriminate against owners who are, perhaps, less well off.
	Regulations on usage of canals / locks must facilitate traditional and heritage boats. This may require derogations on vessel dimensions, and requirements for equipment, fittings, and markings
	The increase in paperwork makes it less attractive to go to events held in Shannon Harbour. Visits to dry dock there are also fraught with paperwork. The idea of travelling farther by canal is becoming very unattractive.
	Draconian byelaw changes. Canal usage is at an all-time low. Nothing in the byelaws that is going to encourage the use of our waterways.
	Other users walkers, fishermen, canoeists, cyclist, campers etc. don't pay. Other users should be encouraged to use canals and pay to support local businesses and increase local tourism and keep villages alive. Canals should be better maintained and made navigable all year round. Canals should be handed over to competent authorities for maintenance or a canal trust. WI should be promoting and increasing the use of waterways not discouraging boat use. It is a pleasure to see barges/ cruisers using the canal but unfortunately it is a rare sight. The happiness and joy it brings to people always a happy smile and a wave this needs to be encouraged by more use of the waterways
	Existing rules are not policed why look for extra powers. Boaters funding canals - what about walkers, cyclists & fishermen. Boaters are the least users but the only payers. Facilities in place before extra laws. Until canals are navigable fees should be scrapped. Canal maintenance should be handed to competent authority like NRA or County Council for greenways. Laws should be simple and



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Byelaw	Comment
	straight forward ¬ include things covered under existing I.e. gas, electricity, pollution, fire and lifejackets etc.
	I do not agree with the proposed by laws, they restrict navigation and are asking too much in the way of fees without the services
	Existing services must be made and maintained in a functional condition
	Extending mooring times should be controlled, to ensure that visiting boaters can avail of the facilities. There are far too many boaters looking for cheap annual costs, while the rest of us pay our private mooring fees, then when actually looking for an overnight mooring, they are all filled with empty boats.
	The canals are not fit for purpose it's no enjoyment bringing a barge down the systems. You will destroy your paintwork and Windows and they want to charge for this
	If all the proposed by laws are introduced boat ownership will drop and IWAI membership likewise, small towns and villages going to bear the brunt, their summer revenue stream gone.
	Waterways Ireland seem to be more interested in walkers and cutting back the bank rather than the navigation. They don't seem to want boaters to be on the water, unless they're in canoes
	WI should be responsible and made accountable for damage done to boats due to lack of canal maintenance-e.g., from low water levels and overgrown weeds. We feel strongly that we cannot accept the new regulations and penalties when WI refuse to maintain the waterways or provide services such as pump outs. We don't trust senior management in WI to uphold their promises, and we have not had pleasant or reassuring dealings with WI inspectors.
	WI are not competent enough to run the canal or Barrow line. If these navigations were run competently, the canals and all the small towns along it would flourish.
	This set of changes needs to be stopped and the practice of telling us this is coming like it or not needs to stop. These changes leave an opening for future hikes in fees that will make boating cost prohibitive. The potential incoming government will not look kindly on boaters they will be seen as a privileged group. The purpose of waterways Ireland was to be a custodian of the waterway for its owner the people of Ireland. This set of laws moves them to being a corporate property owner whose mission is to peddle misery to its users.
	The rules currently don't enable me to travel the canals or whole navigation from my base in Lough Derg



Inland Waterways Association of Ireland (IWAI)

Members survey and Written Feedback on the Canal Byelaws

Byelaw	Comment
	The proposed new byelaws run contrary to the Government's Climate Action Plan. The concentrations of boats moored on the canals are in locations serviced by frequent and affordable public transport. In the new plan, it will be 3 times more expensive to have a boat in these places than in rural areas. This will incentivise boat owners to move to areas that can only be accessed by car. Under the Climate Action Plan, Government policy is to drive down the total amount of driving done across society, with a target for 2030 of a 20 percent reduction in total vehicle kilometres, car kilometres and “commuting” car kilometres.
	I'd like to see it being easier to navigate the canals & moor up while passing through. Need visitor jetties at houseboat mooring locations. Don't allow canals to become a long line of moored boats.
	Enforcement of Bye Laws relating to abandoned vessels
	WI's proposed new bylaws should be scrapped
	There is an irony that WI no longer maintain navigable depths but intend to penalise boats that can't make progress and charge them for providing nothing.
	With all new charges and changes proposed i am wondering why we should bother with our spending power in Ireland's small towns and villages that badly need it and not just spend abroad and support foreign resorts
	Waterways Ireland should be fined when the canals are not navigable due to weed not being cut and low water levels.
	I think the fees are a distraction from what the new changes actually say. WI officers have no right to come on board your boat or ask you questions. Even the police don't have this right. Then they can issue fines as they see fit with no appeals until you are in a district court. I think WI don't care about boaters and spend so much on walkways
	Seeing as waterways Ireland have their headquarters in Enniskillen you would think they would notice that the facilities in the north are far superior to those on the Royal, Grand and Barrow. However, I have noticed that the harbours on the Shannon appear to be in line with the north. I feel that we (liveaboards) should pay an annual fee of around €500, as we currently do, but also pay for what we use. Pump outs for €1 or €2 are too cheap, €10 or €20 or even €30 would help waterways break even. Same with shower blocks. €1 for a hot shower does not cover the electric cost. If you call a lock keeper to do locks, this should also incur a fee. Non-liveaboards would pay the annual fee but wouldn't incur the



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Byelaw	Comment
	<p>added expense for water, pump out etc. Having the availability of bins, water and pump out for boaters goes a lot further towards keeping the canals clean than charging higher fees does.</p> <p>Enforceable laws/rules need to be put in place to stop overcrowding. Pointless having 5-day rule if it can't be enforced.</p> <p>Liveboard boats need to be allocated a mooring "spot". This would help with getting boats to move along the canals more.</p> <p>Many boaters fear moving in case they have to return to an unfamiliar mooring. Liveboards and non-alike. I would like to see more waterways staff in boats than in cars and trucks. A lot of the staff don't seem to like boating much.</p>
	<p>We have witnessed the continual decline of maintenance on the Grand Canal as a navigation over the past decade, to the point where it can no longer be regarded as a functioning navigation during the summer months. The massive fee increases and prospect of fines with no appeals process other than the courts will be the final nail in the coffin for the canal boating community.</p> <p>Conditions on the canals have become worse since that statement was made 9 years ago. Locks are in disrepair and summer weed maintenance is totally inadequate. I spoke to maintenance staff recently who told me they don't have the manpower or properly maintained machinery to do the job adequately. The notion that the meagre amount of money that would be extorted from what's left of the canal boating community would be invested back into the canal to fix things is not credible. I use the word extorted because it must be called out for what it is. Extortion is defined as "the practice of obtaining something, especially money, through force or threats".</p> <p>What WI are now saying to the Canal boating community is, we are hitting you with a massive fee increase and if you don't pay up here's your fine, and off to the courts with you if you don't pay the fine! The desk exercise KPMG report to justify the massive fee increases is flawed. It settles on the Scottish Canals as the comparator, which is like comparing apples with oranges, as it assumes that the Irish Canals are the same in terms of being functioning navigations, services, and infrastructure. WI are effectively a broke and insolvent organisation. They have more or less admitted this in their Corporate Strategy consultation document. It's no wonder that annual reports have not been published in recent years. They also claim that the economic activity generated by the waterways under their remit is €600 million annually and their ambition is to grow that to €1 billion.</p>



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Byelaw	Comment
	<p>The reality is that they need more money to do this. But coming after the boating communities for money will have the effect of reducing activity. I have been involved with canal boating for 30 years and have had to deal with senior WI staff as a liveaboard in the past, and as a current business operator. I don't believe them when they say that the current draft is "written in pencil" and that the boating community views will be taken on 'board, and changes made to the final draft. They may make some minor tweaks, but what is in the current draft is what they have been trying to achieve for years. Kildare is often referred to as the Canals County with 120km of canals passing through. Boating activity needs to be encouraged. With the millions been spent on the upgrade of the towpaths it is vital for tourism that walkers and cyclists experience a vibrant working navigation.</p>
	<p>There is some concern that some aspects of these byelaws assume a degree of good faith and fair play on the part of WI and its officers. To date that has generally been the case but it cannot be presumed that that will always be so. There are a number of places where it could increase public acceptance of the bye-laws if it was made clear in the text that permission for say extensions to mooring periods will not be unreasonably withheld and perhaps articulate some of the reasons under which such permission can be requested. e.g. bad weather, breakdown, death, illness, special events etc</p>
	<p>My experience with consultants' reports is that they invariably reflect the tacitly expressed views of the client, so it is no surprise that KPMG produced a study which reflected the WI policy of maximising revenues. It is clearly admitted in the opening sections that the report is the result of a desk top analysis of the regulatory and charging environment in a number of other administrations. There's no evidence of any tangible expertise in this area either on the part of KPMG generally or by the authors specifically. Anybody with a passing familiarity with canals in other jurisdictions will not have failed to be struck by the standard of maintenance and infrastructure provision. Few of the locations at which liveaboards gather in Ireland have comparable amenities. Suggesting an analogous charging mechanism based on the price of a two bed apartment in Dublin bears little comparison to the neglected state of mooring locations throughout the system at which few if any amenities or facilities are provided. If WI persists in introducing the charges specified in Schedule 1 of the draft bye laws, then Bye Law 39 (charges for houseboats) should not be</p>



Inland Waterways Association of Ireland (IWAI)

Members survey and Written Feedback on the Canal Byelaws

Byelaw	Comment
	enacted until the facilities to which the putative charges refer have been fully provided in accordance with applicable planning and environmental considerations.
	The vast majority of the power that WI say they require to deal with the minority who abuse the system, is already available to them under the maritime safety ACT 2005, up to and including the powers of arrest. Why have these powers not been used in the last 18 years?
	<p>While we're not part of the live aboard community we have an interest in it and feel passionately a proper live aboard policy could be of great benefit, not only to the boating community but also to the settled as is evident by experience in the UK.</p> <p>Overall the proposal of a (very) large increase in berthing fees in exchange for facilities is not without merits however a large investment in said facilities is required (pump out once again raising its head.)</p> <p>Grand Canal Dock - We know suggestions to extend moorings into the greater basin are contentious but there is plenty of scope for increased moorings in the smaller basin. We would strongly suggest a portion of these be held aside for "visitors" – the possibility of wintering in Dublin is extremely attractive. A register could be kept if necessary so no boat could use more than its fair share.</p> <p>Other Live Aboard areas. Huge scope for increasing in a sustainable way the live aboard community – two areas come to mind – the existing "de facto" one at Leixlip on the Royal Canal and the turn in the Grand Canal just before the Luas bridge near Drimnagh. There are others – Live aboard is only in its infancy in Ireland and with a little guidance has great potential.</p>
	Canal access. The railway bridge over the Royal Canal is extremely problematic. We appreciate dealing with it come with huge costs, however it needs appropriate consideration and a proper plan, not just a "bottom bucket" option
	Permanent wire moorings to the opposite banks. These are inappropriate, unnecessary, dangerous and should be removed immediately
	WI provide a basic service at most of their moorings but are proposing to charge the same as Marinas who provide many facilities for the enjoyment and safety of their boating customers.
Definitions	The definition of a family is too narrow and does not take account of modern family construction



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Byelaw	Comment
	Waterways Ireland's definition of family is incorrect and I don't think waterways should be able to tell me who can use MY boat
	Family definition needs to be brought up to date. As of July 2023, "immediate family" in the real world of Ireland includes cohabiting people's siblings, parents, children, step-children and their partners, grandparents, grandchildren, nephews, nieces, grand nephews, grand nieces, uncles, aunts, grand uncles and grand aunts. [There are changes afoot to change the archaic definition in Article 41 of the ROI Constitution.]
	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 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
	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".



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Byelaw	Comment
	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
	Replace the words canal or canals with waterways throughout. The Barrow Navigation is included in these Bye-Laws; it is a River and has both a marked navigation channel and lateral canals leading to Locks.
	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'
	Tonnage - Does this apply in 2023 as boats no longer carry freight. We now have recreational craft on our waterways where tonnage is defined relative to equipment but number of passengers are used to measure safety, i.e. insurance requirements
Regulation 4(2)(i)&(j)	The requirement to have carbon monoxide and smoke alarms is sensible and is to be welcomed.
Regulation 4 (2)(h)	Holding tanks are not an issue, Lack of pump out facilities are the issue.
	More pump outs required and kept in working condition
	A lead time to install holding tanks is necessary to allow WI time to upgrade the network of pumpouts.
	Boat waste is miniscule in the bigger picture and this is totally unviable to police. Pump outs are few and far between and



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Byelaw	Comment
	generally don't work or are inaccessible. Most modern boats have diverter valves fitted. There are more small or fishing boats than cruisers, how will that be addressed.
	No point in requiring holding tanks when there are VERY FEW pump out facilities, and those that do exist are invariably blocked by other boats mooring by them
	No changes should be made to holding tanks until pump out stations are installed and working properly along the river Barrow and canals
	Where are the pump out facilities?
	Holding tanks are great but where do you pump out?
	To bring boats into compliance a grant similar to septic tank grant should be introduced. Facilities should be in working order in all public harbours, towns/villages.
	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. I believe every Boat fitted with a toilet should not discharge into the navigation system as this affects others users
	Waterways Ireland *MUST* commit to providing pump-outs within agreed timeframe
	I would like to see more chemical toilet emptying facilities, giving boats the option where more pump-out points are not feasible. Suggested solution to a full holding tank : a 'porta potti' or similar could be used on board in reserve, until the boat arrives at a serviceable pump-out
	More working toilet facilities and water points needed along Royal and Grand Canal and more mooring posts on canal banks, ideally close to locks. Ideally facilities for emptying cassette toilets
	Services such as pump out facilities must be in place before new byelaws are enacted
	Many more pump out locations should be offered and guaranteed to be in working order, or people will continue to dispose illegally
	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. The principle of not setting people up to fail should apply



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Byelaw	Comment
Regulation 4(2)(k)	The requirement to have a Builders Plate fitted to vessels constructed after 2023 is not onerous on the current fleet, given that many are of a significantly earlier vintage
	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 4(2)(l)	Most engines will have a specification plate of some kind. However, some engines are so old as to have been manufactured long before the introduction of CE markings. A derogation might be considered.
	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. 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.
	CE (<i>Conformité Européenne</i>) Certification, introduced within the European Union in 1998, applies to new recreational craft of 2.5 to 24 meters in length. It confirms they were built to comply with a set of technical, construction, safety and legal requirements and gives them a Category of A, B, C or D, based on the Beaufort Scale (wind and wave height). A plate is fixed to each boat showing the Category.
	The requirement for CE compliance for new boats will: <ul style="list-style-type: none"> a. Eliminate traditional craft boat building, b. Eliminate the building of one off bespoke design, c. 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
Regulation 4(2)(m)	This imposes an obligation that many older engines could not comply with. The referenced Directive relates to 2013, while many engines are significantly older than that.
Regulation 4(2)(o)	The Importers Plate requirement is similarly unreasonable, given that it would be virtually impossible to acquire a Plate for the majority of vessels imported into Ireland over the years if there is not one affixed already. It is suggested that Bye Laws 4.2 (k) to (o) be reworded so as to apply in their entirety only to vessels constructed/imported after the date of coming in operation of the bye laws.
Regulation 5 (1)	The "Skipper" not "Master"



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Byelaw	Comment
	Change to “or boat used on the waterways” – these Bye-Laws include the River Barrow, the Barrow Navigation.
Regulation 5 (1)(b)	Suggested wording - a suitable anchor and sufficient chain or rope appropriate to the tonnage and type of the vessel, and the ground and flow where anchoring.
Regulation 5 (3)	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 6(2)	Many vessels’ gas installations would have a difficulty in complying with ISO10239. Few RGI technicians would look at carrying out certified remedial or maintenance work on a canal barge
Regulation 8	Missing requirement for Engine Room Fire Extinguisher and Fire Blanket.
Regulation 8(3)	Fire extinguishers - would a safety certificate be more beneficial. Something similar to that required by the Canals and Rivers Trust in the UK. This is a 4 year intensive check carried out by a trained boat surveyor. They will check all gas and fuel fittings etc as well as fire extinguishers and detectors, and more. The certificate can be shared with WI, they can then issue navigation licences accordingly etc If adopted all involved will know what is happening and when - once every four years, all recorded on a database
	If a fire extinguisher fitted with a gauge is in the green why does it need testing this should be changed
	Fire extinguishers should only need to be in good working order. Annual servicing and verification is unduly onerous.
	Use the same wording as the Shannon Byelaws. This is not feasible
Regulation 10(q)	Is kiln-dried wood considered smokeless?
	The applicable LA rules re burning of fuels should apply
	The clause on the burning of fuel that causes the emission of fumes, makes absolutely no sense, as all fuels emit fumes
	Smokeless fuels is outside the remit of WI
Regulation 11	Should reference the dimensions for the Royal and Barrow as well
Regulation 11((1)&(3)	This clause doesn’t seem right. The area between Griffith Bridge and L36 is useable by larger vessels. (e.g. St Patrick, Liverpool etc in Shannon Harbour)
Regulation 12	This section should harmonise with the Shannon bye-laws.
Regulation 12(2)	What is the definition of “competent crew”, given that there is currently no standard of competency for vessels on the inland waterways.
Regulation 17(2)	Needs clarification. If we assume the stream flows from the summit level down, what happens on the summit level or on dead-end/back-fed branches like Edenderry ? (and being really pedantic,



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Byelaw	Comment
	for some of the time the bottom level in Shannon Harbour flows from 36 th to 35 th because of the back-pumping!)
Regulation 18(1)	Suggested word doing....in such a manner that would endanger, injure, damage, obstruct or harass other users of the waterways or damage any property
Regulation 18(2)&(3)	Need to harmonise this with Shannon Byelaws. If 3.5kts is considered safe for canal, why not on Shannon. Why 6kts on Barrow and only 5 on Shannon tributaries. And Shannon bye-laws should have a caveat about safe operation too.
Regulation 19(2) to (5)	Items 2 to 5 do not apply to canals. When navigating the Barrow Navigation and the Canals, sailboats with suitable keels, stow their masts and use their engines to get from Waterford to the Shannon or to Dublin. The Irish Canals are not suitable for sail boats. However, there is a need to include those using Paddleboards on the Canals and Barrow Navigation, and to set out some guidelines on right of way, etc.
Regulation 20(a)	For a barge, using a stop rope and tick-over revs is usually safer than bow and stern warps because you can't get enough of an angle on them to hold the boat centrally in the lock. And the boat should not be "secured" it should be held on sliding ropes
Regulation 20 (f)	It is common practice, even among WI staff, to close racks prior to closing gates. The point is not to open an upstream rack and allow the deep gates to slam under the water pressure.
Regulation 22(d)	5-day rule Shannon Harbour and Richmond Harbour - Agree provided there is a place set aside for boats to moor when getting work done before or after entering the drydock. Shannon Harbour, the only working canal harbour, is required to ensure barges/boats are safe and have insurance.
	In Shannon Harbour and Richmond Harbour, the service block side should have 5 day rule for summer peak months.
	A visiting boat section with a 5 day rule would suffice in both Shannon and Richmond Harbours. Not the whole harbours. It will take business away from both harbours
	Richmond and Shannon harbour should be all year mooring restrictions
	5 day rule in SH and Richmond should not be the whole harbour. Just from the lock to the bridge in Richmond and toilet block to bridge in SH. Also would apply 6 day rule to fit with the standard usage pattern instead of 5 day rule
	The 5 day rule is ok, unless permission for an extension from W.I. (e.g. Lock keeper / Patrolman notified) has been agreed. Perhaps a 12 day (2 weeks) rule would be more enforceable.



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Byelaw	Comment
	This should be 6 days to facilitate and encourage people who wish to cruise the navigations throughout the season
Regulation 22(e)	Agree IF WI offer alternative 5-day moorings for visitors touring Dublin City and County, and WI allow navigation on both Dublin Canals. Needs to include requirements of recreational boaters who work a 5-day week to allow them to move their boat at the weekend. The system also needs to include those who cruise over the summer and require winter moorings when not on board and maintenance work is happening on the canals
	Given the effort required and the associated risks in the Dublin part of the trip, boats should be allowed to stay at least 30 days at safe mooring in Dublin GCD.
	This would prevent IWAI members in Dublin from keeping (non liveaboard) boats there
	Limits on metropolitan Dublin effectively closes Dublin without WI permission. Reg 22e will impact Dublin Rally. Shouldn't need a special exemption for this
Regulation 24(1)	Going aground in the canals is part of the experience. There are known shallow spots where a bit of "touching bottom" is inevitable and expected by many skippers. I'm sure WI don't want to hear of every such incident.
Regulation 27	Casual camping along the canals has to my understanding always been accepted. It's essential for people touring in canoes or open boats. I understand that there's an issue in relation to homeless people etc but maybe a specific reference to touristic camping is warranted.
Regulation 29	What defines "Commercial operations". Do casual book stalls operated by IWAI/HBA/RNLI etc constitute "commercial operations. What about a jumble sale organised as part of a rally?
Regulation 351)	Mentioned are a couple of Invasive Species that grow in our hedgerows. But of much more importance to our inland waterways are those that are invading our canals and harbours, and are preventing vessels from moving during the summer months. These disperse from garden centres, to garden ponds and water features, to the wild including our canals and harbours or wherever there is a body of still water. Cleaning and disinfecting the hulls of boats and barges before entering new waters is not a viable solution because of the lack of drydock facilities and personnel to operate them. Suggested wording - 'No person shall introduce intentionally or unintentionally Aquatic Invasive plants into our waterways including [Name the top five invasive aquatic plants in the Irish inland waterways].



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Byelaw	Comment
Regulation 35 (8)(a)	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 35 (9)(a)	This needs a clearer definition of “diving”. Does it just cover SCUBA diving? What about snorkelling or free-diving? What about divers with surface fed air? We 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 35 (10)(a)	Swimming in the canals is very common and part of the local culture in certain areas. Would we really want to stop it?
Regulation 37	It is amazing that in all the requirements being placed on vessel owners, WI blithely assert that they make no representation or warranty as to the condition of the canals. Is that really acceptable?
Regulation 38	Believe WI is an All Ireland body, Erne members should pay like everyone else in the South, but, with no Stormont Assembly the Byelaws cannot be enacted up there.
	Permit should be for 12 months form date of purchase
	Besides Monasterevin, there are no indications of mooring places on the Barrow Line and the Barrow Navigation. For example, are Graiguenamanagh and St Mullins places where moorings are available under the Annual Canals Permit? For Houseboat Moorings, where is considered Urban and where is considered Rural on both the Barrow Line and the Barrow Navigation?
Regulation 38(1)	“other than houseboat permit holders” This appears to imply that only leisure boaters will be required to pay the annual E200. Is that correct? There is no similar fee stated in bye law 39. The requirement for an in water survey within the previous five years is opaque. To what standards will such a survey be carried out? Who will do it? Will WI publish a list of licensed surveyors to whom surveys can be entrusted? This will be an additional cost on owners, in addition to mandatory third party insurance and an increased annual permit charge. Until survey requirements are stated, this should not be a requirement
Regulation 38(2)(a)	Does this mean they can moor up for as long as they like? Then why pay €500pa for an unserviced rural houseboat mooring?



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Byelaw	Comment
Regulation 38(2)(c)	This kills all future cruising in Dublin, apart from being flushed through the city by WI staff.
Regulation 38(2)(d)	This will prevent me mooring for the winter where I have done for almost 30yrs. There are environmental, safety and expense implications. I will have to drive much further every weekend to check on the boat expelling more carbon and other exhaust gasses. With fuel costs being so high, it will be much more expensive and I have people who keep an eye on the boat who no longer will be able. It puts my property under threat. It's also discrimination against Dublin based boat owners who actually move their boats every year. And it reduces boat movements
	No provision for long-term mooring for recreational boaters between L12 and L16 (suburban). Many stalwart members have availed of this for many years.
	Again, this kills cruising and short stop overs in this area. Effectively it extends the Dublin no-go area further west. Many of these clauses are attempts to control liveaboards, the proposed fines should be adequate for that purpose.
	Byelaw limiting vessels without a houseboat permit from mooring between the 16th and 12th locks on the Grand and Royal Canals and within 1km of Belle Harbour for more than 10 days per month. this should be increased to 15 days
	New limit of boats between 12-16th locks will turn off winter migration of boaters
Regulation 38(3)(b)	Vessels on the Shannon Navigation don't require this. So a vessel registered on the Shannon without this can use the canals. It seems an un-necessary provision if the 3 rd party insurance clause is in place.
Regulation 39(3)	Does this preclude AirBnB type boats?
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
	Boats with an LPG system should have an LPG alarm fitted and in working order. These alarms can easily be tested by a button press.
	WI should come to some arrangement with local authorities regarding supply of working water taps along the river Barrow and canals. The navigation from Clashganny lock has serious silting problems just below the lock and also below Upper Tinahinch lock and is not navigable for most of the summer. The lock gates between Graiguenamagh and St. Mullins have many mechanical faults on-going for many years and the immediate area above the



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Byelaw	Comment
	St. Mullins lock needs attention as it is silting up and the banks are falling in.
	Rubbish facilities should be available in WI blocks in a system where users pay using a smart card. This should be widely available
	More berths in Grand Canal Dock with some exclusively for short stays
	Is it legal for WI officials to enter your boat? it's private; it's all a bit coercive
	All shaft drive boats leak what about pumping out of this bilge water?
	An annual life jacket survey should be required
	Having boats built after 2023 is not a good idea. It would be better to have a condition survey every 5 years
	Make sure Garda are enabled to enforce byelaws when needed , swimming in harbours , climbing on boats , being disruptive etc
	There needs to be an appendix to the byelaws, which lays out the permit application form and any additional conditions which require written acceptance
	Whom and what qualifications will the "authorised person" be required to have; this should be written into the bylaws
	Regarding organised events, will written permission from Waterways Ireland be required for all organised events i.e. walkers, cyclists, fishermen and boaters?
	There would appear to be discrepancies in the requirements for the different navigation systems i.e. Canal, Shannon and Erne – Why?
	WI as the sole Inland Navigation authority is in a monopoly situation, is this not a breach of the monopoly regulations?
	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 size/weight/structure/location of one or other of the vessels makes it inadvisable.

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Members survey and Written Feedback on the Canal Byelaws

Byelaw	Comment
	Are we going to be issued with a multi use card for the year for accessing the facilities
Schedule 1	WI should adopt the IWAI suggested fees for houseboat moorings
Fees	The charges proposed are too expensive for ordinary boat owners
	Liveaboard fees went from 1250euro P/A to 1500euro in the space of 2years. Most are O A Ps .When will WI make a fixed rate for such people? Conditions on the waterways i e weeds are shameful, lots of boaters will not travel on the canals because their boats get damaged. It would be worth doing a survey on the number of boats using the canals in recent years
	How much did KPMG charge. The comparisons don't give a true reflection of the situations. No routine dredging is maintained. The massive increase in houseboat charge is a money grab. WI mission should not be to maximise revenues but make all waterway safe and not sell lands that it inherited.
	€200 registration fee is ok but does not allow WI to then increase
	Fully service moorings in City Centre France to include electricity and water is €1600. The proposed charges are exorbitant and not reflective of EU Prices. Time for WI to visit other countries and learn
	If the objective is to develop a thriving canal based community, particularly in the urban area (Greater Dublin) then the associated charges with liveaboards must reflect the general city accommodation costs and can thus demand the relevant standard of services. It won't or is unlikely to work and mature if the cost structure is all one sided, all services and no charges. If not carefully managed we could end up with floating tenements / slums
	There should not be a distinction on annual fees between users of the Shannon and Erne and between those on the canals. Owner/operators of all craft on the waterways, including hire craft operators should pay a fee somewhat similar to road tax for cars. This must be ring fenced for maintenance and enhancement of the waterways.
	IWAI should insist that the boat owning community should not be the only group of users who are charged a fee to use the waterways. Either everybody pays or else nobody pays. Waterways Ireland should be funded from the public purse in both jurisdictions. Private boat owners should not be made to pay when other users such as Canoe Clubs, Fishing Clubs, Walkers, Cyclists etc do not have to pay anything to use these facilities. Commercial users on the other hand should pay a proper commercial rate for



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Byelaw	Comment
	the infrastructure that they are using such as Quay wall or berth and also for vehicular access to carry passengers or to vend foods stuffs etc to members of the public
	Heritage boats should have a nominal fee similar to vintage cars.
	Dry dock proposals are madness. Dry docks should be made more accessible to allow for maintenance of boats.
	The pricing is too high. The prices have just been plucked from thin air and there is no real definition or anything defining a mooring let alone what is 'serviced' and 'unserviced'. It's rushed and shoddy.
	The pricing of houseboat permits at 7500 for Dublin is very expensive. I don't necessarily have a problem with the prices overall. I think the designation of suburban and rural is kind of wrong and what that means for other boaters
	As an owner of a 40yr + boat , I am under immense financial pressure to change what was a happy hobby to stressful hobby to meet current regulations... differentiation and allowances need to be made towards the age and type of craft
	Houseboat permit charges should be aligned with the proposed charges in the IWAI draft residential mooring policy
	Annual houseboat permit charges should be in line with what was proposed in the IWAI draft policy document
	The level of maintenance of waterways and increased service blocks needs to be improved greatly before any charges are brought in
	Any proposed fees must be appropriately index-linked, for example €4000 rising to €7500 over 6 years is not index linked.
	Those private businesses ie canoe hire, adventure trips, should be charged for the use of the system where they have multiple craft on hire.
	WI should do what they were formed to do, Manage the waterways and make them fit for purpose i.e deep enough for decent navigation and not "just enough", clear of weeds, reed beds along the banks and other rubbish, have working infrastructure and water feeders to enable navigation. Employ people who know what waterways are for - Boating. Employees who can say "Yes", Who listen, learn and act on the experience of the Users who know the problems on the ground/water, Nothing should be too hard for them to do. They should know from experience how waterways work, and are not just paper pushers transferred from some other Govt Dept. WI must encourage the development of Residential Moorings (private or WI Owned)and Marinas especially in Urban Areas. Blueways etc are not or should



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Members survey and Written Feedback on the Canal Byelaws

Byelaw	Comment
	not be part of the WI brief or part of the WI Budget expenditure. This is a job for Failte Ireland or the local Co.Co.
	I live on my boat and have a fixed no- contributory pension. So am quite worried!
	Once off registration fee
	We are currently experiencing a huge cost of living crisis, housing shortage crisis, and rental cost crisis. W.I. are demanding a 400% increase in fees. I will not agree to this. I would rather be permit less than fork out stupid amounts of money - for no improvements whatsoever. I have moored at Confey for the past 4 years - I have paid my EMP. I receive nothing for that fee. I expect nothing for that fee - it is a gift to W.I. as they do nothing for me and have done nothing for me in the past 4 years. I don't demand anything from them. The permit fee of 278.00 is equivalent to a property tax of a modest house in the suburbs – nothing more. I do not even receive the same services that a homeowner receives for their property tax
	126 euro at the moment so an extra 74 euro which covers the Shannon is not an issue
	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
	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
	It would be fairer if the annual registration 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



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Byelaw	Comment
	tax would be fairer. Modern technology can be used to ensure the admin burden is not excessive.
	The nub of the opposition is to the introduction of a liveaboard charging regime which many will find difficult to afford. This may have the unintended impact of either forcing liveaboards off the water, which they can't afford, or of forcing owners to exist in contravention of the law. Neither option is palatable.
Schedule 2 Fixed Penalty Notices	Fixed penalties without an independent appeals mechanism is a nonsense. Fixed penalties do not need to be set at €150, a lesser fee is allowable.
	Fixed penalty fines without any appeal is totally unacceptable, WI have a cheek to just brush it off by saying, appeal to judge, as if the judicial system has nothing better to do. WIs excuse that they need these new powers to deal with the small numbers who abuse the system does not hold water, they already have this power under the Marine Safety act 2005, and have not used it in the last 18 years
	Increase Penalties for hogging with repeat offenders paying more
	Fixed penalties – if a boat owner has a temporary problem over moving within the time frame, it should be made clear to contact W I first to inform them and agree solution. Not just leave boat without any information
	We need a right of appeal on WI decisions - as much as we may be wrong on occasions so might they and held accountable
	The fixed penalties are a step too far.
	An independent appeals process is essential to allay fears of users
	The only issue I have with the fixed penalty notice is the lack of an independent appeals procedure
	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. Even merchant shipping get notice of noncompliance for breeches before fines.
	Permits and fines to be by sticker as well as electronic.
	Regarding fixed penalty notices and authorised officers. There needs to be transparency here regarding the ethical boundaries of authorised officers. This has to be rolled out in a way where by the authorised officer is not acting on any pre-existing biases towards any boat owner.
	There should be a fine for mooring on taps & pump outs for weeks/years on end. Totally unacceptable



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	No appeal process for the fixed payments fines
	There needs to be written criteria/procedures for the issue of these fixed payments fines
	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 (eg 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
	The lack of an administrative appeals process is unacceptable. The permissive facility to appeal to the District Court is dismissive of the concerns of boaters. There are numerous instances of administrative fines (e.g. clamping) being capable of appeal to an independent authority which negates the need to indulge in legal proceeding in court. WI should establish an independent appeals process as a precursor to court proceedings.