

Framing Stakeholder Engagement

Discourse Analysis of Ireland's Third Cycle River Basin Management Plan



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Abstract

Stakeholder engagement is viewed as crucial for environmental governance, especially in regard to common-pool resources (CPRs), such as river basins. This study investigates the conceptualisation of stakeholder engagement in Ireland's third cycle River Basin Management Plan (RBMP). The study examines the underlying presumptions and representations of stakeholder engagement in governmental discourses by utilising Carol Bacchi's (2009) "*What's the Problem Represented to be?*" (WPR) approach and Elinor Ostrom's (2015) theoretical framework of *Governing the Commons*. Whilst stakeholder engagement in Ireland's previous RBMP cycles were criticised for being inadequate, the third cycle (running from 2022-2027) seeks to improve participatory methods. The study emphasises how crucial stakeholder education, ongoing involvement, and multifaceted collaboration are to sustainable management of river basins. It also points out important presumptions about the abilities, readiness, and fair access of stakeholders, which could have an impact on how successful these participatory methods are. The results highlight the significance of adaptive governance frameworks for addressing power imbalances and incorporating input from a variety of stakeholders to achieve sustainable water management outcomes.

Key words: River Basin Management, Stakeholder Engagement, European Water Framework Directive, Ireland, Governing the Commons

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1. Introduction

In the current climate of growing concern regarding sustainability, issues of sustainable water management are being increasingly debated amongst scholars (Arenas & Baudoin, 2018; Hermanowicz, 2008; Marlow et al. 2013). Simultaneously, a plethora of policies and legislations have been implemented within the last few decades to ensure sustainable practices. Although it is commonly agreed that stakeholder engagement is a vital aspect of sustainable river management (Lim et al. 2022), the actual influence of stakeholders in many management practices have been criticised, especially during the assessment and monitoring phases, resulting in flimsy participation strategies (Salamanca-Cano & Durán-Díaz, 2023).

This study explores the conceptualisation of stakeholder engagement within government discourses surrounding Ireland's third cycle River Basin Management Plan (RBMP). The study will adopt Hemmati's (2002) definition of stakeholders, leading "[...] those who have an interest in a particular decision, either as individuals or representatives of a group. This includes people who influence a decision, or can influence it, as well as those affected by it" (Hemmati, 2002, p.2). In accordance with the European Water Framework Directive (WFD)¹ stakeholders and the public must be engaged within the planning process and execution of RBMPs. Nevertheless, Ireland's previous two river basin management cycles (running from 2009-2015 and 2018-2021) were criticised for their lack of public and stakeholder engagement (An Fóram Uisce, 2019, p.27). Therefore, stakeholder engagement is seen as a fundamental aspect for improvement in the third cycle RBMP, which is currently active between 2022 and 2027.

Inspired by the work of Elinor Ostrom (2015) "Governing the Commons: The Evolution of Institutions for Collective Action", this study utilises the idea that common-pool resources (CPR) do not have to lead to depletion. Challenging traditional concepts such as the tragedy of the commons, prisoner's dilemma game, and the logic of collective action, this study derives from the idea that CPRs can survive through collective actions (Ostrom, 2015, pp.2-5, 50). One of the principles of Ostrom's framework is participation in rulemaking (ibid, p.93). In this study,

¹ There are numerous abbreviations of the European Water Framework Directive, such as "the Directive" and "EWFD". However, in this study it will be referred to as "the WFD".

participation of stakeholders in rulemaking is viewed as essential in achieving sustainable river basin management.

This study also uses Carol Bacchi's (2009) "What's the Problem Represented to be?" approach to identify how stakeholder engagement has been problematised within publications made by the Irish government surrounding the third cycle RBMP. The purpose of using Bacchi's policy analysis question framework is to determine how the Irish policies frame the issue of stakeholder involvement by analysing the three documents and then, by applying two of Bacchi's (2009) questions².

Foremost, an introduction and outline of the research will be presented. This will be followed by a background of the topic, the conceptual framework, and the method and material that will be used. Lastly, an analysis of the discourses and a theoretical discussion will be presented, followed by a concluding section.

1.1 Purpose and Specific Aims

This study aims to understand the notion of stakeholder engagement presented by the Irish government in relation to the third cycle RBMP. The purpose of this is to create a greater understanding of Ireland's implementation of the stakeholder criteria of the European Water Framework Directive. Nevertheless, the application of Elinor Ostrom's theory of Governing the Commons will allow for a comprehensive analysis of whether Ireland's discourses align with world renowned theories on governance of CPRs or not.

The research question to be explored is therefore; *"How does the third cycle of Ireland's River Basin Management Plan conceptualise stakeholder engagement?"*

1.2 Relevance and Scope

It is crucial to the disciplines of both political science and development studies to carry out a case study on how stakeholder participation is portrayed in Ireland's RBMP. Such case study offers important insights into how inclusive and participatory governance may improve the

² Bacchi's (2009) questions can be found in Figure 2.

results of sustainable development in the field of development studies. It looks at how various parties, such as government organisations, environmental advocacy groups, and local communities, participate in decision-making processes. This knowledge is essential for creating development interventions that are social and sustainably inclusive and for making sure that all voices - especially those of marginalised groups - are heard and taken into account during the creation and execution of policies (Reed, 2008; Gaynor & Kasymova, 2014).

This study sheds light on the dynamics of governance institutions and policy-making in a democratic setting from a political science standpoint. It explores how different governmental tiers interact, the power of non-state players, and how the general public shapes environmental policy. The comprehension of the power dynamics, the openness of the policy-making procedure, and the responsibility of governmental actions is contingent upon this approach (Carrozza, 2015; Koppenjan et al. 2009). Furthermore, it can demonstrate how successful stakeholder involvement can result in more adaptable and robust policy frameworks, especially when it comes to managing CPRs, like river basins (Swyngedouw, 2005).

Nevertheless, the relevance of studying the chosen subject can be argued for through Giddens' structuration theory, which holds that social structures affect and change individual behaviour while individual actions also alter social structures, filling the gap between structure and agency. The reciprocal relationship underscores the ongoing interplay between human behaviour and cultural norms, highlighting the possibility of dynamic social change (Edwards, 2016). This dichotomy is seen in Ireland's water management policies, where stakeholder participation is guided by statutory frameworks yet policy progress is influenced by stakeholder activities and input. According to Giddens' theory, stakeholders have the agency to change and reconfigure these structures, even while they also constrain and direct their actions (Rose & Lewis, 2001). We can comprehend how institutional frameworks both promote and restrict stakeholder participation, and how stakeholders might influence policy improvements, by examining Ireland's policies.

2. Background

2.1 Participatory Approach to River Basin Management

Participatory approaches to river basin management can be defined as those that allow the involvement of all interested parties, such as stakeholders and the public, in decision-making processes and operational activities of governance with the aim of allowing them to have a positive impact on the final outcome (CIS, 2003). Furthermore, as participation is regarded as a fundamental aspect of sustainable development (Costanza et al. 2000; Wagner et al. 2002), participatory decision-making is considered to be a crucial component in the management of sustainable river basins. Numerous international laws and policies have been established to promote participatory processes such as, Agenda 21 which was ratified at the United Nations Earth Summit held in Rio de Janeiro in 1992 (UN, 1992a), the International Conference on Water and the Environment (ICWE) in Dublin in 1992 (UN, 1992b), the UNECE Aarhus Convention (UNECE, 1998), the SEA Directive (2001/42/EC; EC 2001) and Public Participation Directive (2003/35/EC; EC 2003).

Many publications highlight the advantages of participatory approaches which includes; increased public awareness on various environmental issues and local catchments issues, the avoidance or decrease of potential conflict of management, capacity building, and public acceptance and support (CIS, 2003; Demetropoulou et al. 2010; de Stefano, 2010; Hassenforder et al. 2015; Ker-Rault & Jeffery, 2008; Luyet et. al., 2012; Mostert 2003; Mostert et al. 2007; Pahl-Wostl et al. 2008; von Korff et al. 2010). Participatory approaches also allow for the inclusion of stakeholders' knowledge and experiences which could further improve the quality of River Basin Management Plans. Furthermore, participatory approaches may also increase social learning, promote sustainable development, and strengthen implementation procedures.

There are over 30 different types of participatory techniques within integrated river basin management (Mostert, 2003). Therefore, there is no comprehensive or standardised approach available (Luyet et al. 2012).

2.2 European Water Framework Directive

The European Union (EU) and Norway sanctioned the Water Framework Directive (WFD) on December 22nd 2000 (2000/60/EC; EC 2000). The WFD is considered the most significant legislation for river ecosystem management within the EU (Hödl, 2018, p.325). It aims to establish an integrated and harmonised approach for integrated water resources management, specifically focusing on river basin districts. The Directive is part of the European environmental *acquis communautaire* and holds legal obligation for all EU member states (ibid, p.331). Its main objective is to prevent further deterioration and protect and enhance the status of aquatic ecosystems (Carvalho et al. 2019). It also promotes sustainable water use and aims to improve the protection of the aquatic environment (Furse & Logan, 2002). Furthermore, the Directive ensures the progressive reduction of pollution of groundwater and prevents its further pollution (Ohandja et al. 2010). It contributes to mitigating the effects of floods and droughts by applying a river basin approach (Carvalho et al, 2019).

The WFD is strongly influenced by the guiding principles of the European environmental laws, such as the precautionary principle and the principles of taking preventative action and rectifying environmental damage at the source (Hödl, 2018, p.332). It also emphasises the importance of holding pollutants responsible for their actions (ibid).

Through article 13³, the WFD stipulates a clearly defined 6-year implementation cycle that begins with a report summarising all elements of the River Basin Management Plan (EC, 2000). Furthermore, according to article 5⁴, it includes an analysis of the characteristics of the river basin district(s), pressure and impact analysis, and the definition of a Program of Measures (PoM) to achieve the environmental objectives through article 11⁵. The latter establishes the framework for planning river basin management during the six-year implementation phase (ibid).

³ Full content of article 13 can be found in appendix 1.

⁴ Full content of article 5 can be found in appendix 1.

⁵ Full content of article 11 can be found in appendix 1.

To enhance citizen involvement in water management in Europe, Article 14⁶ emphasises the active participation of all stakeholders in implementing the WFD. This includes; public participation in the production, review, and the updating of River Basin Management Plans with specific timelines for feedback and comments. More specifically, new River Basin Management Plans must be made available to the public for three years, the overview of water related management issues for two years, and then the draft of the RBMP one year before the final publication. Stakeholders then have six months to comment on the documents. The goal is to ensure that diverse interests are considered throughout the implementation process and that plans, programs, and measures are effectively implemented (EC, 2000).

2.3 Irish River Basin Management Plan

The distinct geographical and hydrological characteristics of a river basin are essential for tackling a multitude of challenges that affect the basin as a whole, such as the amount and calibre of surface and groundwater resources that are accessible within the basin (Camara et al. 2019). A river basin's water resources can be greatly impacted by a variety of activities, including agricultural operations, industrial and commercial activities and residential development. As such, it is essential to set up a river basin-specific, efficient system of water governance (ibid).

Based on the WFD and the Organisation for Economic Cooperation and Development's (OECD) principles on water policies, the River Basin Management Plan (RBMP) outlines the necessary actions to preserve and enhance water quality in Ireland. The RBMPs overarching goal is to manage Ireland's natural waters, preserve freshwater resources, and sustain and enhance the country's aquatic environment (O'Connor, 2021, p.2; O'Riordan et al. 2022, p.2).

The third iteration of the RBMP, which currently runs from 2022 to 2027, has evolved from the previous two attempts, which occurred during the period of 2009-2015 and 2018-2021, respectively. The current third cycle RBMP has adopted a mixed approach, concentrating on both top-down and bottom-up methods to strengthen river basin institutions (Antwi et al. 2021).

⁶ Full content of article 14 can be found in appendix 1.

This iteration emphasises public participation to a greater extent than the preceding cycles (An Fóram Uisce, 2019, p.27).

3. Theoretical Framework

To better understand Ireland's conceptualisation of stakeholder engagement, this study will utilise the theory of Governing the Commons, provided by Elinor Ostrom in her work "Governing the Commons: The Evolution of Institutions for Collective Action" (2015). The theory challenges Garrett Hardin's concept of the Tragedy of the Commons, which posited that public resources are destined to be depleted due to individuals' incentives to act in their own self-interest (Ostrom, 2015, pp.2-3). It also challenges the prisoner's dilemma game which demonstrates how people behaving selfishly might result in less than ideal consequences for a group (ibid, pp.4-5). In contrast, Elinor Ostrom argues that communities can successfully manage shared resources through a system of rules and collective actions. Ostrom introduced the concept of common-pool resources (CPRs) and outlined the key principles that contribute to their effective management. Ostrom refers to CPRs as "a natural or man-made resource system that is sufficiently large as to make it costly (but not impossible) to exclude potential beneficiaries from abstaining benefits from its use" (Ostrom, 2015, p.30). Through her research, she emphasises the significance of local knowledge, collective decision-making, monitoring, and graduated sanctions in sustaining shared resources (ibid, pp.93-94). Ostrom's work provides a framework for sustainable resource management and offers valuable insights for policymakers, environmentalists, and anyone interested in the governance of commons resources, such as river basins (Cumming et al. 2020).

3.1 Governing the Commons

The theory of Governing the Commons is considered a fundamental concept in the context of sustainable resource management (Coelho, 2014). This perspective emphasises the importance of cooperative behaviour, well-structured environmental management plans, and effective communication among stakeholders. When faced with the challenges of resource sharing and utilisation, all parties involved must work collaboratively and align their actions towards a common goal (ibid).

Elinor Ostrom (2015) presented a groundbreaking perspective on the examination of shared resources. She demonstrated the capacity of groups of individuals to organise the governance of shared natural elements. Ostrom asserted that people utilising shared property must reach some consensus in order to prevent the destruction of jointly owned resources. She emphasised the significance of establishing transparent decision-making procedures for the management of collective property. Ostrom suggested that developing organisations that align with the interests of stakeholders may assist people in avoiding catastrophic outcomes predicted by scientists regarding the use of shared resources. Ostrom underscored the critical role of transparent procedures in facilitating effective communication and establishing a self-governing regime. Thus, the inter-group management of natural elements represents another example of the development of a combined monitoring and application system (Ostrom, 2015, p.91-102). Ostrom composed eight design principles that characterise essential elements to help account for the success of CPR institutions (ibid, p.90).

Figure 1: Ostrom’s design principles (cited from Ostrom, 2015, p.90)

Design principles illustrated by long-enduring CPR institutions	
1. Clearly defined boundaries	Individuals or households who have rights to withdraw resource units from the CPR must be clearly defined, as must the boundaries of the CPR itself.
2. Congruence between appropriation and provision rules and local conditions	Appropriation rules restricting time, place, technology, and/or quantity of resource units are related to local conditions and to provision rules requiring labour, material, and/or money.
3. Collective-choice arrangements	Most individuals affected by the operational rules can participate in modifying the operational rules.
4. Monitoring	Monitors, who actively audit CPR conditions and appropriator behaviour, are accountable to the appropriators or are the appropriators.
5. Graduated sanctions	Appropriators who violate operational rules are likely to be assessed graduated sanctions (depending on the seriousness and context of the offence) by other appropriators, by officials accountable to these appropriators, or by both.

6. Conflict-resolution mechanisms	Appropriators and their officials have rapid access to low-cost local arenas to resolve conflicts among appropriators or between appropriations and officials.
7. Minimal recognition of rights to organise	The rights of appropriators to devise their own institutions are not challenged by external governmental authorities.
<i>For CPRs that are part of larger systems</i>	
8. Nested enterprises	Appropriation, provision, monitoring, enforcements, conflict resolution, and governance activities are organised in multiple levels of enterprises.

The establishment of a community-based system of regulations for the management of shared resources has emerged as one of the most effective solutions (Herzberg, 2020). Elinor Ostrom’s research on the Governing of the Commons emphasised that the management plan should evolve in a manner that aligns with the needs of the people and provides them with the opportunity to govern themselves effectively (ibid). Developing a set of laws that are well-suited for the management of shared resources and the prevention of overuse is a strong foundation for ensuring the sustainable management of natural resources. Another key insight from Ostrom’s research is the importance of leveraging technology to support the process. The integration of community governance, technological advancement, and legal framework will result in the long-term, collaborative management of shared resources as a comprehensive solution to the tragedy of the commons (Amabilé et al. 2018).

Garrett Hardin, the predominant theorist surrounding the concept of tragedy of the commons, suggests that individual self-interest can lead to the depletion of shared resources (Ostrom, 2015, pp.2-3). However, the research conducted by Elinor Ostrom proposes viable solutions to address the challenges inherent in collective efforts. Ostrom’s findings counter the argument that CPRs are inevitably overexploited and depleted due to individuals’ selfish motivations. Instead, she supports the perspective that those within CRPs can establish appropriate rules to prevent the “tragedy” predicted by Garrett Hardin. Ostrom advocated for self-governance and the development of local-level rules, offering an alternative to the extremes of authoritarian state control and privatisation. Her research examines the structural details of how citizens interact

with real-world CPRs, providing valuable insights for designing beneficial, cooperative approaches that communities can develop for themselves (ibid, pp.182-214).

4. Methods and Materials

4.1 Research Design

To answer the research question, this study employs a qualitative approach in the form of a single case study, allowing for a comprehensive analysis of stakeholder engagement in the context of Ireland's RBMP. This study's qualitative approach enables a thorough examination of intricate problems and offers in-depth insights into the complexities of stakeholder participation in river basin management (Robson & McCartan, 2016, p.20). A case study, according to Bryman (2012, p.66), offers a thorough and in-depth examination of a single instance that enables the researcher to sort through its complexity and unique characteristics. A case study enables the researcher to examine a phenomenon - namely, stakeholder engagement - in-depth within its real-world context, which in this case is the Irish river basin management (Hague et al. 2016, p.92). The case of Ireland has specifically been chosen due to its recognition of the failures of previous attempts to incorporate stakeholder engagement (An Fóram Uisce, 2019, p.27).

As this study is a discourse analysis, there is particular focus on the language used by the Irish government, which is then examined using Carol Bacchi's "What's the Problem Represented to be?" (WPR) approach (Bacchi, 2009). The practical approach of the WPR discourse analysis will be explained in the parts that follow.

4.2 Research Method

The "What's the Problem Represented to be?" (WPR) approach, presented by Carol Bacchi (2009), encompasses seven interconnected forms of questioning and analysis. The approach consists of six questions, followed by a seventh step of analysis (Bacchi, 2009, p.2). The full list of questions can be found in Figure 2.

Figure 2: Full set of Bacchi's questions (Bacchi, 2009, p.2)

	Question
1	What's the problem of (stakeholder engagement) represented to be in a specific policy?
2	What deep-seated presuppositions or assumptions underlie this representation of the "problem"?
3	How did this representation of the "problem" come about?
4	What is left unproblematic in this problem representation? Where are the silences? Can the problem be thought about differently?
5	What effects are produced by this representation of the "problem"?
6	How/where has this representation of the "problem" been produced, disseminated and defended? How could it be questioned, disrupted and replaced?

Nevertheless, this study will only make use of two of the six questions to investigate the conceptualisation of stakeholder engagement; that is questions one and two, as can be found in Figure 2. These questions were chosen as they can probe into the Irish government's understanding of stakeholder engagement.

The first question asks what the problem is and what the subject of study is claimed to represent. The task is to discern what is proposed or recommended in the policy being examined and then work backwards from that to identify the problem representation(s) implicit within it. This problem representation serves as the foundation for the subsequent analysis (Bacchi, 2009, pp.2-4). Question one has been chosen due to its ability to discern the document's representation of stakeholder participation and to provide a foundation for the following analysis.

Question two suggests using Foucauldian archaeology, a technique proposed by Michel Foucault for historical investigation that looks at the underlying laws and frameworks that influence discourses and knowledge across time, to explore the underlying assumption and conceptual frameworks that make the identified problem representation intelligible (Bacchi, 2009, p.5). It references Foucault, who stated that critique does not involve simply stating that things are not good as they are, but rather examining the types of assumptions, familiar notions, and

unexamined ways of thinking that underlie accepted practices. The WPR approach questions unexamined forms of knowledge (ibid, pp.5-10). Question two has been chosen as it can probe a discussion on the underlying assumptions of the representation of stakeholders and opens up for an examination of why the Irish government conceptualises it the way that it does.

The final step, step seven, of Bacchi's (2009) approach emphasises the absolute significance of self-examination in research. The central idea is that every researcher is inherently situated within particular knowledge frameworks, which increases the probability of inadvertently adopting assumptions and preconceptions that warrant critical scrutiny. In contrast to reflexivity (or reflectivity), the notion of self-problematism calls upon the researcher to not merely distance themselves from their own values and perspectives, but to actively engage with and interrogate their own positions by applying the WPR questions to their own research proposals (Bacchi & Goodwin, 2016, p.24).

The research approach of the WPR framework resonates with diverse academic fields, as it emphasises the significance of knowledge and subject formation. WPR introduces a distinctive perspective by engaging with the concept of problematisation. It can be characterised as a problematisation-based approach, following the insight that "governing" is inherently a "problematizing activity" (Rose & Miller, 1992, p.181). As Osborne (1997, p.174) argues, "policy cannot be effectively implemented without first problematising its domain".

The conceptualisation of government or governing extends beyond conventional political institutions, encompassing the broader realms of societal administration and the maintenance of order. This broader focus is associated with the concept of "governmentality". In contemporary politics, "governmentality" refers to the mindset that permits social authorities to use their authority to control the public (Bacchi & Goodwin, 2016, pp.8-9). The analytical attention in this framework extends to both "the state" and the various other agencies, professionals, experts, and researchers (including the researchers themselves) involved in governing conduct and upholding order. These groups are perceived to exercise rule (governing) through the knowledge they produce (ibid).

Problematisation, based on the concept in Foucault's work and in current social theory, can be understood in two ways: as a mode of critical analysis that involves “thinking problematically” about something, and as a description of how things are rendered as objects of thought through specific forms of problematisation. The WPR approach has adopted both meanings of problematisation. It critically examines the problematisation present in policies and other proposals, examining the diverse agencies and knowledge involved in governing through the analysis of “practical” or “prescriptive” texts (Bacchi, 2009, p.xii; Bacchi, 2018, pp.7-9). The forms of problematisation themselves can provide valuable analytical insights, as they allow access to the underlying rationales and rationalities that inform specific governmental technologies. The concept of “technologies” is discussed as mechanisms through which governance occurs, including specific instruments (Riemann, 2023).

The WPR approach recognises that a selected text may contain multiple problem representations and that these representations can be “nested” within one another, requiring the application of the WPR questions multiple times (Bacchi, 2009, p.4).

4.3 Data Collection

The data that will be analysed was derived from the Irish government’s official website (GOV, n.d) which is a central portal for government services and information. The search field was delimited through three categories; firstly, the data was published by the Department of Housing, Local Government and Heritage (DHLGH). The sources were limited to those published by the DHLGH due to the department’s responsibility in preparing and publishing the finalised documents related to the RBMP. Secondly, the search category was narrowed down to “publications”, therefore excluding other types of distributions such as speeches, reports and campaigns. Thirdly, the search term “River Basin Management Plan 2022-2027” was used when searching for the publications.

Due to the timeframe given to conduct this study, the chosen data could be perceived as limited. The search “River Basin Management Plan 2022-2027”, “Publications” and “Department of Housing, Local Government and Heritage” yielded 57 results. The field was delimited by cross referencing the available publications with “stakeholder”/“stakeholder engagement”/“public

engagement”. Those that did not reference any of the key words were delimited from the study due to their irrelevance.

Due to the study’s magnitude and given timeframe, only three relevant papers published by the DHLGH were selected for use. Throughout the study, the sources will be referred to as document one, two, and three in accordance with the data presented in Figure 3.

Figure 3: Document selection

Sources	
Document one	<i>Draft River Basin Management Plan 2022-2027</i> (DHLGH, 2021a)
Document two	<i>Significant Water Management Issues: Public Consultation - Analysis of Submissions - Final Summary Report</i> (DHLGH, 2021b)
Document three	<i>Significant Water Management Issues in Ireland - Public Consultation Document</i> (DHLGH, 2019)

The first source, “*Draft River Basin Management Plan 2022-2027*” (DHLGH, 2021a) is the official draft published by the Government of Ireland in relation to the third cycle RBMP. The draft provides an introduction to Irish river management and previous RBMPs. It also summarises the current state of Irish waters. Furthermore, it provides the preliminary outline of the RBMP’s objectives and the parties involved in achieving them. The draft is used as the basis for the consultation period before the release of the final plan.

The second source, “*Significant Water Management Issues. Public Consultation - Analysis of Submissions - Final Summary Report*” (DHLGH, 2021b), analyses the 171 responses to the “Significant Water Management Issues Public Consultation”, which constitutes the second consultation phase of the RBMP performed during 2019-2020. The report then provided the material used to publish the “*Draft River Basin Management Plan 2022-2027* (DHLGH, 2021a)

The third source, “*Significant Water Management Issues in Ireland - Public Consultation Document*” (DHLGH, 2019) is the actual public consultation document used during the third

cycle RBMP. The document details some potential solutions to address what are deemed to be, by the Irish government, the key issues impacting Ireland's waters. The consultation also provides brief updates on the actions being taken as part of the second river basin planning cycle through 2021. The responses given by the public and stakeholders serve as the basis of the Final Summary Report.

4.4 Data Analysis

The material for the analysis was collected from the three documents provided by the Irish government⁷. The data was then read through and processed in a semi-systematic manner to find common themes corresponding to Bacchi's (2009) chosen questions⁸ which were then placed in a data matrix⁹. The semi-systematic manner allowed the evaluation to identify themes, theoretical viewpoints and other qualitative material linked to the topic rather than concentrating on quantitative data.

Firstly, each of the three documents were read independently without regard to the WPR questions. They were then reread, with question one, "*what's the problem of stakeholder engagement represented to be?*" in mind. A thematic coding procedure was then followed where each document was organised into different themes. After organising these themes in the data matrix, they were compared to each other to find overarching themes of the representation of stakeholder engagement. The same procedure was followed for question two, "*what deep-seated presuppositions or assumptions underlie this representation of the problem?*". Where the documents were, again, screened and thematically coded to then be compared in the data matrix.

Finally, Elinor Ostrom's (2015) framework of Governing the Commons was then applied. This allowed for a thorough analysis of the government's representation of stakeholders in relation to a well renowned theoretical framework. The application of Ostrom's paradigm provided a theoretical foundation for the findings from the data analysis.

⁷ The list of documents can be found in Figure 3.

⁸ Bacchi's (2009) questions can be found in Figure 2.

⁹ The data matrix can be found in the appendix.

4.5 Limitations

One notable limitation of the study is that the final RBMP has not yet been published (publication date not confirmed). All publications that are analysed are part of the draft versions of the plan. Although analysing the conceptualisation of stakeholder engagement within the drafts will give a clear indication of the Irish government's standpoint in the issue, there is still time for improvement amongst the government. Nevertheless, all documents published up to this point could be indicative of Ireland's lack of stakeholder engagement discourses within publications related to the RBMP. However, there is still time for improvement and the final RBMP draft may be more inclusive.

Although the WPR approach is effective in fostering a more profound comprehension of policy, it has some significant limitations. Firstly, the WPR method can be unduly interpretive, greatly depending on the analyst's viewpoint to understand policy texts. Due to this subjectivity, different people may understand the "problem" differently, which could skew the analysis based on the analyst's preconceptions or biases (Bletsas, 2012). Another limitation is that it makes the assumption that the policy-making process is rational and coherent, which may obscure the fact that ad hoc decisions and competing interests frequently result in policies (Carstensen, 2011). This might result in misunderstandings of the goals and effects of the policies, especially in situations of complicated or disjointed governance.

The sources that will be analysed in this study are all governmental sources. There are inherent limitations when using government sources for information collection, which must be taken into account. Publications, data, and reports from the government may overemphasise favourable results and minimise negative ones, giving a distorted picture of reality (Lee, 2013). Nevertheless, it should be noted that the application of other sources could benefit future research that aims to look at collective perceptions of stakeholder engagement in river basin management from a more holistic perspective. As this study aims to analyse the government's perception of the issue it is, however, not necessarily seen as a limitation to the study.

5. Analysis

The three documents have been read thoroughly, analysed, and thematically divided into sections and then put into a data matrix¹⁰. In the following sections, each document will be discussed based on the two chosen questions presented by the WPR approach to answer the question “*How does the third cycle of Ireland’s River Basin Management Plan conceptualise stakeholder engagement?*”. Each section will commence with a description of the findings from each theme and document. An analysis and discussion of the findings, utilising Elinor Ostrom’s theory of Governing the Commons will then follow.

5.1 “What’s the Problem of Stakeholder Engagement Represented to be?”

5.1.1 Essential for Success

All three documents represent stakeholder engagement as a vital aspect of water resources management. In the *Draft River Basin Management Plan 2022-2027* (DHLGH, 2021a), the issue of stakeholder participation is framed as the requirement for coordinated action and cooperation among many stakeholders in order to safeguard and improve Ireland’s water resources. It is stated that effective implementation of the water management techniques depends on stakeholder engagement. In order to attain the intended results, the plan emphasises how crucial it is to include local communities, governmental entities, and other stakeholders in the management and conservation of water resources.

Similarly, in the context of the second document, *Significant Water Management Issues - Public Consultation Submission - Final Summary Report* (DHLGH, 2021b), stakeholder engagement is seen as an essential element required to attain all-encompassing, successful and sustainable water management solutions that comply with the WFD. Stakeholder engagement is presented in the report not only as a procedural requirement but as a core component of the management strategy, essential for bringing a variety of viewpoints and local expertise to the planning process.

¹⁰ The full data matrix can be found in the appendix.

Document three, *Significant Water Management Issues in Ireland - Public Consultation Document* (DHLGH 2019), also represents stakeholder engagement as a central element to the development and implementation of water resources management plans. The premise of the problem is that better organised, knowledgeable, and inclusive engagement procedures are required since successful stakeholder engagement has not been entirely realised in prior river basin management cycles. It emphasises the intricate nature of water management that could not be adequately addressed by the previous levels of stakeholder engagement. This implies discrepancy between stakeholders' actual participation in decision-making processes and the prospective contributions. It is implied that greater involvement is not only advantageous but also required for water resources management strategies to be implemented successfully. The document states "*recognising that active public engagement in the first river basin planning process needed improvement, considerable effort and resources have been invested into improving the support for participation*" (DHLGH, 2019, p.22). This shows that input from stakeholders is actively sought after, acknowledging that previous attempts might not have involved them enough or taken advantage of their views.

Elinor Ostrom's concept of *Governing the Commons* emphasises the significance of collective-choice arrangements. Under these systems, decision-makers pertaining to the rules and regulations governing the use of shared resources include resource users. Collective choice arrangements guarantee the participation of individuals impacted by the rules in their formulation by enabling users to participate in their development and revision. By encouraging a sense of accountability and ownership, this involvement promotes more efficient and long-lasting resource management. According to Ostrom, these kinds of agreements are essential for settling disputes and encouraging collaboration among resource users (Ostrom, 2015, pp.92-94). The representation of stakeholders in all three documents, therefore, align with Ostrom's viewpoint. In the case of the documents, involving stakeholders and viewing them as essential for the sustainability of river basin management, is involving resource users and giving them an arena to participate in.

5.1.2 Multidimensional Collaboration

Documents one and two place heavy focus on multidimensional collaboration. In document one, *Draft River Basin Management Plan 2022-2027* (DHLGH, 2021a), it is emphasised that a multiple strategy encompassing many sectors and disciplines is necessary due to the complexity of water management concerns. Local government bodies, environmental organisations, businesses, the agriculture sector, and the general public are all included in this.

Similar to document one, *Significant Water Management Issues - Public Consultation Submission - Final Summary Report* (DHLGH, 2021b) highlights the importance of broad involvement from a range of stakeholders, such as local communities, NGOs, businesses and governmental organisations. The document refers to stakeholders as coming from “[...] a wide range of organisations and sectors” (DHLGH, 2021b, p.5). The document frames stakeholder engagement as crucial to obtaining information and suggestions that help determine the objectives and tactics of plans for sustainable water resources management. It emphasises the notion that stakeholder influence in environmental water governance has strategic significance.

Although document three, *Significant Water Management Issues in Ireland - Public Consultation Document* (DHLGH 2019), does not put as much emphasis on multidimensional participation as documents one and two, it still highlights how crucial it is to include a variety of stakeholders to guarantee the effectiveness and comprehensiveness of water resources management policies. The emphasis on inclusivity suggests that the scope of the consultation process in earlier plans may have been too narrow, perhaps ignoring important opinions from specific groups. According to the text, a variety of opinions is important to ensure that it is taken into account during the management planning process, not only in terms of numbers. The document states “*LAWPRO actively undertakes many activities to increase community education and awareness of water issues [...] 122 public meetings were held which generated over 1,000 submissions*” (DHLGH, 2019, p.22). This demonstrates the attempts to incorporate a greater variety of opinions throughout the consultation phase.

One of the main ideas in Elinor Ostrom’s paradigm for Governing the Commons is “nested enterprises”. This idea supports the division of common resource management into several

interrelated layers. Every layer, also known as a “nested enterprise”, manages governance at many levels, ranging from local to national. Because choices are made closer to the resource users and more appropriately customised to particular settings, this hierarchical approach enables the development of more effective and customised management techniques. Nested enterprises contribute to the overall sustainability and resilience of CPR management by ensuring coherence and coordination across several levels of governance through the interconnection of these layers (Ostrom, 2015, p.102). All three documents emphasise multidimensional participation measures, that include the engagement of stakeholders from various levels; such as local, regional and national, which aligns with Ostrom’s concept of nested enterprises.

5.1.3 Continued Engagement and Feedback

Stakeholder engagement is represented as a continuous process in all of the documents. Document one states that “*The draft measures are based on three principles that emerged during our review of the second cycle [...]; continuing opportunity for greater public participation and engagement of key stakeholders and sectors at a local and regional level in the ongoing management of catchments and water bodies*” (DHLGH, 2021a, p.3). The portrayal of stakeholder engagement emphasises how crucial it is to have continuing conversations and how stakeholder participation is iterative. It is viewed as an ongoing process that changes and adapts to new knowledge and evolving conditions rather than as a one-time conversation. The reference to previous cycles of RBMPs and their lack of stakeholder engagement supports the notion that the government portrays stakeholder engagement as an issue needing continued engagement and feedback.

In document three, the issue is presented in terms of the necessity of continuous commitment as opposed to sporadic or ad hoc involvement. This entails building enduring connections with stakeholders in order to involve them consistently over the course of various planning cycles for water resources management. There are descriptions of continuous involvement beyond one-time consultation events to address the continuing nature of engagement. This implied a process that is iterative, with input and past experiences guiding the evolution of stakeholder interaction. It is stated that improved methods are required to gather and incorporate stakeholder input into planning and policy. The document highlights an issue with the way feedback has been used in

the past and advises that it be consistently collected and used to modify and enhance management strategies. Processes for integrating feedback into planning are outlined in the document through statements such as “*Responses will inform the development of the third River Basin Management Plan for Ireland*” (DHLGH, 2019, p.4). This points to a process that aims to both request and impact stakeholder input in order to influence the results of water resources management plans.

Monitoring is a crucial aspect of Ostrom’s *Governing the Commons*. Traditionally, it entails routinely monitoring user behaviour and resource usage to make sure established guidelines are being followed. Good monitoring lessens the chance of resource depletion and misuse by assisting in the early detection of rule infractions. Users are more likely to trust and work together when there is accountability since they can see that everyone is following the rules. For CPRs to remain sustainable, proper enforcement together with regular monitoring are necessary. However, the monitoring not only covers the monitoring of resource usage, but also surrounding strategies, such as those involving stakeholder engagement (Ostrom, 2015, p.59). The documents suggest continuous observation and feedback systems, such as tracking the results of engagement strategies and public consultations to modify approaches as necessary, that enable the assessment of engagement efficacy and policy impact.

Ostrom also emphasises congruence between appropriation and provision rules and local conditions, which implies that local needs and conditions should be taken into account when creating regulations controlling the usage of shared resources (Ostrom, 2015, pp.30-33). The document’s acknowledgement of the failure of previous River Basin Management Plans to properly involve stakeholders and the need to gather stakeholder’s viewpoints correctly engage them in the policy-process aligns with Ostrom’s ideas.

5.1.4 Education

All of the documents emphasise the importance of educating stakeholders and the public on water related issues. In document one, educating stakeholders on the importance of sustainable water management and giving them the tools they need to participate actively in the process is presented as closely related to engaging stakeholders. This shows that the discourses believe that

knowledgeable stakeholders have a higher chance of favourably influencing the plan's goals to be met. The problem framing highlights the importance of stakeholder input in both the creation and implementation of policies. A democratic approach to environmental governance is reflected in the perception of stakeholders as co-creators of policy.

In document two, raising public and stakeholder awareness of water management concerns is seen as a major component of stakeholder engagement, with the goal of providing them with the information they need to make meaningful contributions according to the document. To ensure that stakeholders are knowledgeable and ready to participate meaningfully, the engagement process also entails disseminating information via a variety of media.

In document three, the issue is also presented in terms of the requirement for improved stakeholder education and information distribution. It is acknowledged that for stakeholders to engage in successful participation, they must possess sufficient knowledge. This entails making data accessible, promoting comprehension through education, and guaranteeing that everyone has the information required to make a significant contribution.

According to the concept of Governing the Commons, education is important for a number of reasons. Firstly, Ostrom's principle emphasises the importance of stakeholders' knowledge and participation in resource management rules (Ostrom, 2015, p.93). The documents aim to enhance stakeholder understanding and accessibility through education, enabling active participation in shaping common resource rules. Secondly, information dissemination and education supports Ostrom's principle of nested enterprises, enabling stakeholders to coordinate activities across different governance levels, contributing to coherent management strategies (ibid, pp.101-102). Thirdly, stakeholders' understanding of water management information enhances conflict resolution, enabling constructive dialogue and consensus-building in conflict-resolution processes (ibid, pp.100-101). The emphasis on education among all three documents, therefore, coordinates very well with Ostrom's ideas on how to ensure the longevity of CPRs.

5.2 “What Presupposition or Assumption Underlies this Representation of the Problem?”

5.2.1 Cooperation is Valuable

Although it is commonly agreed upon in literature that stakeholder engagement is valuable (Costanza et al. 2000; Hassenforder et al. 2015; Mostert, 2003; von Korff et al. 2010; Wagner et al. 2002), it can still be viewed as an underlying assumption. Throughout the *Draft River Basin Management Plan 2022-2027* (DHLGH, 2021a), collaborative procedures are viewed as to have intrinsic value and are seen as essential for efficient water resources management. The strategy is predicated on the idea that bringing together the knowledge and viewpoints of various stakeholders will improve decision-making and execution. The notion that more inclusive procedures produce more acceptable and lasting results serves as the foundation for the approach suggested in the draft. Statements in the draft suggest that cooperation is not only advantageous but also required, presuming that the success of the policy depends on stakeholder input and cooperative actions.

Similarly, document two, *Significant Water Management Issues - Public Consultation Submission - Final Summary Report* (DHLGH, 2021b), assumes that having a wide range of stakeholders involved will always result in more sustainable successful water management strategies. The document refers to diverse activities to engage stakeholders, and that this is necessary to achieve sustainable water management. This suggests that involving a broad range of stakeholders inevitably results in more effective policy-making, predicated on the notion that varied perspectives improve decision-making procedures.

Document three, *Significant Water Management Issues in Ireland - Public Consultation Document* (DHLGH 2019), further frames that it is a basic tenet of democratic government that stakeholder engagement is not only advantageous but also necessary. This assumes that more valid and successful policies result from inclusive decision-making procedures. Much of the justification for improving engagement techniques is based on the presumption that involving a wide range of stakeholders will improve environmental managerial outcomes.

Each document has the presumption that stakeholder engagement has intrinsic importance, as the discourse makes clear. The assumption is consistent with Ostrom's theory that efficient CPR management requires coordinated effort from a variety of stakeholders. Ostrom's paradigm emphasises how decision-making is improved when a range of stakeholders are involved, each providing a distinct set of knowledge (Ostrom, 2015, p.93). The claim made in the documents that cooperative processes are necessary for effective management of water resources reflects the framework of Governing the Commons.

The assumption that inclusive practices yield more enduring and acceptable outcomes is consistent with Ostrom's focus on collaborative decision-making. Ostrom maintained that people who are impacted by the rules ought to be involved in their revision (Ostrom, 2015, pp.93-94). Stakeholder engagement is assumed to result in more sustainable water resources management techniques in the documents. This presumption is consistent with Ostrom's discovery that group decision-making procedures improve the long-term viability and efficacy of CPR management.

5.2.2 Capability and Willingness

A common presumption among the documents is that stakeholders are capable and willing to participate in the decision-making process. Document one includes the basic presumption that stakeholders have the ability, including time, resources and knowledge, to actively participate in the process. It also assumes that stakeholders have the interest in doing so. This disregards possible differences in stakeholder capacity that can impair their capacity for productive engagement.

Document two also assumes that when given the chance, stakeholders are cooperative, reasonable, and eager to participate positively in the policy-making process. Throughout the document, it is implied that stakeholders are expected to participate in a reasonable and productive manner by descriptions of facilitated roundtable talks and feedback methods. However, it ignores possible conflicts of interests or opposition to scientific or policy directives because it assumes that stakeholders will contribute constructively given the correct knowledge and chance.

Document three makes the assumption that stakeholders can, and will, provide insightful comments and recommendations that will enhance water management plans once they are appropriately informed and involved. This ignored possible gaps in the expertise or experience of stakeholders, which could lower the calibre of their contributions. It also assumes that the relevant institutions are devoted to, and capable of providing meaningful responses to stakeholder input. This assumes an institutional adaptability and flexibility that is not always there.

Ostrom's paradigm emphasises the need for effective CPR management to consider the diverse capacities and resources of stakeholders, ensuring equal participation and promoting inclusive and flexible governance systems that accommodate different levels of interests and involvement (Ostrom, 2015, pp.205-206). Unlike Ostrom's framework, the documents simply assume that all stakeholders have the same capacity to partake in the decision-making process.

Document two assumes that all stakeholders will cooperate, ignoring potential conflicts. Ostrom's concept of collective-choice agreements emphasises the need for systems for establishing just regulations and conflict resolution (Ostrom, 2015, p.93). Roundtable discussions and feedback techniques align with Ostrom's focus on stakeholder bargaining and communication.

The third document overlooks possible areas of skill shortages while assuming stakeholders may offer insightful feedback once educated. Ostrom's paradigm emphasises the value of incorporating many forms of expertise and local knowledge (Ostrom, 2015, p.51). Acknowledging and filling up knowledge gaps among stakeholders through capacity-building and education programmes is essential to effective management. The text makes the assumption that institutions can and would meaningfully respond to stakeholder input - a requirement that Ostrom's framework would view as crucial to adaptive governance. Although, it is possible that institutional flexibility will not always hold true. According to Ostrom's ideas, institutions must be responsive and flexible, which calls for ongoing policy evaluation and modification in response to input from stakeholders (ibid, pp.52-54).

Ostrom highlights how important it is for governance structures to be flexible and able to grow with time (Ostrom, 2015, p.53). The changing character of managing commons is ignored by the presumption that stakeholders will always offer excellent advice and that institutions will always be adaptable. Sufficient governance necessitates ongoing education, flexibility, and the capacity to incorporate novel insights and viewpoints.

5.2.3 Achieving Consensus and Avoiding Conflict

Document one is predicated on the feasibility of logistical and strategic alignment across several sectors, such as urban planning and the agricultural sector. This could discount possible conflicts that could impede cooperative efforts, such as conflicting interests or priorities. Without addressing potential conflicts, the draft simply assumes the practicability of the strategy. The draft does not mention the possibility of irreconcilable differences amongst stakeholders that may prevent satisfactory consensus amongst all of the involved parties.

Similarly, document two shares the assumption that achieving sustainable water resources management is a goal that all stakeholders involved share. It ignores the potential for conflicts in policy creation due to different stakeholders' potentially conflicting interests, such as environmental conservation versus economic development.

Document two also heavily refers to the WFD and its legal compliance. This points to the assumption that all Irish stakeholders agree that following EU directives is the best course of action and that it is advantageous. Assuming a homogeneity of perspectives on regulatory measures, the document fails to take into account the possibility that national or local interests could clash with EU-wide directives and that consensus is not achievable.

Document three is predicated on the idea that involving stakeholders benefits the water resources management process and the stakeholder themselves. This may ignore situations in which the interests of stakeholders could collide with those of the environment or with one another. The document makes the assumption that consistent engagement will pay off in the long run, assuming that stakeholders stay interested and that their contributions will still be pertinent as the

situation evolves. It assumes that consensus will be achieved and that all potential conflicts are avoidable.

A key component of Ostrom's framework is the recognition of possible conflicts between stakeholders. It is challenging to assume that logistical and strategic alignment across industries, such as agricultural and urban planning, is possible without taking conflicts of interest into account. In order to properly handle these conflicts, the theory of Governing the Commons would contend that negotiating techniques and dispute resolution procedures must be included (Ostrom, 2015, pp.100-101).

Potential conflicts are ignored when it is assumed that all stakeholders have the same objective of sustainable water management. Ostrom's paradigm emphasises that comprehending and managing these disparate interests through collaborative methods is necessary for the effective control of CPRs (Ostrom, 2015, pp.100,179). Another area of concern is the over-reliance on the WFD and the presumption of unanimity in support for EU directives. The theory of Governing the Commons would stress the importance of polycentric governance (ibid, p.136), which takes into account and balances the interests of the local, national, and EU levels. For policies to be implemented effectively, local objections and priorities must be acknowledged and addressed.

The third document makes the assumption that having stakeholders involved will help the process and that their participation will always be fruitful. Ostrom's framework would draw attention to the possibility of stakeholder interests conflicting with one another or with environmental objectives. Mechanisms for handling these disputes and making sure that stakeholder participation is still beneficial must be part of effective governance (Ostrom, 2015, pp-100-101). The dynamic nature of CPR management is ignored by the presumption that stakeholders will continue to be engaged and that their contributions will be valuable over time. Ostrom highlights the requirement for flexible governance frameworks that can adjust to shifting circumstances and stakeholder demands. This covers ongoing education, feedback systems, and the capacity to modify plans in light of evolving facts and situations (ibid, p.52-54).

5.2.4 Education

All of the documents emphasise the importance of educating stakeholders and the public and water related issues. It is presumed that giving stakeholders knowledge and training on water management matters enables them to participate successfully. This assumes that knowledge scarcity, rather than potential obstacles like vested political and financial interests or cultural values, is the primary impediment to productive participation. The documents discuss subjects such as the consultation phases, which include efforts to educate stakeholders about water resources management issues before starting the phase of collecting their input. This suggests a view that the main obstacle to involvement is a lack of knowledge, and that educating stakeholders is necessary for their successful participation.

The documents reveal that ignorance is the primary obstacle to stakeholder engagement, indicating the need for capacity training. However, financial, political, and cultural norms can also impact involvement. Ostrom's theory suggests overcoming various challenges for effective CPR governance, including monetary and political interests, social, and cultural barriers (Ostrom, 2015, pp.24-25).

Nevertheless, Ostrom's ideas emphasise the importance of educating stakeholders to enable informed decision-making. Although, it is argued that education alone is insufficient. The framework emphasises power dynamics, fair resource access, and building social capital to create an empowered environment for stakeholders to engage and contribute effectively (Ostrom, 2015, p.186).

5.2.5 Equal Access to Participation

In all three documents, the engagement process is assumed to be, or to be capable of being, fair and equitable. Point in case, document three states that "*By responding, you will be helping to shape the overall management of the water environment*" (DHLGH, 2019, p.3). This suggests that the documents may not take into consideration power discrepancies or differences in access to resources since it implies that all stakeholders have equal access to participate and that their perspectives are equally heard and respected. It is implied by the initiatives that the process is transparent and that stakeholders have sufficient faith in it to engage in true and productive

participation. It ignores the possibility that some stakeholders may be sceptical or mistrustful of the true impact of their contributions.

The discourse highlights the assumption of a just and equal participation process. According to Ostrom's framework, it is critical to guarantee that every stakeholder has an equal opportunity to participate (Ostrom, 2015, p.186). This entails identifying and resolving power discrepancies and unequal access to resources that may hinder stakeholders' capacity for productive engagement. *Governing the Commons* highlights how important it is for decision-making processes to be inclusive (ibid, pp.93-94). The presumption that all parties involved have equal access to participation ignores any obstacles that certain parties might encounter, such as lack of social capital, resources, or expertise.

The presumption ignored disparities in power amongst stakeholders. According to Ostrom's beliefs, it is crucial to recognise and address these power disparities to guarantee equitable participation. Mechanisms to level the playing field and give less powerful stakeholders a voice must be part of effective governance. According to the concept of *Governing the Commons*, government systems have to help stakeholders who might not have the resources to take part completely. This can involve providing funding, supporting programmes aimed at increasing capacity, or making pertinent information easier to access (Ostrom, 2015, p.189).

5.2.6 Effectiveness of the Methods

All three documents are based on the same approach to involve stakeholders. The representation of the problem in all documents presupposes that the strategies suggested for involving stakeholders prove successful in pinpointing and executing fixes for problems related to water management. This assumes that the appropriate instruments, techniques, and plans are in place to convert stakeholder feedback into results that can be implemented and managed.

The documents make the assumption that stakeholder involvement tactics will be successful in identifying and resolving issues related to water management. Ostrom's theory emphasises the value of adaptation and iterative learning. Sufficient governance necessitates ongoing observation, assessment, and modification of tactics in response to results and input. The concept

of adaptive governance proposed by Ostrom emphasises the necessity of adaptability in management strategies (Ostrom, 2015, pp.52-54). The assumption that present approaches will work indefinitely without allowing for flexibility fails to recognise the dynamic character of resource management in CPRs.

The documents make the assumption that input from stakeholders can be easily transformed into outcomes that are manageable and actionable. Ostrom emphasises how crucial it is to have clear processes in place for incorporating stakeholder feedback into practice and policy. This entails creating precise procedures for prioritising tasks, incorporating feedback, and guaranteeing accountability. Continuous feedback loops where stakeholder input is not only received but also taken into consideration and revised are necessary for effective CPR management according to the theory of Governing the Commons (Ostrom, 2015, pp.20-21). The documentation must specify the procedures for handling, ranking, and putting into practice feedback.

6. Conclusion

This study has investigated the portrayal of stakeholder engagement surrounding Ireland's third cycle River Basin Management Plan (RBMP) with the aim of answering the question "*How does the third cycle of Ireland's River Basin Management Plan conceptualise stakeholder engagement?*". The research shed light on how the Irish government's policies interpret stakeholder involvement and its implications for sustainable water management by applying questions one and two from Carol Bacchi's "What's the Problem Represented to be?" (WPR) approach.

Stakeholder engagement is crucial to environmental governance, especially when it comes to managing common-pool resources (CPRs) like river basins, as the literature review made clear (CIS, 2003; Demetropoulou et al. 2010; de Stefano, 2010; Hassenforder et al. 2015; Ker-Rault & Jeffery, 2008; Luyet et. al., 2012; Mostert 2003; Mostert et al. 2007; Pahl-Wostl et al. 2008; von Korff et al. 2010). Researchers, such as Hassenforder et al. (2015) and Costanza et al. (2000), emphasised the advantages of participatory techniques, including better policy implementation, decreased conflict, and raised public awareness. The legal foundation for requiring public participation in water management plans was established by the European Water Framework

Directive (WFD) in 2000 (Hödl, 2018, p.331). By arguing that stakeholder input and group action are crucial for sustainable resource management, Ostrom's theory of Governing the Commons refuted conventional wisdom on CPR management (Ostrom, 2015, pp.1-2; 46).

The discourse analysis showed that the Irish government portrays stakeholder engagement as an essential aspect of river basin management. Collectively, all three documents' discourses portrayed the importance of continuous multidimensional collaboration and the need for proper feedback and education systems. The results highlight how well the Irish RBMP discourse adheres to Elinor Ostrom's Governing the Commons principles, especially regarding the importance of inclusive and participatory governance. The method taken by the RBMP to integrate multiple perspectives for sustainable water management is consistent with Ostrom's theory, which highlights the importance of stakeholders in collaborative decision-making. The results do, however, also point out important flaws and presumptions in the engagement tactics that are in use today. These include supposing that stakeholder aims are uniform and overestimating stakeholder ability while underestimating potential conflicts. As a result, this study adds to the larger discourse on environmental governance by providing insightful analysis and helpful suggestions for future resource and policy formulation.

Additionally, the analysis made clear how important it is to have an ongoing, flexible interaction process. The analysed documents provide a strong emphasis on continuous stakeholder education and feedback systems, which is consistent with Ostrom's support for dynamic and adaptable governance frameworks that may change to meet the requirements of stakeholders and adjust to changing conditions. In order to handle the complexity of managing water resources and guarantee the efficacy and durability of management plans, this iterative approach is essential.

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Appendice

1. European Water Framework Directive: Articles 5, 11, 13 and 14

Articles from the WFD (EC, 2000)

<p>Article 5</p>	<p>Characteristics of the river basin district, review of the environmental impact of human activity and economic analysis of water use</p> <ol style="list-style-type: none"> 1. Each Member State shall ensure that for each river basin district or for the portion of an international river basin district falling within its territory: <ul style="list-style-type: none"> - an analysis of its characteristics, - a review of the impact of human activity on the status of surface waters and on groundwater, and - an economic analysis of water use is undertaken according to the technical specifications set out in Annexes II and III and that it is completed at the latest four years after the date of entry into force of this Directive. 2. The analyses and reviews mentioned under paragraph 1 shall be reviewed, and if necessary updated at the latest 13 years after the date of entry into force of this Directive and every six years thereafter.
<p>Article 11</p>	<p>Programme of measures</p> <ol style="list-style-type: none"> 1. Each Member State shall ensure the establishment for each river basin district, or for the part of an international river basin district within its territory, of a programme of measures, taking account of the results of the analyses required under Article 5, in order to achieve the objectives established under Article 4. Such programmes of measures may make reference to measures following from legislation adopted at national level and covering the whole of the territory of a Member State. Where appropriate, a Member State may adopt measures applicable to all river basin districts and/or the portions of international river basin districts falling within its territory. 2. Each programme of measures shall include the "basic" measures specified in paragraph 3 and, where necessary, "supplementary" measures. 3. "Basic measures" are the minimum requirements to be complied with and shall consist of: <ul style="list-style-type: none"> (a) those measures required to implement Community legislation for the protection of water, including measures required under the legislation specified in Article 10 and in part A of Annex VI; (b) measures deemed appropriate for the purposes of Article 9; (c) measures to promote an efficient and sustainable water use in order to avoid compromising the achievement of the objectives specified in Article 4; (d) measures to meet the requirements of Article 7, including measures to safeguard water quality in order to reduce the level of purification treatment required for the production of drinking water;

(e) controls over the abstraction of fresh surface water and groundwater, and impoundment of fresh surface water, including a register or registers of water abstractions and a requirement of prior authorisation for abstraction and impoundment. These controls shall be periodically reviewed and, where necessary, updated. Member States can exempt from these controls, abstractions or impoundments which have no significant impact on water status;

(f) controls, including a requirement for prior authorisation of artificial recharge or augmentation of groundwater bodies. The water used may be derived from any surface water or groundwater, provided that the use of the source does not compromise the achievement of the environmental objectives established for the source or the recharged or augmented body of groundwater. These controls shall be periodically reviewed and, where necessary, updated;

(g) for point source discharges liable to cause pollution, a requirement for prior regulation, such as a prohibition on the entry of pollutants into water, or for prior authorisation, or registration based on general binding rules, laying down emission controls for the pollutants concerned, including controls in accordance with Articles 10 and 16. These controls shall be periodically reviewed and, where necessary, updated;

(h) for diffuse sources liable to cause pollution, measures to prevent or control the input of pollutants. Controls may take the form of a requirement for prior regulation, such as a prohibition on the entry of pollutants into water, prior authorisation or registration based on general binding rules where such a requirement is not otherwise provided for under Community legislation. These controls shall be periodically reviewed and, where necessary, updated;

(i) for any other significant adverse impacts on the status of water identified under Article 5 and Annex II, in particular measures to ensure that the hydromorphological conditions of the bodies of water are consistent with the achievement of the required ecological status or good ecological potential for bodies of water designated as artificial or heavily modified. Controls for this purpose may take the form of a requirement for prior authorisation or registration based on general binding rules where such a requirement is not otherwise provided for under Community legislation. Such controls shall be periodically reviewed and, where necessary, updated;

(j) a prohibition of direct discharges of pollutants into groundwater subject to the following provisions:

Member States may authorise reinjection into the same aquifer of water used for geothermal purposes.

They may also authorise, specifying the conditions for:

- injection of water containing substances resulting from the operations for exploration and extraction of hydrocarbons or mining activities, and injection of water for technical reasons, into geological formations from which hydrocarbons or other substances have been extracted or into geological formations which for natural reasons are permanently unsuitable for other purposes. Such injections shall not contain substances other than those resulting from the above operations,

- reinjection of pumped groundwater from mines and quarries or associated with the construction or maintenance of civil engineering works,

- injection of natural gas or liquefied petroleum gas (LPG) for storage purposes into geological formations which for natural reasons are permanently unsuitable for other purposes,

- injection of natural gas or liquefied petroleum gas (LPG) for storage purposes into other geological formations where there is an overriding need for security of gas supply, and where the injection is such as to prevent any present or future danger of deterioration in the quality of any receiving groundwater,

- construction, civil engineering and building works and similar activities on, or in the ground which come into contact with groundwater. For these purposes, Member States may determine that such activities are to be treated as having been authorised provided that they are conducted in accordance with general binding rules developed by the Member State in respect of such activities,

- discharges of small quantities of substances for scientific purposes for characterisation, protection or remediation of water bodies limited to the amount strictly necessary for the purposes concerned provided such discharges do not compromise the achievement of the environmental objectives established for that body of groundwater;

(k) in accordance with action taken pursuant to Article 16, measures to eliminate pollution of surface waters by those substances specified in the list of priority substances agreed pursuant to Article 16(2) and to progressively reduce pollution by other substances which would otherwise prevent Member States from achieving the objectives for the bodies of surface waters as set out in Article 4;

(l) any measures required to prevent significant losses of pollutants from technical installations, and to prevent and/or to reduce the impact of accidental pollution incidents for example as a result of floods, including through systems to detect or give warning of such events including, in the case of accidents which could not reasonably have been foreseen, all appropriate measures to reduce the risk to aquatic ecosystems.

4. "Supplementary" measures are those measures designed and implemented in addition to the basic measures, with the aim of achieving the objectives established pursuant to Article 4. Part B of Annex VI contains a non-exclusive list of such measures.

Member States may also adopt further supplementary measures in order to provide for additional protection or improvement of the waters covered by this Directive, including in implementation of the relevant international agreements referred to in Article 1.

5. Where monitoring or other data indicate that the objectives set under Article 4 for the body of water are unlikely to be achieved, the Member State shall ensure that:
- the causes of the possible failure are investigated,
 - relevant permits and authorisations are examined and reviewed as appropriate,
 - the monitoring programmes are reviewed and adjusted as appropriate, and
 - additional measures as may be necessary in order to achieve those objectives are established, including, as appropriate, the establishment of stricter environmental quality standards following the procedures laid down in Annex V.

Where those causes are the result of circumstances of natural cause or force majeure which

	<p>are exceptional and could not reasonably have been foreseen, in particular extreme floods and prolonged droughts, the Member State may determine that additional measures are not practicable, subject to Article 4(6).</p> <ol style="list-style-type: none"> 6. In implementing measures pursuant to paragraph 3, Member States shall take all appropriate steps not to increase pollution of marine waters. Without prejudice to existing legislation, the application of measures taken pursuant to paragraph 3 may on no account lead, either directly or indirectly to increased pollution of surface waters. This requirement shall not apply where it would result in increased pollution of the environment as a whole. 7. The programmes of measures shall be established at the latest nine years after the date of entry into force of this Directive and all the measures shall be made operational at the latest 12 years after that date. 8. The programmes of measures shall be reviewed, and if necessary updated at the latest 15 years after the date of entry into force of this Directive and every six years thereafter. Any new or revised measures established under an updated programme shall be made operational within three years of their establishment.
<p>Article 13</p>	<p>River Basin Management Plans</p> <ol style="list-style-type: none"> 1. Member States shall ensure that a river basin management plan is produced for each river basin district lying entirely within their territory. 2. In the case of an international river basin district falling entirely within the Community, Member States shall ensure coordination with the aim of producing a single international river basin management plan. Where such an international river basin management plan is not produced, Member States shall produce river basin management plans covering at least those parts of the international river basin district falling within their territory to achieve the objectives of this Directive. 3. In the case of an international river basin district extending beyond the boundaries of the Community, Member States shall endeavour to produce a single river basin management plan, and, where this is not possible, the plan shall at least cover the portion of the international river basin district lying within the territory of the Member State concerned. 4. The river basin management plan shall include the information detailed in Annex VII. 5. River basin management plans may be supplemented by the production of more detailed programmes and management plans for sub-basin, sector, issue, or water type, to deal with particular aspects of water management. Implementation of these measures shall not exempt Member States from any of their obligations under the rest of this Directive. 6. River basin management plans shall be published at the latest nine years after the date of entry into force of this Directive. 7. River basin management plans shall be reviewed and updated at the latest 15 years after the date of entry into force of this Directive and every six years thereafter.
<p>Article 14</p>	<p>Public information and consultation</p> <ol style="list-style-type: none"> 1. Member States shall encourage the active involvement of all interested parties in the implementation of this Directive, in particular in the production, review and updating

	<p>of the river basin management plans. Member States shall ensure that, for each river basin district, they publish and make available for comments to the public, including users:</p> <ul style="list-style-type: none">(a) a timetable and work programme for the production of the plan, including a statement of the consultation measures to be taken, at least three years before the beginning of the period to which the plan refers;(b) an interim overview of the significant water management issues identified in the river basin, at least two years before the beginning of the period to which the plan refers;(c) draft copies of the river basin management plan, at least one year before the beginning of the period to which the plan refers. On request, access shall be given to background documents and information used for the development of the draft river basin management plan. <ol style="list-style-type: none">2. Member States shall allow at least six months to comment in writing on those documents in order to allow active involvement and consultation.3. Paragraphs 1 and 2 shall apply equally to updated river basin management plans.
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2. Data Matrix: Question 1

Question 1: “What’s the problem of stakeholder engagement represented to be?”	
<p><i>Draft River Basin Management Plan 2022-2027 (DHLGH, 2021a)</i></p>	<p>Essential for Success</p> <ul style="list-style-type: none"> Without active engagement at all levels goals cannot be achieved.
	<p>Multidimensional Collaboration</p> <ul style="list-style-type: none"> Water management issues are complex. Multifaceted approaches/interdisciplinary nature. “<i>Collaboration between stakeholders and clear roles for implementation</i>”.
	<p>Continued Engagement and Feedback</p> <ul style="list-style-type: none"> Importance of ongoing dialogue/continuous process. Iterative nature. Adaptation to new information and changes. “<i>The draft measures are based on three principles that emerged during our review of the second cycle [...]: continuing opportunity for greater public participation and engagement of key stakeholders and sectors at a local and regional level in the ongoing management of catchments and water bodies</i>”.
	<p>Education</p> <ul style="list-style-type: none"> Educating stakeholders. Empowering stakeholders to actively engage in the process. Informed stakeholders are more likely to greatly contribute to achieving the plan’s objectives. “<i>This will drive a sense of collaboration and coordination to the benefit of everyone</i>”.
	<p>Inclusivity and Policy/Planning</p> <ul style="list-style-type: none"> Stakeholder engagement is crucial for the implementation and formulation of policies. Stakeholders as co-creators. Democratic approaches to environmental governance. “<i>We look forward to engaging in that process and to hearing the views of all those interested in protecting and enhancing our treasured natural water heritage</i>”.
	<p>Barriers</p> <ul style="list-style-type: none"> Acknowledges barriers. Although participation is necessary, there are barriers to effective stakeholder engagement. E.g. lack of awareness, interests, or resources. Text does not explicitly discuss barriers, however, the repeated emphasis on the need for engagement hints at challenges in achieving effective participation. “<i>However, this will be a difficult task and we cannot continue a ‘business-as-usual approach’</i>”.
	<p>Impact</p> <ul style="list-style-type: none"> Success in policies related to water resources management is heavily dependent on stakeholder engagement. “<i>Everyone needs healthy and well protected water catchments. This will encourage collaboration and coordination</i>”.
<p><i>Significant Water Management</i></p>	<p>Inclusive participation</p> <ul style="list-style-type: none"> Need for wide-ranging participation (e.g local communities/authorities, NGOs,

<p><i>Issues. Public Consultation - Submission - Final Summary Report (DHLGH, 2021b)</i></p>	<p>industry groups.</p> <ul style="list-style-type: none"> ● “Key stakeholders from a wide range of organisations and sectors” (p.5).
	<p>Legal requirements</p> <ul style="list-style-type: none"> ● Compliance with the WFD. ● Stakeholder engagement is framed as a response to the WFD. ● Stakeholder engagement is not only necessary, but legally required.
	<p>Education</p> <ul style="list-style-type: none"> ● Stakeholder engagement is centred around educating the public/stakeholders ● Disseminating information.
	<p>Feedback</p> <ul style="list-style-type: none"> ● Feedback from stakeholders is represented as a critical component of sustainable water management. ● Stakeholder engagement is not only important so that the public’s opinions can be gathered, but also to provoke concrete outcomes to influence policy decisions and its implementation. ● <i>“The responses received help to shape the overall management of the water environment, influencing the content of the draft plan that is now published for consultation”.</i>
<p><i>Significant Water Management Issues in Ireland - Public Consultation Document (DHLGH 2019b)</i></p>	<p>Enhanced participation</p> <ul style="list-style-type: none"> ● Previous levels of stakeholder engagement were insufficient for the complexity of water resources management challenges. ● Gap between potential contributions of stakeholders and their actual involvement. ● Better stakeholder engagement is necessary for successful implementation. ● <i>“In seeking your views on the significant water management issues and their potential solutions, we have set out a number of specific questions in relation to each of the challenges outlined in Part 4 of this document”.</i>
	<p>Structural improvements</p> <ul style="list-style-type: none"> ● Need to structurally improve how stakeholders are engaged. ● Need for better frameworks/platforms. ● LAWCO, LAWPRO, An Fóram Uisce.
	<p>Education</p> <ul style="list-style-type: none"> ● Stakeholder engagement is centred around educating the public/stakeholders ● Disseminating information. ● <i>“Information on catchment management is also provided through the EPA’s catchments.ie website and the water and communities website”</i>
	<p>Inclusivity</p> <ul style="list-style-type: none"> ● Need for wide-ranging participation ● Engagement process in previous plans might have been too limited in scope, excluding valuable perspectives from certain groups. ● <i>“LAWPRO actively undertakes many activities to increase community education and awareness of water issues [...] 122 public meetings were held which generated over 1,000 submissions.” This illustrates efforts to include a wider range of voices in the consultation process”</i>
	<p>Feedback</p> <ul style="list-style-type: none"> ● Feedback from stakeholders is represented as a critical component of sustainable water management. ● Stakeholder engagement is not only important so that the public’s opinions can be

	<p>gathered, but also to provoke concrete outcomes to influence policy decisions and its implementation.</p> <ul style="list-style-type: none"> ● <i>“Responses will inform the development of the third River Basin Management Plan for Ireland”.</i>
	<p>Long-term participation</p> <ul style="list-style-type: none"> ● Sustainable engagement rather than episodic/ad hoc. ● Continuously involving stakeholders throughout the different cycles. ● <i>“This pilot project will be evaluated and will inform future community engagement initiatives”.</i>

3. Data Matrix: Question 2

Question 2: “What deep-seated presuppositions or assumptions underlie this representation of the ‘problem’?”	
<p><i>Draft River Basin Management Plan 2022-2027 (DHLGH, 2021a)</i></p>	<p>Cooperation is valuable</p> <ul style="list-style-type: none"> ● Inherent value in collaborative processes and that it is necessary for water resources management. ● “<i>Collaboration between stakeholders and clear roles for implementation</i>”. ● The draft simply assumes that there is value in cooperation.
	<p>Capacity/willingness among stakeholders</p> <ul style="list-style-type: none"> ● Stakeholders want to engage. ● Stakeholders have the capacity to engage. ● “<i>We look forward to engaging in that process and to hearing the view of all those interested in protecting and enhancing our treasures natural water heritage</i>”.
	<p>Consensus is achievable</p> <ul style="list-style-type: none"> ● Multi-sectoral coordination can effectively address complex environmental challenges. ● Consensus is achievable without conflict. ● No competing interests or disagreements of priorities. ● Does not discuss irreconcilable differences between stakeholders that may prevent a satisfactory consensus among all parties.
	<p>Sustainability of the outcomes</p> <ul style="list-style-type: none"> ● The draft assumes that the outcomes achieved from stakeholder engagement are automatically sustainable. ● Broad consensus leads to long term results. ● “<i>The new management regime will deliver multiple benefits for water, nature and biodiversity, and climate mitigation and adaptation</i>” (p.61)
<p><i>Significant Water Management Issues. Public Consultation - Submission - Final Summary Report (DHLGH, 2021b)</i></p>	<p>Cooperation is valuable</p> <ul style="list-style-type: none"> ● The inclusion of multiple stakeholders will naturally lead to more effective/sustainable water resources management practises. ● “<i>Key stakeholders from a wide range of organisations and sectors</i>”
	<p>Rational of stakeholders</p> <ul style="list-style-type: none"> ● The document assumes that stakeholders are rational, cooperative and willing to engage in the process. ● Overlooks potential conflicts of interest or resistance to scientific/policy directives. ● Implied via descriptions of feedback channels and organised roundtable talks that rational and constructive engagement from stakeholders is expected.
	<p>Education</p> <ul style="list-style-type: none"> ● Assumes that providing education to stakeholders about water resources management issues empowers them. ● Assumes that lack of information, rather than other potential obstacles (e.g financial/political objectives, cultural beliefs) is the primary impediment to effective engagement.
	<p>Shared values</p> <ul style="list-style-type: none"> ● The document assumes that all stakeholders share sustainable water resources

	<p>management as a common goal.</p> <ul style="list-style-type: none"> • Overlooks differing priorities among stakeholders (and therefore potential conflicts)
<p><i>Significant Water Management Issues in Ireland - Public Consultation Document (DHLGH 2019b)</i></p>	<p>Compliance with the WFD as beneficial</p> <ul style="list-style-type: none"> • All stakeholders agree that complying with the WFD is the best approach. • Obliterates potential for local or national priorities to conflict with the WFD and other European directives.
	<p>Cooperation is valuable/beneficial</p> <ul style="list-style-type: none"> • Including a diverse range of stakeholders lead to more legitimate and effective water resources management policies. • Assumes a direct link between stakeholder input and sustainable water management policies. • Assumes that stakeholder engagement is mutually beneficial for stakeholders and the water management process.
	<p>Capability</p> <ul style="list-style-type: none"> • Assumption that stakeholders have the capacity to contribute to the RBMP
	<p>Effectiveness of methods</p> <ul style="list-style-type: none"> • Assumes that the methods proposed for engaging stakeholders are effective. • Assumes that the right tools, methods, and strategies are in place to translate stakeholder input into actionable outcomes.
	<p>Process integrity</p> <ul style="list-style-type: none"> • Assumes that the engagement process is fair and that all stakeholders have equal access to participate. • Discounts power imbalances and/or disparities in access to resources. • Assumes that the process is transparent - overlooks potential distrust/scepticism.