Sam Keenan

From: Trimathboy Anglers <trimathboyanglers@gmail.com>

Sent: Saturday 17 January 2026 10:37
To: Joint Committee on Justice Home Affairs and Migration
Cc: Peadar Tóibín; Johnny Guirke; Aisling Dempsey
Subject: Pre-Legislative Scrutiny of the Civil Reform Bill 2026 – Trim Athboy & District Angling Association

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Attn: To: Alan Guidon, Clerk of the Joint Committee on Justice, Home Affairs and Migration,

I am writing to you on behalf of the **Trim Athboy and District Angling Association**, representing 240 members who serve as voluntary guardians of the River Boyne and its tributaries. We wish to express our grave concern regarding the **Civil Reform Bill 2026** and the associated **Scale of Fees** proposed under Section 294 of the Planning and Development Act 2024.

While we understand the Government's desire to streamline major infrastructure projects like Dublin Airport, the current legislative path creates significant "collateral damage" for local community groups like ours.

Specifically, we wish to highlight three critical issues:

1. The "Scientific Research" Gap: Environmental protection is not just a legal matter; it is a scientific one. To prove a breach of the Habitats Directive or a pollution incident, our club must hire independent hydrologists and biologists. These fees often reach between €10,000 and €30,000. The proposed "Scale of Fees" focuses almost exclusively on legal professional fees (Solicitors/Counsel). If scientific research costs are not fully recoverable, a local club could win a case in the public interest but still be bankrupted by the cost of the evidence required to prove it.

2. The Impact of the "Harm" Test (Head 8): The new requirement for an applicant to prove "harm or prejudice" to gain standing creates a catch-22. To prove harm to a river, you need the very scientific data that the State is now making it financially impossible to fund. This effectively creates a "Polluter's Charter" where local clubs are priced out of defending their own waterways.

3. The Aarhus Convention Obligations: Ireland is a signatory to the Aarhus Convention, which mandates that environmental justice must not be "prohibitively expensive." Forcing

a volunteer-led association of 240 people to risk tens of thousands of euros in unrecoverable research fees is the definition of prohibitively expensive.

Our Request to the Committee: We ask that the Committee ensures the final Bill and any secondary legislation regarding the Scale of Fees includes a **mandatory provision for the full recovery of scientific expert witness fees and laboratory research costs** for non-profit community groups in environmental cases.

We also request that the Committee recognizes the distinction between "strategic objectors" and local community guardians who have been protecting Irish natural assets for over 80 years.

Yours sincerely,

Paul French

Hon. Chairman - Trim Athboy & District Angling Association - Est. 1943

Website: https://www.trimathboyanglers.net/