



**SUBMISSION TO THE COMMISSION FOR REGULATION OF
UTILITIES ON**

Irish Water Performance Assessment Framework

17th November 2020

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Introduction to An Fóram Uisce

An Fóram Uisce | The Water Forum was established in June 2018 in accordance with the provisions of Part 5 of the Water Services Act 2017. An Fóram Uisce is the only statutory body representative of all stakeholders with an interest in the quality of Ireland's water bodies. An Fóram Uisce consists of 26 members including representatives from a wide range of organisations with direct connections to issues relating to water quality and public water consumers. Approximately 50 different organisations were involved in the nomination of members.

An Fóram Uisce's main concern in relation to the provision of drinking water is that the citizens and businesses of Ireland should have access to safe, potable drinking water supplies and in relation to waste water, that all services are provided and maintained in a manner that safeguards public health and environmental well-being. The cost of access to both services, and their on-going service provision, should be based on an economically reasonable, equitable, fair and transparent basis.

One of the functions of An Fóram Uisce outlined in the Water Services Act 2017 is to **advise and provide observations to the Commission for Regulations of Utilities (CRU):**

- i. **in relation to the performance by Irish Water of its functions, and**
- ii. **when requested in writing in that behalf by the Commission, on any consultation document prepared by the Commission in respect of water services provided by Irish Water.**

Submission to CRU on Irish Water Performance Assessment Framework (PAF)

An Fóram Uisce welcomes the CRU review of Irish Water's Performance Assessment Framework and the new targets set for Irish Water's expected delivery for the Revenue Control 3 period 2020 to 2024. An Fóram Uisce is pleased to have the opportunity to submit a response to the CRU's proposed approach to setting the targets and on the changes to the metrics by which the CRU will monitor Irish Water's performance in delivering on its obligations.

An Fóram Uisce would like to thank the CRU for presenting to the members on the objectives of the review of the PAF and on the proposed changes to performance assessment categories and reviewing metrics. Considering that Irish Water receive a budget of €8 billion Euro to support its provision of water supply and wastewater services over the RC3 period (2020-2024), it is important that performance targets are ambitious, yet informed and achievable.

To this end, An Fóram Uisce is pleased that the CRU propose targets informed by the:

- requirements laid out in the Domestic and Non-Domestic Customer Handbooks
- the targets and performance of other utilities monitored by the CRU, and
- targets and performance by other water companies in neighbouring jurisdictions.

Performance areas addressed in the PAF

An Fóram Uisce considers the proposed six assessment areas will provide for adequate performance monitoring and reporting on the basis that clear targets are set and communicated.

- Customer service
- Security of Water Supply
- Quality of Water Supply
- Environmental performance
- Sewage service
- Energy and Emissions

An Fóram Uisce considers the consultation has included all the relevant performance indicators but would also like the CRU to consider a 'value for money' metric as this would allow for greater transparency on capital investment programmes and operational costs. Such a metric provides potential opportunities to educate the consumer on the costs of providing water and wastewater services in a real and tangible way and it would allay fears and accusations of inefficiencies in service delivery. Providing such transparency would reassure the public that IW is maturing and rising to the challenges that are required of it.

CUSTOMER SERVICE

Telephone communications

CRU proposes that the speed of call response achieved by Irish Water should be similar to that of other utilities, this will ensure that Irish Water continues to improve its service and also gives the CRU a comparator for measuring Irish Water's performance.

The CRU has set call abandonment rates and first call resolutions targets to reflect those achieved in other jurisdictions and An Fóram Uisce agrees with this proposal. The 90% call resolution at first call for all types of calls is an appropriate target for Irish Water. This and a call abandonment rate of 1% will require continued and significant improvements particularly for operations queries however this will help build consumer trust in the utility and will ensure operation efficiencies.

Billing

An Fóram Uisce recommends that the CRU monitors: (a) the number of bills (statements of usage or accounts) issued by IW based on a meter reading as a percentage of bills (statements of usage or accounts) issued on metered accounts and;

(b) the number of metered accounts that receive at least one bill (statement of usage) based on a meter read in a year (as per the Customer handbook requirements).

An Fóram Uisce accepts the proposed targets of 70 % for (a) and 100% for (b) is appropriate for this funding period. It is important that all customers get a bill (statement of usage) based on a meter reading at least once in a year, at a minimum, but the aim should be that all bills (statements of usage) are based on meter readings. This is to ensure that customers are aware of their water usage for conservation reasons, to identify leaks, and also to protect against bill shock. An Fóram Uisce considers it important for customers to have an awareness of how their usage compares with desired conservation targets, and statements of usage should also contain information on how water savings targets can be achieved. Having accurate readings will also assist Irish Water in developing a database on daily and seasonal demand needs as well as regional supply requirements. Such information should assist planning for efficient service provision and has the potential to inform strategic measures that could be taken to mitigate periods of stressed supply or peak demand.

Response to Billing Contacts

An Fóram Uisce agrees that customers with a bill query should be dealt with within 5 working days. Billing queries are likely to increase significantly when the new Tariff Framework is implemented, therefore An Fóram Uisce agrees with the gradual increase in this target, beginning with IW current response rate, with a targeted improvement of 1% annually to 2024, which will bring IW in line with other comparator utilities. It also seems reasonable that IW would also provide a timely response to domestic customers with queries around Excess Use Charges.

Response to Complaints

An Fóram Uisce supports a response to complaints metrics that reflects those in the Domestic and Non-Domestic customer handbooks. As the metrics for resolution are set out in the Customer Handbooks it is important that targets should be set at 100% achievements on each, Irish Water are already achieving nearly 98% currently so the 100% target should be achievable for the 5-day response. Providing a decision within 2 months to 100% complaints is also reasonable as it is in line with that outlined in the Handbook although it will require a greater level of ambition from Irish Water.

Unresolved complaints raised to CRU, monitoring of these is important to further assess IW performance in complaint handling and the CRU investigations will also have the potential to identify weaknesses in IW systems and will therefore, be in a position, to advise on improvements. It also gives customers with particularly difficult or complex issues an access to resolution. Setting targets in line with other utilities would also seem appropriate.

Customer Satisfaction Survey,

An Fóram Uisce agrees that proper research techniques should be employed, so it is important to ensure a representative sample is taken and that there is random selection of contributors. It would also seem appropriate that the survey would be administered in a variety of formats (not just telephone) that better reflects the customer engagement medium.

An Fóram Uisce would encourage the CRU to engage with Irish Water (IW) and the research company to set questions that can provide a consistent database of customer satisfaction and longitudinal changes therein. Setting more ambitious Customer Satisfaction Survey targets seems appropriate particularly as these new targets are incremental and in line with similar utilities in the UK.

SECURITY OF WATER SUPPLY

Security of water supply

An Fóram Uisce recognises it is difficult to be definitive about this metric before the National Water Resources Plan is in place as the plan will determine Irish Water's resource management plans for the next 25 years.

In the interim, reporting the total number of supply zones that are in deficit for security of supply and the percentage of the population served by these zones, seems the clearest approach. However, it would be important to know which zones are under stress and the consultation information provided does not make clear if this information would be available. Knowing the size of the deficit in each resource zone would also be beneficial as it has the potential to encourage adherence to conservation and demand reduction measures. An Fóram would encourage as much transparency as possible around vulnerabilities in security of supply as it helps dispute the assumption that Ireland is a water-rich country, because in many parts of the country at certain times of the year there are and will remain considerable water supply vulnerabilities.

National headroom targets should be set and applied to each water resource supply zone to ensure a secure supply and provide greater resilience within the system to address excess demand and periods of reduced supply and also future impacts of demographic change and climate change.

An Fóram Uisce would like to take this opportunity to reiterate its concern about the vulnerability of water supply to the Greater Dublin area. Relying so heavily on the River Liffey as the primary source of Dublin's water supply, providing all the water to the Poulaphuca and Leixlip water treatment plants is a great risk. Accounting for 85% of Dublin's water, the Liffey is a critical artery supporting all aspects of life in the capital city. A disruption to this source

could have potentially catastrophic effects on the city and the need to spread risk to at least one other major source is paramount. The ongoing delay in the development of the Eastern Midlands Water Supply Project or alternative plans to deal with this threat is not acceptable.

Added to this concern is the fact that the main Greater Dublin area treatment plants are at, or close to, maximum capacity and so there is very little buoyancy to cope with peak demand or a situation where one of the plants is taken out of operation, something that was abundantly clear in late 2019 with a boil water notice affecting 600,000 people because of failures at Leixlip treatment plant.

Water demand is a component of the system that a water utility can manage. Irish Water indicates that demand management will be a key part of the National Water Resources Plan but this plan is also experiencing delays in delivery and will need to go through a protracted consultation period, further delaying progress on these issues.

Leakage

The proposed leakage metrics is considered appropriate and the re-categorisation of the ‘unaccounted-for-water’ seems sensible. Considering IW has, now, more robust knowledge of where water is being lost as leakage and more information on unaccounted-for water, An Fóram Uisce is concerned at the lack of urgency in addressing these problems and that leakage and unaccounted-for-water remains at unacceptable levels. Up to 40% leakage and unaccounted-for water losses on the system carries a very heavy cost burden not only financially but also for security of supply and headroom. To this end, An Fóram Uisce would like IW to consider the Pareto Principle that states 80% of the consequence comes from 20% of the causes and if IW could identify and remediate that 20% large gains could potentially be achieved.

For leakage targets within the PAF, An Fóram Uisce accepts the CRUs approach on glide path 1 which gives IW the opportunity to identify ‘low hanging fruit’ for improvements as this takes advantage of early cost reductions and will be important for the public’s perception of the work of the utility.

A straight-line target for reductions of leakage on the customer side seems also appropriate and An Fóram Uisce would support these targets and methodology as well. It also should be stated that leakage remains high even after the implementation of these targets.

An Fóram Uisce would recommend that all technologies and innovations and International best practice be sought and applied, Scottish Water for example made significant progress in leakage reduction in a relatively short time without relying exclusively on infrastructure renewal.

QUALITY OF WATER SUPPLY

Unplanned interruptions

The definition of unplanned interruptions to supply appears reasonable and appropriate. The new metric of 'minutes lost per customer supply interruptions greater than 3 hours in duration' also seems an efficient metric to use as it has worked in other jurisdictions and seems a reasonable way to measure the inconvenience caused.

An Fóram Uisce considers it appropriate to set targets for IW for unplanned interruptions of more than 12 and 24 hours. IW's current performance is significantly worse (24% of connected properties impacted by unplanned interruptions) than comparable utilities (<1%) so targets should be set to allow IW to improve its performance over the RC period. Trying to achieve similar targets to Northern Ireland Water and Scottish Water might be ambitious but it should be possible to set and achieve these targets once the new National Water Resources Plan (NWRP) is in place.

Drinking water Quality

The five metrics monitored by the CRU for compliance with drinking water parameters are considered to represent a minimum for water quality. An Fóram Uisce welcomes the CRU proposed 99.9% target for microbiological compliance by 2024. The increased chemical compliance to 99.9% by 2024 will require significant lead and trihalomethane improvements.

Considering that the recast Drinking Water Directive (DWD) although not in play yet, the text is available and the implications within should be included in this PAF. A working group has been established to bring agencies together to transpose the DWD into Irish Legislation and it is important that any measures therein are compliant with the requirements of the WFD and the new River Basin Management Plan (RBMP).

Boil Water notices and Drinking water restriction notices

It is important that the CRU continue to monitor these notices, the number of notices issued, the time period of the notice and the number of customers that they impact upon. The 30-day timeframe is a long time for customers to be inconvenienced but it would give Irish Water enough time to resolve issues. IW do not have a remit to address wider catchment issues so it would be beneficial for them to foster working relationships with local authorities, LAWPRO and other agencies to ensure co-operation and an integrated approach at catchment level.

A target of no homes or businesses being impacted by boil water notice or drinking water restriction notices for more than 30 days by the end of 2021 accommodates IW planned work

programme for improvements. An Fóram Uisce agrees with the further target of zero long-term boil water notices or drinking water restrictions by 2024.

ENVIRONMENTAL PERFORMANCE

Pollution incidents

Sewer incidents overloads

Sewer Incidents overloads such as those that happen in heavy rainfall or floods are very distressing to customers and the environment and it is important that they are kept to a minimum. It is disappointing to note that IW is not in a position to agree targets with the CRU on this measure, particularly as sewer incidents have the potential to impact on water quality and human health. Setting a baseline in 2021 and staged targets, will give IW time to assess the situation and develop baseline targets. Moving towards targets similar to NI and Scottish standards by 2024 would seem appropriate.

Sewer incidents (other causes)

Other sewer incidents occur by blockages, misconnections or other failures. It is fair to allow IW time to develop its baseline by 2022 but it is also important that targets should be set in line with comparable utilities by 2024 with ongoing annual reviews.

More work needs to be done by IW to monitor storm water overflows and provide transparent reporting of frequency of events, duration of events and volumes released per event and awareness programmes on waste connections/misconnections and sustainable urban drainage should be initiated, possibly similar to one carried out by the Rivers Trust in the UK on misconnections. <https://www.theriverstrust.org/2019/07/18/drain-misconnections/>

Sewer incidents at-risk property register

The IW National Sewer Flooding Register should help inform actions that needs to be undertaken to protect and reduce the numbers of properties at-risk from sewer incidents. The CRU should monitor this and set targets in due course to ensure that IW reduce the numbers of at-risk properties going forward.

Pollution incidents relating to wastewater

CRU monitors two metrics relating to wastewater incidents. The first looks at the number of incidents resulting from wastewater collection and treatment activities, broken down by

category and, the second looks at the number of recurring incidents. The EPA classifies incidents as:

- a. any discharge that does not comply with the discharge licence or
- b. any occurrence at a wastewater works that has the potential to cause contamination or require an emergency response

Incidents are categorised from 1 (minor) to 5 (catastrophic). The fact that the EPA WWT report 2018, stated 18% of recurring incidents and 52% of one-off incidents do not require infrastructure upgrades means that changes in management and operation practice must be expedited to ensure that such incidents do not recur. An Fóram Uisce agrees that IW should target zero incidents relating to operation and management of plants.

Because of the negative impacts of wastewater pollution incidents, it is important that IW aim to meet the CRU target of halving the number of incidents by the end of RC3. That is less than 354 one-off incidents and < 98 recurring incidents in category 1-2 with zero incidents in categories 3-5 considered serious incidents.

Agglomerations Meeting Wastewater Treatment Requirements

There are agglomerations or economic activities that are sufficiently large to require wastewater collection and treatment. There are two sub-categories:

1. Agglomerations with no wastewater treatment or only preliminary treatment
2. Agglomerations not compliant with effluent quality standards under the UWWTD

Depending on the size of the agglomeration the EPA issue a wastewater discharge licence to IW or a Certificate of authorisation to ensure the treated effluent does not negatively impact the environment.

To monitor these discharges the CRU is proposing a new metric:

Compliance with the Emission Limit Values for Urban Wastewater Licences

1. AGGLOMERATIONS with no wastewater treatment are to be assessed through the Investment plan only and in 2019 there were 39 agglomerations with no or only preliminary wastewater treatment. It is considered by the CRU that this metric does not represent an enduring performance commitment, that is once the infrastructure is in place the metric is no longer active, therefore the CRU is proposing to monitor delivery through the Investment plan.

In [2018](#) 36 and in [2019](#) 35 agglomerations (serving over 78,000 person equivalent population) pumping raw sewage into the environment that is agglomerations with no wastewater treatment facilities. As noted earlier in this submission, Fóram Uisce cannot state strongly enough that urgent action is needed to address wastewater issues.

As result of the large number of closures of bathing water sites this summer, An Fóram Uisce carried out an investigation into bathing water closures during 2020 and the reasons given for these¹. Five bathing waters sites were closed for the whole season and 4 of these were because of wastewater discharges or poor network conditions resulting in overflows; Merrion Strand, Portrane, the Brook, Ballyloughnane and Clifden beaches. Similar results are evident for 12 temporary closures of bathing waters with 9 of these resulting from poor network condition and misconnections that resulted in stormwater overflows or sewage discharges (Internal An Fóram Uisce report¹). This is therefore a public health issue and needs to be addressed with utmost priority.

An Fóram Uisce recognises that IW has inherited a utility with significant infrastructure deficits and that enormous amounts of expertise and capital investment is required to make the utility fit for purpose. An Fóram would recommend that all effort is made to resource IW appropriately to deliver on its infrastructural and operational objectives.

However, what is not measured is not counted and An Fóram believes it is important that wastewater discharges from small agglomerations are also monitored and recorded to ensure there is no negative environmental impacts. The evidence from the research on bathing waters show that regular year-round monitoring is lacking and without evidence of a problem it cannot be fixed.

2. Agglomerations not compliant with effluent quality standards under the UWWTD

As mentioned above not all agglomerations are included in the requirements of the UWWTD, as their inclusion depends on agglomeration size and receiving water body characteristics. The new metric proposed by the CRU for Agglomerations not compliant with effluent quality standards under the UWWTD *Compliance with the Emission Limit Values for Urban Wastewater Licences* will be addressed in the following paragraphs.

¹ An Fóram Uisce Internal Report 'An overview of beach and bathing water closures in Ireland – summer 2020'
A Alamanos, A Rolston & S Linnane

ENVIRONMENTAL PERFORMANCE (continued)

Compliance with the treatment requirements in the UWWTD

The Urban Waste Water Treatment Directive sets requirements for the collection and treatment of wastewater from *large* urban areas to protect the environment. The UWWTD sets quality limits that the treated wastewater must meet depending on the size of the urban area and the type of water body the treated wastewater is discharged to. The number of agglomerations that are subject to the requirements of the Directive can change from year-to-year because of changes to wastewater loads or the classification of water bodies.

As reported in 2018 EPA WWT report, 66% of the recurring incidents at plants were caused by a lack of treatment capacity at the plant and indicate the need for further upgrades and investment. Of the 173 agglomerations falling under this Directive, 154 are compliant with 19 agglomerations failing to reach the required targets in 2019, these failing agglomerations represents 56% of the national population equivalent. An Fóram Uisce agrees with the CRU proposal to require IW to be 100% compliant with the UWWTD by 2024.

An Fóram Uisce has stated on many occasions that IW have not attended to wastewater infrastructure upgrades with the required urgency, which means that Ireland is failing to meet UWWTD targets and RBMP objectives. Making sure treatment processes are adequate is crucially important and ensuring there is headroom capacity to address population growth and peak demand is also considered essential. Equally, our research on the causes of bathing water restrictions this summer shows that poor network infrastructure is also an issue along with storm water overflows.

An Fóram Uisce would also encourage more awareness programmes for front of pipe solutions (Think before you flush, Think before you pour, drain safari initiatives etc) as well. Such measures might help build positive relationships with communities until the required infrastructure and processes are in place. We would encourage the CRU to include such initiatives as a metric in the Performance Assessment Framework. IW invest in awareness and stewardship programmes and the positive benefits of these could be monitored and included in the PAF.

An Fóram Uisce considers it extremely important that the CRU monitor compliance with the UWWTD as failures lead to deteriorated water quality in rivers and lakes and potentially downstream source waters.

The CRU is proposing to introduce a new metric to capture a greater proportion of Irish Water's wastewater activities: *Compliance with the Emission Limit Values for Urban Wastewater Licences*. The licensing of wastewater treatment plants provides limits on wastewater discharges to protect the receiving water environment where the discharge occurs. Achieving compliance with these limits is essential to protecting water quality.

Compliance with Emission limit values for Urban Wastewater Licences

The proposed metrics for the overall compliance with emission limit values for Urban Wastewater Licences seems appropriate to An Fóram Uisce along with the specific parameters to capture variations in compliance:

- Overall compliance with the emission limit values for wastewater licences.
- Compliance with Biological Oxygen Demand (BOD) limit values for wastewater licences.
- Compliance with Carbon Oxygen Demand (COD) limit values for wastewater licences.
- Compliance with Suspended Solids (SS) limit values for wastewater licences.
- Compliance with Ortho Phosphate limit values for wastewater licences, where applicable.
- Compliance with Ammonia limit values for wastewater licences, where applicable.

The CRU proposes that IW establish a baseline for compliance over the RC3 period, An Fóram Uisce would like to raise its concern that such a delay will result in non-compliance with UWWTD until 2024. This outcome is most unsatisfactory as the delay in the implementation of the required measures will result in not meeting WFD targets and objectives until 2024. An Fóram Uisce wishes to state categorically that 100% compliance needs to be achieved and all issues resolved by 2024.

An Fóram Uisce would recommend that the CRU take into consideration any new measures included in the 3rd RBMP such as any new conditions associated with Hazardous chemicals and Antimicrobial Resistance Bacteria in wastewater.

Sludge Use and Disposal

Drinking water sludge

An Fóram Uisce welcomes the increase in drinking water sludge reuse by Irish Water and would encourage where possible the reuse of drinking water sludge rather than the disposal to landfill. An Fóram Uisce fully supports the target of 100% compliance with the relevant waste and environmental legislation in sludge management but would encourage IW to aim for circular economy processes where possible.

Wastewater Sludge

The CRU proposes to monitor IW wastewater sludge disposal until 2022 at which point it will set a target of 100% reuse or disposal in compliance with waste and environmental regulation. While this target is welcome by An Fóram Uisce, we would like to impart again the importance to recycling these nutrients and we support measures that contribute to a circular economy particularly considering there is a global need to promote more efficient use of phosphorus and also it's recovery and reuse. Municipal wastewater represents a major source of poorly exploited phosphorus. Current wastewater treatment approaches are driven by water pollution concerns and are "treatment orientated" with emphasis on phosphorus removal to

meet discharge requirements as opposed to recovery and recycling. A recovery-focused approach viewing phosphorus as a resource as opposed to a pollutant needs to be adopted.

ENERGY AND EMISSIONS

With Ireland having declared a National Climate Emergency it is appropriate that Irish Water, the largest public sector user of electricity in the country, seeks to achieve efficiencies in energy use and that they work with the SEAI to reduce emissions and that this is included as a new metric in the Performance Assessment Framework.

Irish Water accounted for 21% of public sector consumption of electricity in 2018. The Climate Action Plan 2019 imposes targets for public sector bodies to achieve 50% energy efficiency improvements and 30% GHG emission reduction by 2030.

Energy consumption

An Fóram Uisce supports the inclusion of energy consumptions targets as a metric in the IW PAF. In its submission to the RC3 to the CRU IW included an energy reduction target of 22GWh and the CRU have accepted this as the target to be achieved by 2024. An Fóram Uisce considers this reasonable.

An Fóram Uisce understands that 22GWh represents approximately 5% of current annual consumption across all of the water and wastewater sites operated by (or on behalf of) Irish Water. Water and sludge pumping infrastructure represent a fairly mature technology. There may be incremental improvements from replacing older kit and rationalising the number of smaller sites, but there is no step-improvement opportunity analogous to the transition from incandescent to LED lighting. So, a 5% target seems reasonable overall, whilst a 50% generic target should apply to lighting and heating of offices.

CO₂ Emissions

As noted above IW is obliged to reduce its CO₂ emissions by 30% by 2030. IW currently report to the CRU on this metric under Capex monitoring and reporting framework and a similar submission will be made under the PAF. The proposed CRU target of CO₂ emissions in line with the 22GWh energy reduction target would seem appropriate to An Fóram.

CONCLUSIONS

The CRU and IW are to be credited for seeking external guidance on best practice from Scottish Water International in the delivery of water and wastewater services as this will no doubt assist with the development of IW as a maturing utility in the Irish market.

An Fóram Uisce would like to compliment the CRU on the work they have undertaken to support and inform the development this Performance Assessment Framework. The PAF is no doubt made stronger through the inclusion of learnings from other jurisdictions and the application of International best practice in the setting metrics and targets for assessment.

An Fóram Uisce remains concerned however about the slow progress in wastewater services upgrades, particularly the high leakage and unaccounted-for-water rates as well as the continued failures to meet in UWWTD targets and An Fóram would like to state again that it is of utmost importance that IW seek to meet all the targets and objectives of the WFD and associated legislation as soon as possible.

Water supply to the Greater Dublin region remains at a knife-edge and with the further postponement of the development of Eastern Midlands Water Supply Project (WMWSP) or alternative source until after the consultation and finalising of the NWRP this remains a particular concern for An Fóram Uisce.

Within the proposed PAF all of the metrics relate to end-of-pipe. An Fóram Uisce would encourage the CRU to consider including some front-of-pipe measures also as these (public awareness campaigns, public engagement activities) promote positive engagement with the public and help garner support for the utility, particularly if they allow for positive community action. A 'value for money' metric would also assist in transparency and trust development with consumers and the public.

An Fóram Uisce would like to thank the CRU for the opportunity to participate in this consultation and hopes that its views will be taken on board and are happy to engage further should any clarifications be required.

END

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