



SUBMISSION TO THE ENVIRONMENT PROTECTION AGENCY

INITIAL VIEWS ON THE REVIEW OF THE NATIONAL INSPECTION PLAN FOR
DOMESTIC WASTE WATER TREATMENT SYSTEMS (2022 TO 2026)

March 2021

Introduction to An Fóram Uisce

An Fóram Uisce | The Water Forum (hereafter, An Fóram) was established in June 2018 in accordance with the provisions of Part 5 of the Water Services Act 2017. An Fóram is the only statutory body representative of all stakeholders with an interest in the quality of Ireland's water bodies. An Fóram consists of 28 members including representatives from a wide range of organisations with direct connections to issues relating to water quality and also public water consumers. Approximately 50 different organisations were involved in the nomination of members.

1. Introduction

An Fóram Uisce welcomes the opportunity to submit initial views on the review on the National Inspection Plan for Domestic Waste Water Treatment Systems (DWWTS). The Environmental Protection Agency delivered a presentation to the Catchment Management Standing Committee on the 26th February 2021 on the proposed review. The key points from the presentation were delivered to the Water Services Standing Committee on the 5th March 2021. Members from both groups welcomed the opportunity to contribute to the early stages of the review process.

The National Inspection Plan for DWWTS is crucial for ensuring the human health and the protection of water quality in Ireland. Members of the Forum suggest that the next National Inspection Plan should be more ambitious to prevent further deterioration of our water bodies, recommending increased inspections with more focus on areas that have been identified as being at risk from DWWTS. While members understand that some of the recommendations made in this document will be limited by resources in Local Authorities, this should not dictate the recommendations made to try reduce the pressures on our water bodies. An Fóram Uisce are in support of recommendations made by the 2020 EPA Report, 'Focus on Local Authority Environmental Enforcement - Activity Report 2019', highlighting the need for local authorities to ensure enough resources are applied to enforcement action when non-compliances are found. If resources in Local Authorities cannot be increased to meet the higher number of inspections required to prevent further deterioration of water quality, the use of private companies, who have no conflict of interest, should be considered.

2. Summary of Recommendations

1. There should be an increase in the total number of annual inspections of Domestic Waste Water Treatment Systems (DWWTS), where the highest weight for targeted inspections should be those that are identified as being at risk from DWWTS. There should also be an increase in targeted inspections at Drinking Water Sources.
2. There needs to be an increase in awareness and training on the Water Framework Directive for Planners, with a particular focus on planning applications in high risk areas and drinking water source protection.
3. The issue of enforcement of compliancy of DWWTS must be addressed. It is essential that a high level of enforcement is established to ensure failures identified during DWWTS inspections are rectified within a short time frame, with consistency across local authorities.
4. There should be a clear focus on compliancy with existing building regulations for new properties, where re-inspections should be carried out to ensure new properties remained compliant to the regulations, particularly in relation to the location and construction or installation of the DWWTS. Remote inspections during part of the construction phase should be considered to ensure high quality of installation of the DWWTS. If resources are to limit the number of re-inspections, there should be a focus on areas that are known to be at risk from DWWTS.
5. Public engagement should be a key part of the next plan, incorporating new ideas to promote awareness in communities on the importance of maintaining DWWTS for the protection of surface waters and local drinking water. The use of buffer strips between the percolation area and local water bodies, with vegetation that aid in nutrient removal, should be encouraged in community awareness campaigns to

improve water quality. Water conservation should also be included in the awareness campaign as a method to reduce volumes of waste from DWWTS.

6. Community-based initiatives on the maintenance of DWWTS should be supported, for example community de-sludging, particularly in high risk areas or those close to drinking water sources.
7. New ideas and incentives should be considered to improve the quality of effluent of DWWTS. As an example, investigation into methods for nutrient removal before going through DWWTS, as an effective approach to reducing pressures on water quality in areas that have been identified as being at risk from DWWTS. This could be achieved through increased funding for research in this area.

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