



**Submission to the Department of Housing, Local Government and Heritage  
on the  
The Presidency Proposal for the Recast Urban Wastewater Treatment  
Directive**

**14<sup>th</sup> July 2023**

## Introduction to the Water Forum

The Water Forum (An Fóram Uisce), established on a statutory basis in June 2018 in accordance with the Water Services Act 2017, facilitates national stakeholder input to water policy development in Ireland. The Forum has advisory functions to the Minister for Housing, Local Government and Heritage, the Water Policy Advisory Committee, Uisce Éireann and the Commission for Regulation of Utilities. The Forum consists of 25 members including representatives from a wide range of organisations with direct connection to water. We provide an opportunity for stakeholders to debate and analyse a range of issues, including the implementation of the Water Framework Directive and Ireland's River Basin Management Plan. The Water Forum's vision is for clean and healthy waters, supporting biodiversity, community wellbeing and economic sustainability.

## Background to the Submission

The Water Forum supports the need for revision of the EU Urban Wastewater Treatment Directive welcomes engagement with the Department of Housing, Local Government and Heritage (DHLGH) on the Presidency Proposal of the Recast of the EU Urban Wastewater Treatment Directive (UWWTD), dated the 1<sup>st</sup> of June 2023. While there are 35 Articles in the Presidency Proposal document, the Forum have made a number of high level recommendations to a selection of the Articles which are more relevant to the Forum.

## Water Forum Recommendations on the Recast of the EU UWWTD

### Article 5: Integrated urban wastewater and urban runoff management plans (IUWWMPs)

Recommendation: Forum supports the proposal for integrated urban wastewater management plans which would contribute to integrated catchment management. The Directive should state that these plans should be publicly available for transparency and to allow oversight from advisory bodies.

### Articles 6 – 8: (Secondary, Tertiary, Quaternary Treatment)

Recommendation: The Forum supports the increase in ambition for these three types of treatment. The Forum recommends that the Directive should state that progress towards meeting these targets should be risk based, with treatment plants posing the greatest risk to water quality or human health addressed first. In addition, and in line with the previous urban wastewater treatment directive, it should be stated that agglomerations of less than 1,000 p.e. are required to provide adequate treatment.

### Articles 9 & 10: Extended Producer Responsibility & Minimum Requirements

Recommendation: The Forum supports all measures to ensure Extended Producer Responsibility for the Quaternary Treatment requirements of listed products placed on the market, including the sharing of data and information with the public.

### Article 13: Local Climatic Conditions

Recommendation: The Forum recommends that future climatic conditions based on the most up to date scientific data should be included in the modelling and design requirements for plant performance. Taking into account sea level rise, lower dilution rates in surface waters due to drought and increased sewer overflows due to increased storm events.

#### **Article 15: Water Reuse and Discharges of Urban Wastewater**

Recommendation: Aside from setting out the minimum reuse and recycling rates for phosphorus and nitrogen from sludge, there is no further mention of nutrient recovery from urban wastewater. Article 15 in the Directive should highlight criteria where nutrient recovery should be included, e.g. at agglomerations >100,000 p.e. or >200,000 p.e. or where the receiving waters are nutrient sensitive. This would not only reduce the levels of nutrients in effluent, it would also support progress towards a circular economy.

#### **Article 22: Information on Monitoring of Implementation**

Recommendation: The Forum supports the increased monitoring and information to be collected as outlined in Article 22. However, recommends that all data sets outlined in Article 22 should be publicly available on request, not just the 'relevant data' as proposed, which could be interpreted differently between users.

#### **Article 24: Information to the Public**

Recommendation: Forum strongly supports this proposal and the need to make data on urban wastewater publicly available. The Forum recommends that Annex VI (and hence information to the public) should include information on the impact of the relevant urban wastewater on the receiving waters (i.e. whether it is currently a significant pressure or not) and details if it is a sensitive area.