



Water Forum Submission to the DHLGH Water Services Policy Statement 2023 – 2030

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Introduction

The Forum welcomes the opportunity to engage with the Department of Housing, Local Government and Heritage (DHLGH) on the draft Water Services Policy Statement and thanks the Department for the briefing to the Forum's Water Services Standing Committee on the 10th October 2023.

The Forum is of the view that the length of the consultation was insufficient for full engagement with Forum members as the Plenary did not have an opportunity to meet during the short time frame. This is a very important policy document, which sets the direction for many other national policies and plans. The Forum would therefore welcome further engagement with the DHLGH as this policy statement is finalised.

Structure / Format of WSPS

The Forum is of the view that the structure of the revised WSPS (2023-2030) is not as clear as the existing WSPS (2018-2025), with a lack of clarity of where different priority objectives should sit. Many national water policies and plans are structured around the themes/objectives of this policy statement (e.g. UE's Capital Investment Plan, National and Regional Water Resources Plans, NFGWS Strategic Plan) therefore it is essential that the structure and themes of the revised statement are well considered and reflect a policy direction that is suitable for all aspects of water and wastewater services in Ireland. Furthermore, the Forum is concerned with the lack of continuity between the current WSPS and the draft WSPS 2023 – 2030, particularly where some of key themes and issues addressed are omitted in the new statement.

Uisce Eireann's draft Capital Investment Plan for RC4 has been developed around the existing WSPS themes (Quality, Conservation and Future Proofing) and it is unclear how the new policy objectives (Availability and Reliability, Safety and Quality and Sustainability) would be any improvement to this investment planning. Furthermore, the National Federation of Group Water Schemes (NFGWS) has developed its Strategic Plan around the original themes of Quality, Conservation and Future Proofing, and the NFGWS is of the view that the revised WSPS should revert to these original themes for continuity and clarity in direction.

Recommendations – Structuring / Formatting of the WSPS

1. The Forum recommends that the final WSPS should revert back to the themes Quality, Conservation and Future Proofing, for continuity with the previous policy statement and better alignment with associated plans which have stemmed from this statement, such as the UE Capital Investment Plan for RC4. The priority objectives of the new 'Availability and Reliability' should then be included in the relevant themes of Quality, Conservation and Future Proofing.
2. The Forum is of the view that the Quality Theme should be presented first due to the significance of both public health and the protection of the environment.
3. A high-level theme of conservation which encompasses resource management, abstraction control, source protection, tackling leakage and encouraging behavioural change, similar to the existing WSPS is better structured, with a clear link between the priority objectives and the high-level theme. These are disconnected in the revised policy statement.
4. The Policy Objective '*Safety and Quality; Water services will be safe and protect human health and the environment*' in the draft WSPS— only has priority objectives to address drinking water. The Forum is concerned that environmental protection is not adequately addressed in the revised WSPS, and recommends that a new priority objective (e.g. Environmental Protection) should be included. This is particularly relevant to addressing impacts from wastewater (both urban and rural) for both public health and environmental protection.

5. The Forum is concerned that the 3rd Policy Objective ‘Sustainability’ does not sufficiently reflect environmental protection, and the title should revert back to ‘Future Proofing’ or be expanded to ‘Sustainability and Future Proofing’. This should include a key priority objective to address wastewater and the protection/restoration of waterbodies.
6. The Forum recommends that there is greater clarity with the term ‘water services’ in the final WSPS, indicating whether it is referring to either drinking water and or wastewater services, or both. The existing WSPS better differentiates between objectives for drinking water and wastewater services. Furthermore, there should be further differentiation between public drinking water services, and private drinking water services in the final WSPS.
7. In the design of the final WSPS, significant priority objectives for the 2023 – 2030 timeframe should be emphasised, such as addressing the vulnerability of the water supply to the Greater Dublin Area through the Shannon Supply Project, to highlight their significance during the next policy statement.

Urban Wastewater

The Forum is of the view that the draft WSPS lacks a clear focus on wastewater, with no mention of the need to address the public health implications of wastewater contamination (e.g. through contamination of drinking water, bathing waters, shellfish waters), or the environmental impacts from wastewater (e.g. through impacts on the quality of water bodies, shellfish waters, freshwater pearl mussel). This is particularly important to sustainably support future population growth, increased housing and economic growth.

While the obligations of the EU Water Framework Directive are introduced in the policy background of the draft WSPS, they are not reflected in the policy or priority objectives. The Forum acknowledges and is supportive that the draft WSPS outlines that a key priority objective to bring wastewater services to full compliance with the EU Urban Wastewater Treatment Directive, it is concerned over the lack of commitment to meet the Water Framework Directive requirements.

While the Forum acknowledges there is a Priority Objective ‘Implementation of the Programme of Measures in River Basin Management Plans’ in the draft WSPS, it is of the view that this section is weakened since the previous WSPS. For example, the previous WSPS includes the commitment to *“Prioritise investment in urban wastewater treatment plants to support the protection of high-status waters and to achieve water quality improvements in other water bodies targeted for action in the RBMP 2018-2021, including prioritising the investment that is needed to support the achievement of objectives for designated shellfish-growing and bathing waters”*. There is currently no mention of protection or restoration of waterbodies in the draft WSPS. While the ‘Implementation of the Programme of Measures in River Basin Management Plans’ is of course a key policy tool to address the protection/restoration of waterbodies, this over-arching water services policy statement should clearly outline the policy objectives and how it will prioritise investment and resources to ensure compliance with the EU Water Framework Directive.

Recommendations – Urban Wastewater

1. The final WSPS should indicate how it will prioritise investment in urban wastewater treatment to ensure compliance with the EU Water Framework Directive, in line with the commitment in the Programme for Government to *“Ensure that the State complies with the EU Water Framework Directive.”* The WSPS should refer to the need to protect and restore waterbodies, shellfish waters and bathing waters, similar to what is included in the previous WSPS.

Domestic Wastewater

The Forum acknowledges that there is a priority objective which outlines the grant available for domestic wastewater treatment systems in the 'Availability and Reliability' Policy Objective. This is currently misleading as it states that '*grants are available to assist householders in carrying out works to rectify or upgrade a defective DWWTS*', when the grant is actually only available to a very small proportion of households with a septic tank. Currently, this grant is only available to households who have had their septic tank inspected, which is only 0.2% of all septic tanks annually, or households which are in a priority area for action or high status waterbody objective catchment.

In 2021, the Water Forum made a recommendation to the Rural Water Section of the DHLGH, for a revision of this grant scheme to reduce or remove the current obstacles for uptake of this grant, such as the date of registration of the septic tank. The Forum also recommended that the grant scheme should be made available to all homeowners in Zone 1 (i.e. the 6000 dwellings that are within 100m of water bodies and have been identified as being at risk from DWWTS), as a proactive measure to address the pressure from domestic wastewater on waterbodies.

Recommendation – Domestic Wastewater

1. The final WSPS should include a commitment to revise this grant scheme in an attempt to address domestic wastewater as a pressure on waterbodies, in line with obligations of the EU WFD and commitments of the next RBMP.

Drinking Water

While the draft WSPS includes priority objectives to address investment to maintain existing water services and to support community owned water supplies, the Forum is of the view there is insufficient attention on supporting water supply through private wells (despite representing ~10% of the population). As highlighted in EPA Drinking Water Quality Reports, the quality of drinking water from private wells is significantly lower than public water supplies and the EPA recommends that homeowners test their well at least once annually. A recent nationally representative survey commissioned by the Water Forum, indicated that only 25% test their well annually, with 27% not testing their well at all.

Recommendations – Drinking Water

1. The Forum recommends that more a more ambitious priority objective to address drinking water quality issues in private wells is included in the final WSPS, not to only offer grants to carry out improvements to defective supplies, but also to address the communication needed around maintenance and testing of wells. The Forum recommends that the Department should review the possibility of offering supports for water quality testing from private wells.

Water Conservation

The Forum welcomes the reference to the Water Forum's position on Water Conservation in the draft WSPS. The Forum is however concerned that the only commitment in relation to this position is for the Department to "*work with An Foram Uisce to build upon their current research to realise the most effective outcomes in terms of enhancing the delivery of water conservation nationally*".

The Forum recommends that this section is strengthened with a commitment to develop a strategy for water conservation in Ireland, in line with the Forum's key recommendation. This is also in line with

one of the recommendations made by the Joint Oireachtas Committee on the Future Funding of Domestic Water Services, which recommended that *“the Government should develop a cross departmental strategy to increase water conservation”*.

Overall, the Forum is of the view that the new priority objective to address conservation in the draft WSPS is weaker than the previous policy statement. The Conservation theme in the previous policy statement which committed to *‘Embedding conservation at the heart of water policy involves prioritising resource management, abstraction control, source protection, tackling leakage and encouraging behavioural change.’*, was more ambitious, with more clear commitments than what is included in the revised draft WSPS.

The recommendations made by the Joint Oireachtas Committee on the Future Funding of Domestic Water Services in Ireland specific to water conservation shaped the water conservation theme of the WSPS 2018-2025. Many of these high-level commitments in the current WSPS have not been completed or even progressed, and are therefore still relevant to the next iteration of the WSPS.

The Forum recommends that the following key recommendations made by the JOC should be reflected in the final WSPS;

- *“The Committee recommends that the Government should develop a cross departmental strategy to increase water conservation. It should focus on education and awareness; retrofitting; stronger building standards and regulations for all new residential builds.”*
- *“a proactive retrofitting programme to provide for the maximum level of water conservation, an ambitious amendment to existing building standards and regulations to ensure the maximum level of water conservation”*.

The Forum is supportive of the priority objective to drive behavioural change through awareness, education and information. The Forum is of the view, however, that there is a gap in water efficiency in the revised WSPS. This is particularly relevant to alignment with the SDG 6 targets which are stated as the *“guiding framework for the development and delivery of all new policy objectives for water services in Ireland”*. The Forum recommends that the revised WSPS should reflect the UN SDG 6 target for *“substantially increased water-use efficiency targets across all sectors”*, by including a priority objective for ‘Water Efficiency’. This would include a cost benefit analysis of increasing water efficiency targets in the building regulations. The current WSPS has a commitment that *“Government Departments and agencies and State bodies will be encouraged to play a leadership role in sustainable water use”*, which should be included in the final WSPS.

Recommendations – Water Conservation

1. The Forum recommends that water conservation is strengthened in the final WSPS, with a commitment to develop a strategy for water conservation in Ireland, in line with the Forum’s key recommendation, and also in line with the recommendations of the JOC.
2. The final WSPS should reflect the relevant recommendations made by the JOC in relation to water conservation, including a cross departmental strategy to increase water conservation and an ambitious amendment to existing building standards and regulations to ensure the maximum level of water conservation.
3. The Forum recommends that the revised WSPS should reflect the UN SDG 6 target for *“substantially increased water-use efficiency targets across all sectors”*, by including a priority objective for ‘Water Efficiency’ which should include a cost benefit analysis of increasing water efficiency targets in the building regulations.

Climate Change

The Forum acknowledges and is supportive of the priority objective within ‘Sustainability’ to *‘Decarbonise the energy and materials used in water services and progress towards biodiversity net gain’*. The Forum is of the view that more emphasis could be placed on both climate mitigation and climate adaptation in relation to water services, which should underpin the three high-level policy objectives.

Water is the medium through which many of the impacts of the climate crisis are felt by society (e.g. flooding, drought, water shortages, sea level rise), therefore water resource management is key for climate change adaptation. This WSPS should reflect the need for alignment between national climate and water policies.

Future revisions of the Water Quality and Water Services Infrastructure Climate Change Sectoral Adaptation Plan should consider recommendations made by O’Loughlin and Mozafari (2023) and Taylor et al. (2023), as summarised in the Forum’s policy brief on climate change and Ireland’s water resources¹.

¹ [Policy-Brief-Climate-Change-Impacts-Summary.pdf \(thewaterforum.ie\)](#)