



## Water Forum Submission to Uisce Éireann draft Capital Investment Plan 2025 to 2029

### Introduction to the Water Forum

The Water Forum (An Fóram Uisce) was established in June 2018 in accordance with the provisions of Part 5 of the Water Services Act 2017. The Water Forum is the national statutory body representative of stakeholders with an interest in the quality of Ireland's water bodies. The Water Forum consists of 25 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. 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. As outlined in the Water Services Act 2017, the Forum has a statutory role to make recommendations to Uisce Éireann in relation to the performance of its functions and on any policy document prepared by Uisce Éireann.

### Background to the Uisce Éireann Capital Investment Plan 2025 to 2029

The Uisce Éireann (UÉ) draft Capital Investment Plan 2025 to 2029 has been prepared by UÉ as part of the process of developing the Capital Investment Plan for submission to the Commission for Regulation of Utilities (CRU) as part of the Regulatory Control Period (RC4) 2025 to 2029. UÉ have stated that this capital budgetary plan will be in line with the themes as set out in the Government's Water Services Policy Statement (WSPS) and the strategic objectives as set out in UÉ's Water Services Strategic Plan (WSSP).

The Water Services Policy Statement (WSPS) of the Department of Housing, Local Government and Heritage is the national policy document to provide clear direction to strategic planning and decision making on water and wastewater services in Ireland. There are three key themes identified in the WSPS.

1. **Quality** – Improving compliance with public health and environmental standards.
2. **Conservation** – Prioritising resource management, abstraction control source protection, tackling leakage and encouraging behavioural change.
3. **Future Proofing** – Ensuring water services investment decisions are aligned with the strategic aims of national planning and climate change policies.

This Policy Statement outlines specific objectives in relation to: Resource management and source protection, tackling leakage, reducing water usage and encouraging behavioural change through awareness, education and information. These objectives should all be reflected in UÉ's Capital Investment Plan 2025 to 2029 (RC4).

### Background to the Water Forum Submission

The Forum acknowledges that UÉ is consulting with key stakeholders, such as the Water Forum on the draft Capital Investment Plan 2025 to 2029, ahead of the public consultation with the Commission for Regulation of Utilities. It was a challenging time to engage with Forum members during August to develop a response to this stakeholder consultation, therefore we reserve the right to make further comments on this significant plan during the public consultation with the CRU.

The Forum acknowledges the detail of proposed investment in the draft plan for RC4, and welcomes the proposed investment to address water quality, leakage, sustainability and future proofing.

The Forum has made a number of recommendations relevant to the RC4 Capital Investment Plan under the following headings:

1. Transparency in progress and outcomes for RC4
2. Water Conservation and the Use Less Pillar
3. Urban Wastewater and the River Basin Management Plan
4. Future Proofing

Furthermore, the Forum has made recommendations relevant to UÉ's OPEX (operational) budget, which are presented in the Appendix of this submission. The Forum is of the view that they are critical elements for the delivery of water and wastewater services and recommends that they are included as parallel programmes in UÉ's submission to the CRU for RC4.

## Water Forum Recommendations to the UÉ draft Capital Investment Plan 2025 to 2029 (RC4)

### Summary of Water Forum Recommendations

#### **1. Transparency**

1.1 The Forum is of the view that there should be greater transparency and accountability for the delivery of projects and the proposed outcomes for the RC4 period.

1.2 The Forum recommends that the Project Listing Table of Appendix 4 is updated to include both the Investment Case and the Measure Category for every project to ensure there is transparency and accountability across the planned projects for the RC4 period, along with an estimated timeline for completion. For example, identify if the project will address:

- Water treatment plants on the EPA's remedial action list
- Agglomerations where wastewater is a significant pressure, identified in the RBMP

1.3 The Forum recommends that the Table of Proposed Outcomes (Table B, Page 9) not only includes projects that will be completed during RC4, but also those that will be progressed during the investment cycle.

1.4 The Forum recommends there is greater clarity on expected leakage reduction over the RC4 period and include expected reductions in leakage as a percentage of treated water produced.

#### **2. Water Conservation and the Use Less Pillar**

2.1 The Forum recommends the capital investment plan RC4 should include a programme to address demand reduction to support the water conservation theme of the WSPS. This should be reflected with a clear investment case and proposed outputs which should be included in Table B (Page 9). This could include expenditure for water conservation initiatives, such as supplying water saving kits to households, piloting smart meters, community water saving technologies or IT systems that could provide open access to data on water deficits and water use.

2.2 The investment case for Metering (Abstraction Meters, Non-Domestic and Domestic), under the Future Proofing theme, could also be used to support the water conservation theme, as they could support UÉ to assess the impact of water conservation campaigns on consumer demand.

#### **3. Urban Wastewater and the River Basin Management Plan**

3.1 The Forum recommends that the upgrade of wastewater treatment plants in the remaining freshwater pearl mussel priority areas are included in the RC4 plan.

3.2 The Forum recommends that the remaining 24 assessments required in shellfish waters (as identified by the EPA) to determine impacts from urban wastewater are completed during the RC4 period.

- 3.3 The Forum recommends that in the Table of Proposed Outcomes (Table B, page 9), there is a clear commitment to mitigate environmental risks from stormwater overflows through investment in monitoring equipment to measure how often and for how long waste water is discharged through storm water overflow outlets.
- 3.4 The Forum recommends that there is a commitment to a set number of Drain Area Plans to be completed during the RC4 period to address sewer flooding.
- 3.5 The Forum recommends that there should be a table included in RC4 which includes other activities such as project design, which will be progressed during RC4 but will not be completed until RC5. This would ensure transparency and accountability of progress across different projects.
- 3.6 The Forum recommends that Table B (Page 9) is updated to include the commitment for completion of remaining assessments to address the 208 waterbodies currently impacted by urban wastewater. This should be included in the investment case 'Waterbody impact'.

#### **4. Future Proofing**

- 4.1 The Forum recommends that Uisce Éireann ensure adequate funding for capital investment for the completion of water and wastewater projects of national importance, such as the Water Supply Project Eastern and Midlands Region and Greater Dublin Drainage Project.
- 4.2 Investment in resilience in terms of climate change should ensure assets can cope with extreme weather events, including prolonged periods of drought and its impacts on source water quality and treatment requirements, as well as impacts from flooding on source water quality and treatment capacity at wastewater treatment plants.

### Background to Water Forum Recommendations on the draft Capital Investment Plan RC4

#### **1. Transparency in Progress and Outcomes for RC4**

The Forum is of the view that there should be greater transparency and accountability for the delivery of projects and the proposed outcomes for the RC4 period.

Firstly, the Project Listing Table in Appendix 4 (Page 96) currently has 3 columns - County, Asset Type and Project Title and it is not clear what investment case or measure category it is related to. For example, for the Project 'Carlow Wastewater Treatment Plant', will this address one of the waterbodies impacted by urban wastewater (Investment Case – Waterbody Impact), or will it address one of the measure categories in the Treated Wastewater Investment Case. This would also increase transparency around the decision-making process within UÉ on what projects are prioritised. Furthermore, the estimated costs (to the extent that UÉ have it) for each of the projects should also be included in this Project Listing Table, as this would help future assessments of whether increased building/material costs could result in additional investment requirements for planned projects, or where potential savings could allow flexibility in other projects.

The Forum recommends that this table is updated to include both the Investment Case and the Measure Category for every project, along with estimated costings (where available), to ensure there is transparency and accountability across the planned projects for the RC4 period.

County	Asset Type	Project Title
Carlow	Wastewater	Muinebheag and Leighlinbridge Wastewater Treatment Plant
		Carlow Wastewater Treatment Plant
		Wastewater Network (New) - Tullow
Cavan	Wastewater	Ballieborough Wastewater Treatment Plant
		Cootehill Wastewater Treatment Plant
		Kingscourt Wastewater Treatment Plant
		Virginia Wastewater Treatment Plant

Furthermore, Table 8.2.1 (Page 66) includes proposed outcomes for the different investment cases of the draft capital investment plan. Under the Drinking Water Quality Investment Case, it states that there will be 26 “Completed works at water treatment plants to facilitate the removal from the Remedial Action List”. This is less than half of the 58 plants on the EPA’s RAL, based on figures from latest EPA 2022 Drinking Water Quality Report. While the Forum acknowledges that there could be design and planning for some of these plants during the RC4 period (where the works will not be completed by 2029), the Forum recommends that all planned works should also be included in the plan (even if they won’t be completed) as they too will require investment. This will improve transparency and accountability in commitments during the next investment cycle. The same applies to the need for additional information on planned works (including assessment and design) for the remaining 128 agglomerations which are identified as a pressure on waterbodies, in addition to the 30 agglomerations which are planned to be completed.

**Table 8.2.1 – Committed Outcomes for RC4 Investment Plan**

WSPS Theme	Investment Case	Measure Category	Definition	UoM	Quantity
Quality	Drinking Water Quality	Schemes on the EPA Remedial Action List	Completed works at water treatment plants to facilitate the removal from the Remedial Action List	No.	26
		Drinking Water Quality - High Risk Water Quality issues (Crypto, BWN, DNC, DWSP etc.)	Completed works at water treatment plants to resolve specific high risk water quality issues	No.	249
		Orthophosphate Dosing (Lead)	Water treatment Plants with orthophosphate treatment facilities installed	No.	43
		Greater Dublin Area Water Resilience	Improving the capacity of our supply network and providing greater levels of security of supply	MED	28

Finally, under the investment case Leakage, Table B (Page 9) indicates that the proposed outcome is for a net water savings of 137 mega litres per day. The Forum recommends that there is greater clarity here on the expected reduction in leakage during the RC4 period, where the percentage reduction in leakage should be included.

## 2. Water Conservation and the Use Less Pillar

Uisce Éireann's National Water Resources Plan adopted a three-pillar approach, 'Use Less, Lose Less and Supply Smarter';



While the Lose Less and Supply Smarter pillars are well represented in the draft capital investment plan for RC4, the Forum is concerned that the Use Less Pillar (i.e. using and wasting less treated water) is not represented. The Water Services Policy Statement states that *“The promotion of water conservation and water resource management is to be reflected in strategic investment planning by Irish Water, to include work programmes around leak detection and repair, network improvements, cost effective metering, public awareness campaigns and funding to fix customer side leaks.”*

The Forum recommends that water conservation through demand management should be significantly increased over the next investment cycle. While Uisce Éireann is using an estimated population growth increase of 21% (1.2 million people) over the next 25 years for water management, the CSO have stated that this could be up to 41% (1.9 million people), which would result in significantly higher water demand across Ireland. Furthermore, the assessment of water supplies for the National Water Resources Plan to determine supply demand deficits has assessed the ability of the water treatment plants to meet varying weather events over 25 years, such as the ability of the water treatment plants to meet varying weather events such as “Dry Year Critical Periods” and “Winter Critical Periods”. Projections for climate change in Ireland indicate that extreme weather events will become more common, including increased frequency and duration of extended dry and drought conditions, which will extend beyond 25 years. Water conservation through behavioural change and demand reduction should be considered as a climate change adaptation tool to adapt to greater peaks in demand with increasing temperatures and lower water availability during times of extended dry and drought periods.

The Proposed Outcomes for RC4 Investment Plan 2025 to 2029 are presented in Table B (Page 9) which presents investment cases for water quality, conservation and future proofing, aligned with the three themes of the Government's Water Services Policy Statement. Within the 'Conservation' theme, it presents two investment cases; one for leakage and one for sustainability (which addresses renewable energy and energy efficiency). The Forum supports these proposed investment cases. However, there is no investment case to address conservation through demand reduction.

Table 4.2b (Page 28) presents the Strategic Objectives for RC4, for the WSPS theme of Conservation, linked to Asset Needs and Investment Cases. It includes three Strategic Aims:

1. WS3 - Manage water supplies in an efficient and economic manner, under the investment case 'Leakage'
2. EN1 - Ensure that Irish Water services are delivered in a sustainable manner which contributes to the protection of the environment, under the investment case 'Sustainability'.

3. EN2 - Operate our water services infrastructure to support the achievement of water body objectives under the Water Framework Directive and our obligations under the Birds and Habitats Directives, under the investment case 'Sustainability'.

The Forum recommends that capital investment plan for RC4 should include a Strategic objective to address conservation through demand reduction under the WSPS theme of conservation. This could include expenditure for water conservation initiatives, such as supplying water saving kits to households in areas where there is a significant supply demand deficit, piloting smart meters or supporting community water saving technologies, in an effort to support demand management and the use less pillar. Furthermore, IT systems that could provide open access, GIS-linked data on water supply deficits and water use restrictions to the general public, should be included as a water conservation measure. The Forum acknowledges that this may be a relatively small investment case relative to some of the other objectives, however there is still a need to fully align the investment plan with the WSPS and ensure there is a commitment to address water conservation through behavioural change during the next investment cycle.

Furthermore, the investment case for Metering (Abstraction Meters, Non-Domestic and Domestic), under the Future Proofing theme, could also be used to support the water conservation theme, as they could support UÉ to assess the impact of water conservation campaigns on consumer demand.

### 3. Wastewater Treatment

The EPA Report on Urban Wastewater Treatment in 2021 highlighted a number of recommendations for urban wastewater, which do not appear to be included in the RC4 Capital Investment Plan.

- The EPA requires Uisce Éireann to improve waste water treatment at 12 towns and villages to protect vulnerable freshwater pearl mussels in the local rivers. There are plans to complete 8 of these in RC3 (2023 and 2024), however there are no clear plans to address the remaining 5. It is not clear from the RC4 draft plan if these will be addressed as there is no mention of upgrading plants in freshwater pearl mussel priority areas. The Forum recommends that the upgrade of wastewater treatment plants in the remaining freshwater pearl mussel priority areas are included in the RC4 period.
- The EPA requires Uisce Éireann to assess the impacts of waste water discharges on designated shellfish waters around our coast, to identify where waste water discharges must improve to protect shellfish waters and public health. The EPA identified that assessments are required for the remaining 24 shellfish waters to determine impacts from urban wastewater, which are currently not included in the RC4 draft plan. The Forum recommends that the assessment required in these 24 shellfish waters to determine impacts from urban wastewater are completed during the RC4 period.
- There are an estimated 2,350 overflow outlets (storm water overflows) on Ireland's waste water collecting systems. According to the EPA, UÉ does not have enough information on discharges of untreated waste water released into the environment through these outlets and the EPA have recommended that UÉ should allocate resources in its next investment plan to mitigate any environmental risks from storm water overflows identified through this work. While there is a National Stormwater Overflow Project in the Project Listing Table of the Appendix, it is not clear from the RC4 draft plan how much works are planned to mitigate environmental risks from stormwater overflows. The Forum recommends that in the Table of Proposed Outcomes, there is a clear commitment to mitigate environmental risks from stormwater overflows through investment in monitoring equipment to measure how often and for how long waste water is discharged through storm water overflow outlets.
- In the 2021 Urban wastewater treatment Report, the EPA recommended that future upgrades to wastewater networks/sewer flooding will incorporate SUDS/Nature Based solutions into the design and will require collaborations with local authorities on the integrated urban design, as proposed by the Recast UWWTD. While there is a measure category 'Wastewater Discharge Licencing Compliance & Sewer Flooding' to address sewer flooding, it is not clear to what extent this will be done during the RC4 period. The Forum recommends that there is a commitment to a number of Drain Area Plans to be completed during the RC4 period to address sewer flooding.



## River Basin Management Plan

The draft capital investment plan for RC4 outlines the requirements of the third cycle River Basin Management Plan (RBMP) and stated that “UÉ has engaged with the DHLGH, EPA and other stakeholders during the preparation of the RBMP and it is expected that the Programme of Measures in the RBMP will require investment from UÉ that will need to be incorporated into the Investment Plan.”

The draft 3rd Cycle River Basin Management Plan identifies 217 urban wastewater significant pressures on 208 water bodies. In the draft plan for RC4, UÉ state that across the 208 water bodies, it is estimated that primary discharges from 158 wastewater treatment plants and stormwater overflows from 33 wastewater networks are associated with urban wastewater impact on waterbodies. Each will be required to be assessed to understand the impact, and to determine the measures required to mitigate the impact (Page 41).

UÉ stated that RC4 activity across the 158 WWTPs whose primary discharges have been identified as significant pressures will span across project lifecycle from assessment of needs, progressing detailed designs to construction. The Forum is concerned however that the only clear commitment in the draft capital investment plan to address urban wastewater pressures on waterbodies is for 30 agglomerations to be completed during the RC4 period under the investment case ‘Waterbody impact’, related to the Draft 3rd Cycle River Basin Management Plan (RBMP), Table B (Page 9). This investment case does not include any details of progress for additional assessments/design for the remaining agglomerations which will be carried out in the RC4 period (as outlined on Page 41). The Forum recommends that further commitments and details for progress (e.g. assessments, design) for the remaining 128 agglomerations be included in the final plan for RC4.

**Table B – Proposed Outcomes for RC4 Investment Plan 2025 to 2029.**

WSPS Theme	Investment Case	Measure Category	Definition	UoM	Quantity
	Water Body Impact	Draft 3rd Cycle River Basin Management Plan (RBMP) 2022-2027	No. of agglomerations in draft 3rd Cycle RBMP (2022-2027) where works have been completed	No.	30

## 4. Future Proofing

It is important to ensure water services investment decisions are aligned with the strategic aims of national planning and climate change policies. The provision and capacity of utilities play a critical role in residential and commercial development. This capacity is of real concern, where any sites, particularly in the Greater Dublin Region, now have capacity or upgrade issues. Drinking water supply security for the Eastern Region is of great concern, given its chronic reliance on unsustainably high levels of extraction from the River Liffey and taking into account future climate change projections of increased frequency and duration of extended dry and drought conditions in the east of the country. It is essential that Uisce Éireann ensure adequate funding for capital investment for the completion of water and wastewater projects of national importance, such as the Water Supply Project Eastern and Midlands Region and Greater Dublin Drainage Project, to avoid adversely impacting on the Government’s *Housing for All* initiative.

Future proofing Ireland’s water and wastewater services will need to address the challenges expected with future climate change. The Climate Status Report for Ireland (EPA, 2021) predict changes in seasonality and precipitation patterns, increased incidence of extreme weather events and a gradual continued rise in sea level. It is therefore essential that all future assets are designed to ensure resilience for projected extremes in weather events.

Extended dry periods are expected to increase by an average of 16%, with largest increases during summer months (16-21%) (Nolan and Flanagan, 2020). A subsequent reduction in flows and levels of rivers and lakes can result in less dilution of contaminants present in surface and subsurface waters and could lead to concentrations of pollutants above Environmental Quality Standards. Furthermore, severe degradation (drying) of organic rich soils, i.e. peatlands will cause accelerated peat decomposition, export of dissolved organic carbon and particulate organic matter. Increased dissolved organic carbon will exacerbate disinfection by-product issues in drinking water, such as the formation of carcinogenic trihalomethanes (THMs).

In contrast, the number of wet days (>20mm/day) is expected to increase by between 9% (RCP 4.5) and 16% (RCP 8.5), while the number of very wet days (>30mm/day) is expected to increase by between 21% (RCP 4.5) and 31% (RCP8.5). Largest increases will occur in the north and west coast of Ireland. Rapid high intensity precipitation mobilises contaminants, sediments, and waterborne pathogens from land to water, thereby impacting source water quality and subsequent treatment requirements. In addition, high rainfall and flooding can overwhelm sewage systems resulting in stormwater overflows and an increased risk of pollution from urban wastewater to receiving waters, posing a greater risk to water quality and public health.

Project design for future investment for both water and wastewater must ensure that these challenges are incorporated into planning to ensure resilience in water supply and wastewater treatment into the future. Furthermore, it is expected that the Recast EU Urban Wastewater Treatment Directive will be approved and published in 2024 and will therefore be transposed into Irish law during the RC4 period. There will need to be some flexibility allowed in the investment plan to account for additional requirements that will arise.

## Appendix

### Water Forum Recommendations to Uisce Éireann's OPEX budget to support the delivery of the RC4 Capital Investment Plan

The Forum understands that Uisce Éireann's OPEX budget is developed annually, however the Forum is of the view that a portion of the OPEX budget should be developed to align with the capital investment cycle periods, to support the delivery of key strategic objectives outlined in the capital investment plan. The Forum is of the view that the recommendations below are critical elements for the delivery of water and wastewater services and recommends that they are included as parallel programmes in UÉ's submission to the CRU for RC4.

### Summary of Water Forum Recommendations for Uisce Éireann's OPEX budget

#### 1. Water Conservation

- 1.1 The Forum recommends that the Opex budget should include a Strategic objective to address conservation or demand reduction through behavioural change, education and awareness, under the WSPS theme of conservation.
- 1.2 The Forum recommends that water conservation education and awareness should be included in the investment planning for RC4.
- 1.3 RC4 should reflect the additional responsibilities UÉ will have in relation to communication with the public on water use and water conservation.

#### 2. EU Recast Drinking Water Directive and Customer Communications



- 2.1 The Water Forum recommends that the final plan for RC4 includes an investment case to improve communications with customers, in line with the requirements of the EU Recast Drinking Water Directive.
- 2.2 The Forum recommends that open-source information is made available for water supply services to build trust in UE and their supply of drinking water.

**3. Publicly sourced Group Water Schemes**

- 3.1 The Forum recommends that the Opex budget includes sufficient operational resources to facilitate the ‘Take in Charge’ (TIC) and operation of publicly sourced group water schemes who have either already, or are intending, to request to be taken in charge by Uisce Eireann. The Forum would encourage further liaison between the DHLGH, NFGWS, CCMA and UÉ to quantify and plan the resources needed over the next 5 years.

**4. Resourcing – assessments for urban wastewater**

- 4.1 The Forum recommends that the Opex budget includes adequate resourcing to carry out to complete the assessments, design and planning for the remaining wastewater treatment plants or networks which are impacting the 208 waterbodies, to progress Ireland in meeting its obligations of the EU Water Framework Directive.
- 4.2 The Forum recommends there that the Opex budget includes adequate resourcing to carry out the required assessments of the remaining shellfish waters, priority water for freshwater pearl mussel, stormwater overflows and drain area plans.

Background to Water Forum Recommendations for Uisce Éireann’s OPEX budget

**1. Water Conservation and the Use Less Pillar**

Uisce Éireann’s National Water Resources Plan adopted a three-pillar approach, ‘Use Less, Lose Less and Supply Smarter’;



While the Lose Less and Supply Smarter pillars are well represented in the draft capital investment plan for RC4, the Forum is concerned that the Use Less Pillar (i.e. using and wasting less treated water) is not represented. The Water Services Policy Statement states that “The promotion of water conservation and water resource management is to be reflected in strategic investment planning by Irish Water, to include work programmes around leak detection and

*repair, network improvements, cost effective metering, public awareness campaigns and funding to fix customer side leaks.”* While there are programmes proposed for most of these objectives in the draft plan for RC4 (Table 8.2.1, Page 66), there are no programmes linked to water conservation through behavioural change, education and awareness, as required by the Water Services Policy Statement. While Education and Awareness would not be considered a capital investment, the Forum recommends that there is funding allocated through OPEX for a parallel programme to address the behavioural change required for the Use Less Pillar of the NWRP.

The Water Forum has developed a position on water conservation in Ireland and has called for a government-led strategy on water conservation<sup>1</sup>. Research<sup>2</sup> commissioned by the Water Forum to improve domestic water conservation in Ireland has highlighted the need for education to support water conservation, including a bottom-up understanding of water, from the processes that underpin treatment and supply, to the energy and resources required to produce drinking water. While there will be many stakeholders who will have a role in increasing water conservation education in Ireland, UÉ should have a significant role as they are the single public utility for water services in Ireland. The Forum recommends that water conservation education and awareness should therefore be included in the investment planning for RC4. Efforts to influence behavioural change and reduce water demand would also support the UÉ Strategic Objective WS2 of the capital investment plan for RC4; to ‘Manage the availability, sustainability and reliability of water supply now and into the future’ (Table 4.2c, Page 29).

Efforts to increase communication and engagement with consumers to increase knowledge and awareness on water use and conservation initiatives, would also support the requirement of the Recast of the EU Drinking Water Directive, which states that:

*“In order to make consumers more aware of the implications of water consumption, they should receive information in an easily accessible manner, for instance on their invoices or by smart application, on the volume consumed per year, changes in consumption, a comparison with average household consumption where such information is available to the water supplier, as well as on the price per litre of water intended for human consumption, thereby allowing a comparison with the price of bottled water.”*

These requirements of the Recast Drinking Water Directive are not reflected in the draft capital investment plan for RC4 and the Forum recommends there is a clear list of commitments/actions in RC4 to address water conservation and the required communication with the public.

## **2. Recast DW Directive and Customer Communications**

The Recast EU Drinking Water Directive was transposed into Irish Law in January 2023. These new Drinking Water regulations set out provisions for how UÉ will manage and monitor drinking water standards, including improved access requirements, stricter parameters on quality and increased powers for regulators. These are new regulations with significant additional requirements and UÉ have stated they are currently working to understand these implications and the potential impact on the RC4 Investment Plan and beyond. The Forum is concerned that the current draft for RC4 does not reflect the additional requirements of the Recast Drinking Water Directive.

Article 17 of the Recast EU Drinking Water Directive, ‘Information to the public’ sets out new requirements for improving communications and knowledge with consumers. A new requirement of the Recast EU Drinking Water Directive is that “up-to-date information is accessible to consumers on-line, in a user-friendly and customised way. Consumers should also be able to request access to this information by other means, upon justified request.”

The Water Forum recommends that the final plan for RC4 includes an investment case to improve communications with customers, in line with the requirements of the new Directive. In its submission on the draft Regional Plan for the Eastern and Midlands Region, the Water Forum recommended that UÉ should highlight how they will increase transparency in their data and monitoring; making open-source information available for water supply services so that the public and stakeholders can make informed contributions to public consultation processes and to build trust in the water utility. While the budget for this would be small relative to other projects, it is still necessary to include it in RC4 to ensure the necessary budget is available to improve customer communications.

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<sup>1</sup> [Water forum policy position on water conservation \(thewaterforum.ie\)](https://thewaterforum.ie)

<sup>2</sup> [Water-Forum-Domestic-Water-Conservation-Policy-Brief-Final.pdf \(thewaterforum.ie\)](#)

The new Directive states that *“The purpose of better consumer knowledge of relevant information and improved transparency should be to increase citizens’ confidence in the water supplied to them, as well as in water services, and should lead to an increased use of tap water as drinking water, which could contribute to reduced plastic usage and litter and greenhouse gas emissions, and a positive impact on climate change mitigation and the environment as a whole.”* The Forum supports the need for improved customer communications and recommends that it is reflected in the RC4 Plan.

### **3. Publicly sourced Group Water Schemes**

The Forum is aware that there are significant numbers of publicly sourced group water schemes that have either already, or are intending, to request to be taken in charge by Uisce Éireann. While the Forum understands that any capital investment needed to bring these schemes up to the agreed basic standard (as per circular WSP01/16 agreed by the DHLGH, CCMA, UÉ and NFGWS in 2016) is being funded under the MARWP, UÉ must ensure they have sufficient operational resources in place to facilitate the ‘Take in Charge’ (TIC) and operation of these networks. The Forum would encourage further liaison between the DHLGH, NFGWS, CCMA and UÉ to quantify and plan the resources needed over the next 5 years.

### **4. Resourcing – assessments for urban wastewater**

The Forum recommends that the Opex budget includes adequate resourcing to carry out to complete the assessments, design and planning for the remaining wastewater treatment plants or networks which are impacting the 208 waterbodies, to progress Ireland in meeting its obligations of the EU Water Framework Directive.

The Forum recommends there that the Opex budget includes adequate resourcing to carry out the required assessments of the remaining shellfish waters, priority water for freshwater pearl mussel, stormwater overflows and drain area plans.