



**Submission to Uisce Éireann
on the
Water Services Strategic Plan Issues Paper**

November 2023

Introduction

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.

The Water Forum welcomes the opportunity to engage with Uisce Éireann through this stakeholder consultation on the Issues Paper of the Water Services Policy Statement (WSSP) 2050.

Background to the Issues Paper

The Water Services Policy Statement (WSSP) sets the policy framework that guides Uisce Éireann's future investment. This Issues Paper represents an initial step in developing the draft WSSP 2050; it summarises the key issues influencing Uisce Éireann and the services they deliver from now until 2050, where "An issue is an opportunity or threat, now or in the future, which has the potential to significantly affect Uisce Éireann and the services we provide to our customers." The issues identified in the Issues Paper will help define long-term objectives to be presented in the WSSP 2050.

Uisce Éireann have selected seven key issues that they believe could have the most significant influence on their services, customers and organisation over the period to 2050;

1. Climate Change
2. Awareness and Behaviours
3. Circular Economy
4. Digitalisation, Data and Cyber
5. Environment and Biodiversity Crisis
6. Legislation, Policy and Regulation
7. Existing Assets and New Approaches to Service Delivery

The Water Forum has made a number of recommendations on key issues for inclusion and consideration when preparing WSSP 2050, along with gaps within the proposed issue of 'Climate Change'.

Key Issues Influencing Long-Term Strategy

Consultation Question 1: Do you have any comments on the key issues we have identified?

Water Forum Recommendations

Gaps Identified in Key Issues / Suggestions for Inclusion within Proposed Issues:

1. **Climate Change; The Forum recommends that the key issue of climate change includes the following potential impacts from climate change on water services (availability, quality, treatment requirements).**

Temperature and Reduced Precipitation

- Increased temperatures and reduced precipitation cause severe degradation (drying) of organic rich soils, i.e., peatlands, resulting in accelerated peat decomposition and export of dissolved organic carbon and particulate organic matter. This will exacerbate disinfection by-product issues in drinking water, such as the formation of carcinogenic THMs, thereby increasing the treatment cost of drinking water and failure to meet EU obligations. Ireland has already the highest rate of THM exceedances in the EU, therefore careful planning for this future threat is required.
- Warmer temperatures can influence the occurrence, stability, reproduction, and mobilisation of pathogens including bacteria, viruses, and parasites in water sources (which differs depending on species). Climate change may therefore alter human exposure to waterborne pathogens through drinking water. This may influence the levels of water treatment required at different locations.
- Increasing temperatures may result in increased frequencies of cyanobacterial blooms, some of which produce cyanotoxins, which threaten the safe use of water for drinking. This may influence the levels of water treatment required at different locations.

Sea Level Rise

- Larger local sea level rise has been observed in Cork and Dublin (relative to the national average), with recent rates of relative sea level rise being twice the global average in Dublin^{1,2}.
- Saline intrusion in some coastal aquifers and estuaries may affect groundwater drinking water resources by increasing total dissolved solids concentrations, altering the biogeochemistry of the aquifers and increasing corrosion of buried infrastructure, with implications for water treatment.

2. Awareness and Behaviour

Water scarcity, water efficiency and a bottom-up understanding of water (source, treatment, supply) should be included as issues within awareness and behaviour.

¹ Shoari Nejad, A., Parnell, A.C., Greene, A., Kelleher, B.P., McCarthy, G. (2020) Recent sea level rise on Ireland's east coast based on multiple tide gauge analysis. Ocean Science Discussions, 1-26. DOI: www.doi.org/10.5194/os-2020-8

² . Nolan, G., Cusack, C., Fitzhenry, D. (Eds), (2023). Irish Ocean Climate and Ecosystem Status Report. Marine Institute, Galway, Ireland, pp 192

Consultation Question 2: Are there any other key issues we should consider?

Water Forum Recommendations for New Issues

1. Population Growth

The Forum recommends that population growth is included as a key issue for the WSSP, as it has the potential to significantly affect Uisce Éireann and the services it provide to our customers. The CSO have estimated a population growth for Ireland, where the largest projected change +41.2% over the 35 year period to 2051, with moderate projected change of +27.2%.

Census 2022 marked the first time in 171 years that the population of Ireland surpassed 5 million people. On Census Night, Sunday, 03 April 2022, the population of Ireland was 5,149,139. The figure increased by 387,274 people since April 2016, representing a total growth of 8.1% over the six years since Census 2016, or an annual average increase of 1.3%. This is almost double the annual average increase of 0.7% during the previous period 2011-2016. Since 2011, all regions have shown some level of population growth. The Dublin and Mid-East regions have seen the largest population increases of 5.9% and 5.1%, respectively. Regional projections for population growth also indicate that Dublin and the Mid-East regions will see the largest population growth, adding additional challenges for these regions which have significant water supply demand deficits³. This means that previous growth rate statistics for 2050 based on the 2016 census may need to be revised.

The provision and capacity of water and wastewater services will play a critical role in the provision of housing and regional development for growing populations and any revisions to the growth rate projections based on the 2022 census will need to be considered. The Eastern Region showed the largest increase in population in the latest census (up to 13% increase depending on county). Drinking water security in this region is of the greatest concern, given its reliance on unsustainably high levels of extraction from the River Liffey. Uisce Éireann need to ensure there is sufficient headroom for this demand in the future.

From the Population and Labour Force Projections 2017 – 2051 (CSO 2023) the largest population change is projected for the high migration and high fertility scenario M1F1 where the population is projected to grow by 1,953,300 (+41.2%) to 2051. This equates to an average annual rate of population increase of almost 0.8 per cent. Considering the data from the Census 2016 – 2023 shows an annual average increase of 1.3 % (i.e., 0.5% above the highest projected annual increase), planning for highest projected scenario M1F1 should be considered at minimum.

2. Transparency and Trust

The Forum recommends that Transparency and Trust are included as a key issue for as it has the potential to significantly affect Uisce Éireann and the services it provide to our customers.

(The Forum also recommends that Transparency and Trust should be included in the Long-Term Planning Approaches)

Uisce Éireann needs to build trust as it moves into position as a new single public utility and going forward into the future. There should be greater transparency and accountability across all aspects of Uisce Éireann's services including:

Information and Communications

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.”

³ [Regional Population Projections Results Overview - CSO - Central Statistics Office](#)

In a recent Water Service Customer Survey commissioned by the Water Forum, 54% of respondents stated that they would like more information from their water supplier. Uisce Éireann should ensure that customers have access to all the information required to keep them informed of upgrades or disruptions in their area, thus building trust in the service that Uisce Éireann provides.

Data and Monitoring

Making open-source information available for water supply services to build trust in the water utility and so that the public and stakeholders can make informed contributions to public consultation processes.

Project Details, Delivery and Timelines

More information needs to be available on project details and planned works (incl. assessments and design), including timelines for completion. Furthermore, the identification of what issue each project will address (e.g., RBMP issue, RAL issue etc) will give stakeholders and communities increased transparency around decision making processes and project prioritisation.

Initial Thoughts on Themes and Long-Term Planning Approaches for the WSSP 2050

Consultation Question 5: Do you have any comments on the approaches for long-term planning we have identified?

Consultation Question 6: Are there any other approaches we should consider?

Consultation Question 7: What examples of good practice long-term planning could we learn from?

Recommendations for New Long-Term Planning Approaches

1. Collaboration

The Water Forum recommends that the issue highlighted under Transparency and Trust in the section above be applied throughout Uisce Éireann's Long-Term Planning Approaches to ensure transparency and communications with customers to build long-term trust in their water service.