



**Submission to Uisce Éireann
on the
Draft Water Services Strategic Plan 2050**

July 2024

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 26 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 Water Services Strategic Plan 2050

The Water Services Policy Statement (WSSP) is Uisce Éireann's long-term strategic plan which is required to be prepared under the Water Services No. 2 Act 2013. This plan sets the policy framework which guides future investment for Uisce Éireann and outlines the proposed strategic direction for UÉ until 2050 and the actions they will implement to ensure sustainable public water services for Ireland in the face of significant challenges. Once approved, it will replace the existing WSSP from 2015, which covered the period from 2015 to 2040.

Uisce Éireann have set out the following 14 Strategic Aims that they believe will have the most significant benefit to their services, customers and organisation over the period to 2050.

Strategic Aims

1. Ensure Safe Drinking Water
2. Delivering reliable water supplies
3. Conserving our precious resources
4. Delivering for customers
5. Engaging with communities
6. Providing for growth
7. Protecting our water environment
8. Playing our part under the Water Framework Directive
9. Contributing to positive biodiversity
10. Achieving net zero carbon
11. Adopting circular approaches
12. Managing our assets
13. Gaining value from innovation
14. Securing long-term funding

There are an additional 35 Actions which have been proposed by UE to deliver on the above 14 Strategic Aims.

Water Forum Recommendations

The Forum welcomes the draft Water Services Strategic Plan 2050 and largely supports the proposed strategic objectives, aims and associated actions. Uisce Éireann's focus on water conservation and customer education and communication on water conservation measures is particularly welcome. The Water Forum would like to make a number of recommendations related to the Strategic Aims and specific Actions for inclusion in the WSSP 2050.

Question 1: In Section 4 we present our four Strategic Objectives. Do you have any comments on the Strategic Objectives and associated strategic aims and actions?

Strategic Aim 1: Ensure Safe Drinking Water

Action 1.3: Coordinate catchment management measures and champion nature-based solutions for improving source water quality

- The Forum recommends that more emphasis is placed on integrated catchment management and the need for engagement and collaboration for source protection in all catchments. This is essential to reduce the need for treatment and end of pipe solutions. The Forum suggests that Action 1.3 should be changed to *“Coordinate integrated catchment management measures in all catchments and champion community lead and other nature-based solutions for improving source water”*.

Strategic Aim 2: Delivering Reliable Water Supplies

Action 1.4: Implement and continue to review our NWRP, delivering improvements in water supply infrastructure to ensure resilient supplies into the future.

The Forum supports the need for having a robust water supply infrastructure and a resilient future water supply.

- The Forum recommends that development and planning for interconnected supplies and new sustainable water sources is given priority, particularly for water supplies in the Eastern and Midlands Region where there is currently limited capacity and resilience.
- The Forum recommends that in order for water sources to be sustainable there is a need to ensure all source water bodies are protected from over-abstraction.

The Forum welcomes that Uisce Éireann will be exploring opportunities for Rainwater Harvesting and the Circular Use of Water, complementary to nature-based solutions for stormwater management as part of the development of their Water Conservation Strategy under Aim 3 Action 1.7. However, the Forum considers that Regional and Community Rainwater Storage is critical to delivering future reliable water supplies.

- The Forum recommends that additional measures such as Regional and Community Rainwater Storage need to be implemented to mitigate against drought vulnerability and to secure future reliable water supplies under Uisce Éireann's proposed Water Conservation Strategy.

Strategic Aim 8: Playing our part under the Water Framework Directive

While the Forum supports the reference to the Water Framework Directive (WFD) as one of the fourteen Strategic Aims, the Forum recommends that the wording of Strategic Aim 8 needs to be strengthened to clearly outline UE's statutory obligations of the EU Water Framework Directive (as a

public authority) as outlined in the European Communities (Water Policy) Regulations 2003 (SI 722 of 2003, S.I. No. 272/2009 - European Communities Environmental Objectives (Surface Waters) Regulations 2009 and the Water Services Act 2007 (see relevant details of these regulations in Appendix 1 below). This would give the Water Services Strategic Plan a clear focus on addressing the 197 waterbodies that currently do not meet WFD objectives due to urban wastewater pressures.

- The Forum recommends that Strategic Aim 8 is updated to “Achieving our obligations under the Water Framework Directive as transposed into Irish law”.

Action 3.4: Protect and restore water bodies through collaboration

The Forum welcomes collaboration in terms of the open sharing of data and the development of shared catchment models that will be used to find the most cost-effective measures to meet waterbody objectives.

- The Forum recommends that the objective of this collaboration should be meeting the requirements of the WFD, in particular addressing the 197 waterbodies where urban wastewater pressures is a significant pressure.
- Where the WSSP states that there may be a small number of cases where meeting the WFD objectives would be disproportionately costly, the Forum recommends that further justification is provided here and to include details on what may happen in terms of remediating these waterbodies. The Forum recommends that there is more ambition to deal with these cases to deliver the best possible outcomes for water quality, as Ireland has an obligation to meet the requirements of the WFD, which will include dealing with these cases.

Strategic Aim 13: Gaining value from innovation

Action 4.8 Continue to develop foresight and horizon scanning capability

The Forum welcomes the adaptive planning approach to support long-term decision making.

- The Forum recommends that the most up to date data and models are used in terms of climate change forecasting and population growth projections for futures thinking and adaptive planning, particularly when it comes to water efficiency, energy targets and increased economic and housing demands.

[Question 2: In Section 2 we have identified the biggest challenges we think will influence how we deliver our water services 2050. Do you have views on these challenges?](#)

The Forum supports the approach and solutions the WSSP2050 has detailed for the challenges facing the water services to 2050, particularly in terms of nature-based solutions to restore and enhance water quality and improve climate resilience.

- The Forum recommends that an emphasis on water quality is included in the Climate Change challenge within Section 2, particularly in terms of the effects increased temperatures and reduced precipitation will have on water quality, such as increased trihalomethanes (THMs), manganese, pathogens and cyanotoxins.

Question 3: In Section 8 we outline our approaches to meeting long-term challenges. Do you have any comments on these?

The Forum commends UÉ's commitment to collaborate with stakeholders to achieve the best environmental outcomes, including the open sharing of data with stakeholders and the development of shared catchment models to assess measures to meet WFD objectives.

- The Forum recommends that open-source data is also made available to the public in a timely manner to enhance transparency and to make informed contributions to public consultations.
- For long-term transparency the Forum also recommends that specific commitments should be in place to make project details, timelines and expected outcomes available to stakeholders and the public in a timely manner, as well as the requirements and compliance with the urban wastewater treatment Directive or the Water Framework Directive.
- The Forum believes that the WSSP2050 contains a lot of industry jargon that may not be understood by most water consumers or local communities. The Forum recommends that any engagement or collaboration with local communities and consumers needs to be in plain English to build trust between these communities and UÉ.
- The Forum is also of the view that an implementation plan should be developed for the many actions contained within the Water Services Strategic Plan together with the necessary governance arrangements needed to ensure that the actions are implemented in a timely and transparent manner.

The Water Forum welcomes the engagement with Uisce Éireann through this public consultation on the Water Services Policy Statement (WSSP) 2050.

If Uisce Éireann would like to contact the Water Forum to discuss any of the recommendations further, please contact Donal Purcell (Senior Executive Officer) at the following email address: donal@nationalwaterforum.ie

Appendix 1

Table 1. Uisce Éireann's national statutory obligations of the EU Water Framework Directive as transposed into Irish law via the European Communities (Water Policy) Regulations 2003 (SI 722 of 2003, S.I. No. 272/2009 - European Communities Environmental Objectives (Surface Waters) Regulations 2009 and the Water Services Act 2007. Uisce Éireann is a public authority in the context of the Water Framework Directive (2000/60/EC), referred to below as 'the Directive'.

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| <p>Under the European Communities (Water Policy) Regulations 2003 (SI 722 of 2003);</p> <p>It shall be the duty of every public authority to —</p> <p>(a) exercise its functions in a manner which is consistent with the provisions of the Directive and which achieves or promotes compliance with the requirements of the Directive;</p> <p>(b) take such actions as may be appropriate in the context of its functions to secure compliance with the Directive and with the provisions of any river basin management plan made, and any programme of measures established, in accordance with these Regulations;</p> |
| <p>Under the S.I. No. 272/2009 - European Communities Environmental Objectives (Surface Waters) Regulations 2009;</p> <p>A public authority shall not, in the performance of its functions, undertake those functions in a manner that knowingly causes or allows deterioration in the chemical status or ecological status (or ecological potential as the case may be) of a body of surface water.</p> |
| <p>Under the Water Services Act 2007</p> <p>(2) Subject to regulations made under subsection (3), a water services authority may provide water services or supervise the provision of water services by other persons, in accordance with any prescribed standards, for domestic and non-domestic requirements in its functional area, taking full account of the following aspects of public policy, namely:</p> <p>(b) protection of human health and the environment</p> <p>(g) sustainable management of water resources</p> <p>(k) a river basin management plan or a programme of measures under the EU Water Framework Directive</p> <p>(6) In drafting or reviewing a water services strategic plan, the water services authority or water services authorities concerned shall have regard to the proper planning and sustainable development of its or their functional area or areas and in particular shall have regard to the provisions of—</p> <p>(d) a river basin management plan or a programme of measures under the EU Water Framework Directive for the area to be covered by the water services strategic plan, or for any other area that could affect that plan</p> |