



Water Forum Submission to the Department of Housing, Local Government and Heritage following the workshop on the Significant Water Management Issues Workshop for the 4th Water Action Plan

5th November 2025

Background

The Department of Housing, Local Government and Heritage (DHLGH) held a workshop on the Significant Water Management Issues (SWMI) for the 4th Water Action Plan on the 24th October 2025. The DHLGH invited the Water Forum Chair, Dr. Matt Crowe to present at the SWMI Workshop on *'An Fóram Uisce's vision for the 4th Water Action Plan, including engagement and participation in the fourth cycle'*.

In advance of the workshop, the Forum's Catchment Management Standing Committee developed a background paper on the Forum's vision for the 4th cycle, which was presented by Matt Crowe at the workshop. The Forum has now developed this paper into a submission for consideration by the DHLGH for the development of the draft SWMI for public consultation later this year.

As outlined in the Water Services Act, the Forum has a statutory role to advise the Water Policy Advisory Committee on the development and implementation of Ireland's River Basin Management Plans.

What we know

The Forum acknowledges that there have been advancements in governance, resourcing and targeted action since the 1st and 2nd cycles. Furthermore, the Forum understands there has been a significant amount of 'figuring out' and developing and piloting new plans in the 3rd Water Action Plan which are in their infancy, in particular the sectoral

action work plans, catchment management work plans and the catchment community fora.

Despite this, the Forum is concerned that progress towards meeting the objectives of the Water Framework Directive (WFD) is slow, with repeated delays in policy and implementation.

As is clear from the latest EPA Water Quality Report, targeted actions can lead to improved water quality. This highlights the need to further increase targeted actions for the 4th cycle. The EPA Report also illustrates that while we are seeing improvements in some areas, it is being offset by deterioration in other areas. The Forum emphasises the need to strengthen protect measures in the 4th WAP to avoid a similar pattern and shift the trend to overall improvement in water quality for future water quality assessments.

A Vision for Stakeholder Engagement and Participation

The Forum recognises the extensive engagement with the DHLGH during the 6-month public consultation of the draft 3rd River Basin Management Plan. The Forum engaged with DHLGH officials in relation to the overall process, governance and programme of measures. In addition, the Forum engaged with sectoral leads in relation to individual pressures. The Forum subsequently made 106 recommendations in its original submission on the draft 3rd WAP (March 2022).

Following the consultation the Forum had numerous engagements with the DHLGH in relation to the evolving Programme of Measures (between March 2022 and June 2024) and subsequently focused on 20 specific recommendations in relation to an outcomes-based approach, governance, public participation and the top 4 pressures (agriculture, hydromorphology, forestry and urban wastewater). The Forum acknowledges that significant changes were made to the 3rd WAP following input from Forum members, where the majority of the 20 specific (focused) recommendations were incorporated fully into the final plan. The Forum is of the view that this engagement strengthened the 3rd Plan, increasing the ambition and accountability across governance structures and pressure owners. **The Forum would welcome a similar engagement process for the 4th cycle.**

A Vision for Implementation

The Water Forum calls for **a relentless focus on implementation** for the 4th Cycle, with an increase in both targeted actions and protection measures. The Forum acknowledges that the new plans and initiatives of the 3rd cycle – the Sectoral Action Work Plans (SAWP), the Catchment Management Work Plans (CMWP) and the Catchment Community Fora (CCF) are only started or in the piloting phase and would like to see these evolve and improve into the 4th cycle.

The Forum calls for the **timely publication of 4th WAP** to get back on track with RBMP cycles. It is essential that the delays in implementation for the 2nd and the 3rd cycle are not encountered for the 4th plan. Similarly, the 4th Cycle development should not hold back or interfere with 3rd Cycle implementation, whereby a twin track approach is needed, supported by the Programme Delivery Office.

The Forum highlights the need for **agility** for the remainder of the 3rd cycle and into the 4th plan, where transparent tracking of actions will be critical to assess if actions are working, and more importantly not working so we can change course quickly. Granular tracking of actions will also help to identify barriers for implementation at an early stage (e.g. funding, administrative capacity, policy delays).

The current tracking of actions for the 3rd WAP shows that 18% of actions are delayed, another 2% at risk of delay and a further 13% not scheduled. It is important to identify what are the causes of these delays to inform the 4th cycle and put in the place the necessary resources to prevent similar delays happening in the future.

The Forum recommends that implementing bodies and sectoral leads carry out a review of what resources are required to successfully implement the 3rd WAP, which should inform the resource requirements for the 4th cycle. In particular, the staffing resources within the Department and leading agencies/bodies to support the implementation of the 4th plan should be identified and secured.

Sectoral Action Work Plans

The Forum notes that 7 of the 10 SAWP have only recently been published, with 2 being finalised and 1 not yet started. The Forum has concerns with the delay in publication of these plans.

Uisce Éireann (UWW/Drinking Water Source Protection)	Finalised
NFGWS (Drinking Water Source Protection)	Finalised
Peat (Bord na Móna)	Finalised
DHLGH (Hydromorphology)	Finalised
IFI (Hydromorphology)	Finalised
OPW (Hydromorphology)	Finalised
Forest Service (Forestry)	Finalised
DAFM (Agriculture)	Awaiting final revisions
NPWS (Invasive Alien Species)	Development on hold
NPWS (Peat)	Awaiting final revisions

Table 1. Progress on the publication of Sectoral Action Work Plans to date, taken from presentation from Marie Archbold, DHLGH at the SWMI workshop.

The Forum is aware that the first iteration of the SAWP is mainly summarising and collating what work each sector is doing to deliver on WFD objectives. The Forum calls

for **increased ambition in SAWP** for the 4th cycle, where sectors are tasked to increase their efforts to reduce the number of waterbodies at risk from that pressure.

The Forum re-emphasises the recommendation it made for the 3rd cycle (and which is included in the Plan) – that the longer-term objective of each SAWP should be that the sector is no longer a significant pressure on water quality and is actively contributing to the protection of water quality in catchments and water bodies where the sector is active. The Forum calls for increased focus by sectors on ‘protect’ measures in the 4th cycle.

The Forum is of the view that there should be greater accountability of the sectors to meet deadlines for publishing and reviewing their SAWP, and to meet their target objectives, to prevent delays in implementation of the WAP. The Programme Delivery Office and the Water Policy Advisory Committee should play a leading oversight role to prevent delays in sectoral plans and implementation.

To support better coherence and alignment in the delivery of SAWP, there should be an opportunity for sectoral leads to come together to discuss progress and obstacles for implementation.

Catchment Management Work Plans

The Forum welcomes the catchment management approach currently being piloted as part of the 3rd cycle and is of the view that there is significant potential in these plans to change water quality trends to the right direction. The Forum therefore calls for upscaling and implementation of the CMWP to all 46 catchments early in the 4th cycle.

This will require high ambition and oversight to ensure that all sectors, agencies and communities can work together to implement targeted actions and protect measures for waterbodies within each catchment. The Forum highlights the need for **clear roles and responsibilities to ensure transparency and accountability for action in each catchment**. The Forum is aware that the Programme Delivery Office will have a key oversight role in this area. Data sharing between agencies and implementing bodies will be critical to identify what measures are resulting in water quality outcomes.

Resourcing for the implementation of the CMWP will be critical; the Forum recommends that **the DHLGH review the resource requirements annually** to ensure that progress is not restricted due to lack of capacity or resources.

The Forum would like to see clear interconnectivity between the SAWP, the CMWP and the Catchment Community Fora (CCF) during the 4th cycle.

Catchment Community Fora and Public Participation

In its submission to the 3rd RBMP, the Forum called for increased public participation to support implementation of the 3rd cycle. The Forum welcomes the initiative for the

establishment of Catchment Community Fora (CCF) in the 3rd WAP, which are currently being piloted in 5 catchments.

The Forum is concerned with the delays encountered in the piloting exercise and emphasises the need to progress with the establishment of the CCF at pace to allow for them to develop and evolve in tandem with the catchment management work plans. The Forum calls for the roll out of the CCF in all 46 catchments to support public participation in the 4th cycle, along with setting realistic expectations of what the CCF can contribute to the implementation of the 4th plan.

Resourcing for the CCF will be critical for their success which should include a ringfenced funding source for the CCF without administrative obstacles.

The Water Forum recommends that the CCF business case (to identify future resource requirements) be completed by mid-2026 to allow funding for wider rollout in 2027 and that any resource gaps be identified early and communicated to the CCF Implementation Advisory Group and the Department of Housing, Local Government and Heritage. The Forum also calls for multiyear funding for the LAWPRO Catchment Support Fund to allow for longer term community projects to be delivered. -

The Forum emphasises the need to harness expertise and interest from existing networks and groups in different catchments.

Outside of the CCF, the Forum would like to see more involvement with the wider public to support the implementation of the 4th plan and calls for a national campaign on water quality and the value of protecting our water environment.

In 2025 the Water Forum commissioned a national survey to gain an understanding of what people know about their local waterbodies and what information and supports are needed to help individuals get involved in protecting waterbodies within their communities. Some key learnings from this survey include:

1. Most people feel a personal connection to their local waterbodies but this doesn't translate to awareness or action.
2. Technical language and scattered sources of information create barriers to peoples understanding of water health, highlighting a need for public guidance.
3. Understanding on how to access water quality information is low, but there is an appetite for accessible, centralised online information sources.
4. Awareness of local water groups and funding initiatives is extremely low, highlighting a knowledge gap which can be improved.
5. Lack of information, time constraints and perceived costs were highlighted as challenges to getting involved, indicating more may be persuaded to take part if activities are local, flexible and low-cost.

The Forum recommends that the 4th plan should include an action to develop a communications strategy to educate and build awareness with the general public. The Forum would be pleased to support the DHLGH in the development of this communications strategy. Public access to this information should be reviewed and improved for ease of access and understanding of water quality information for the general public. Each CCF, once established should identify means of engaging with the wider public within their catchment to build awareness and interest in local water initiatives.

Policy Coherence

The Forum calls for improved coherence of national policies to support the implementation of the 4th cycle. This will require a policy mapping exercise to assess how aligned (or misaligned) relevant national policies are with the requirements of the WFD. This would identify both co-benefits, where policies and associated actions could have co-benefits for water, and vice versa. It would importantly highlight where national policies conflict with the WFD, and where trade-offs and solutions to address them will need to be identified.

The Forum recommends that there should be a dedicated staff appointed to the DHLGH to carry out policy mapping and engage with different government departments to improve policy coherence going forward. Furthermore, there should be closer alignment and working relationships between co-ordinators of water, climate and biodiversity plans, which could identify synergies and opportunities to maximise resources for measures with multiple co-benefits.

The Water Policy Advisory Committee (WPAC) which has cross departmental representatives should be used as a platform to proactively tease out conflicting national policies inhibiting progress to meet WFD objectives.

In the draft RBMP for the 3rd cycle, there was an action to develop an interdepartmental, comprehensive financing strategy to support the implementation of measures to deliver on the ambitious Water, Climate and Biodiversity objectives. This action was removed in the final plan. The Forum calls for this action to be included in the 4th Plan, to support policy coherence across water, climate and nature and improve resource efficiency to deliver on national and EU targets.

In addition, the Cabinet Sub-Committee on Water Quality, whose current focus is to retain the Nitrates Derogation, should have a wider scope to meet WFD objectives, thereby increasing the visibility of water on the political agenda.

Response to Pollution Events

The recent fish kill on the River Blackwater highlighted there are a number of obstacles preventing a coordinated and timely response to a water pollution event. This will need to be addressed as a matter of urgency. The Forum recommends that the DHLGH lead a review on the inadequacies in response to water pollution events, assessing the roles and responsibilities of all agencies that have a role in emergency response to pollution events. This review should identify any obstacles (legislative, capacity, etc) preventing timely identification of the source of a pollution incident.