



# Water Forum Submission to the Commission of Regulation of Utilities on the Draft Determination on Uisce Éireann's revenues for Revenue Control 4 (2025-2029)

**21<sup>st</sup> January 2026**

## Introduction

The Water Forum welcomes the opportunity to respond to the public consultation of the Commission for Regulation of Utilities (CRU) on the Draft Determination on Uisce Éireann's revenues for Revenue Control 4 (RC4). The Forum welcomes the briefing on the consultation documents by the CRU to the Water Forum on the 12<sup>th</sup> December 2025.

As outlined in the Water Services Act 2017, the Water Forum has a statutory advisory role to the CRU and to Uisce Éireann, including;

- To make recommendations to Uisce Éireann (Irish Water) in relation to the performance by Uisce Éireann in its functions, and when requested in writing in that behalf by Uisce Éireann, on any policy document prepared by Uisce Éireann
- To advise and provide observation to the Commission for the Regulation of Utilities (CRU) in relation to the performance by Uisce Éireann in its functions, and when requested in writing in that behalf by Uisce Éireann, on any policy document prepared by Uisce Éireann.

## Water Forum Recommendations – Key Themes

1. Outcomes based approach
2. Institutional capacity
3. Leakage Targets
4. Domestic Metering
5. Wastewater
6. Major Projects
7. Climate Change Risks to RC4 Investment
8. Performance Assessment Framework
  - 8.1 Customer Service
  - 8.2 Stakeholder Engagement
  - 8.3 Community Engagement
  - 8.4 Security of Supply

## Water Forum Recommendations

### 1. Outcomes based approach to deliver RC4

This section responds to draft Determination Consultation, Section 5 Review of Forecast Capital Expenditure, Question 7: What are your views on Uisce Éireann’s proposed RC4 delivery obligations (presented in Table 12)?

The Forum is of the view that the presentation of RC4 in the CRU draft Determination Document indicates that Uisce Éireann's planning processes are stronger on output definition (infrastructure delivery) than on outcome specification (service improvements and benefits realized).

Output based units are based on the tangible and measurable actions or products (e.g. number of treatment plants) resulting from specific activities. Outcome based units are units based on the ultimate or intermediary benefits delivered by the interventions (reliable high quality drinking water delivered; or negative health impacts avoided). Outcomes focus on changes or benefits that result from achieving the outputs.

**The Forum recommends that the CRU and Uisce Éireann put a stronger emphasis on delivering outcomes during the implementation and monitoring of RC4, clearly differentiating between outputs and outcomes.** The distinction between outputs and outcomes is particularly important for building trust with the public, ensuring that public money is being spent for public good. For example:

#### Output-focused elements identified:

- Sewer network rehabilitation programme delivery
- Meter replacement and installation (domestic and non-domestic)
- Number of water treatment plants upgraded or constructed
- Kilometers of pipe rehabilitated or replaced
- Number of housing connections delivered

- Major Projects (WSP and GDD) that lack delivery obligations and defined outputs post-RC4

Outcome-focused elements identified:

- Leakage reduction targets and net water savings
- Security of supply improvements across water resource zones
- Customer service interruptions reduction
- Sewer flooding incidents reduction
- Environmental performance compliance (WFD, UWWTD)
- Water quality and public health protection
- Energy efficiency improvements
- Climate resilience and adaptation
- Wastewater treatment efficiency

**Specifically, the Forum recommends that:**

**Outcome-based performance framework:** Uisce Éireann should develop and implement a **comprehensive outcome-based performance measurement framework for RC4** that clearly links infrastructure outputs (pipes, plants, meters installed) to service outcomes (water quality, supply reliability, environmental compliance, customer satisfaction, public health benefits). This framework should establish clear causal pathways showing how outputs generate intermediate and ultimate outcomes.

For example, Table 12 in the Draft Determination Report (39 Delivery Obligations) which presents the number of water treatment plants or wastewater treatment plants to receive investment – should also present what the outcome of this investment is expected to have, such as environmental protection through the removal of wastewater as a significant pressure in a particular waterbody or public health through the removal of a water treatment plant from the EPA’s remedial action list.

**Balanced scorecard approach:** The CRU should develop a balanced scorecard methodology for Uisce Éireann that tracks both output delivery (infrastructure constructed) and outcome achievement (service improvements realized) across all major investment categories. This would ensure accountability extends beyond construction completion to actual benefits delivered.

**Outcome-based incentives:** to steer towards delivering on outcome-based metrics, the incentive mechanisms proposed by the CRU could be weighted more heavily toward outcome achievement rather than output delivery alone. Financial and reputational incentives for the utility should reward Uisce Éireann for delivering measurable improvements in water quality, supply security, environmental performance, and customer service, not merely for infrastructure construction milestones.

**Ex-post outcome evaluation:** The CRU should require ex-post evaluation studies for major investment programmes to quantify actual outcomes achieved (leakage reduced, supply security improved, environmental compliance achieved, public health benefits realized) compared to predicted outcomes, enabling learning, continuous improvement and building public trust.

**Transparency in outcome reporting:** Annual reporting requirements should clearly distinguish between output delivery and outcome achievement, with explicit reporting on outcome gaps where infrastructure outputs failed to deliver expected service improvements or benefits.

This shift toward outcome-based accountability would strengthen the regulatory framework, improve value for money for customers, and ensure that the substantial RC4 investment programme delivers tangible improvements in water services, environmental performance, and public health outcomes.

## 2. Institutional capacity to deliver RC4

This section responds to draft Determination Consultation, Section 5 Review of Forecast Capital Expenditure, Question 7: What are your views on Uisce Éireann’s proposed RC4 delivery obligations (presented in Table 12)?

The CRU consultant, Arcadis, in its review of RC4 concluded that “Uisce Éireann’s investment planning is reasonable and structured, that the system for prioritisation is fit for purposes, that Uisce Éireann’s investment addresses the most critical needs, and that the project lifecycle framework provides a clear process for scoping and costing projects and good governance”. The CRU also acknowledged that Uisce Éireann has made progress in its capital planning during RC3 and the organisation is ‘maturing’ as a single utility.

In review of RC3, Scottish Water acted as an independent technical advisor to the CRU, which indicated that Uisce Éireann had *limited operational capacity to deliver its ambitious investment programme*, highlighting weaknesses in project delivery, efficiency, and organisational maturity. While it is acknowledged that the organisation has met 12 of the 14 improvements identified by Scottish Water (indicating improvements), it is not clear if the same benchmarking exercise on institutional capacity was carried out to meet the higher investment and scale of RC4.

In review of RC4, Arcadis conducted a series of deep-dives for 34 projects and programmes selected to be representative of the wider RC4 portfolio which identified the need for a moderate but strengthened regulatory challenge to ensure greater value for customers. Despite acknowledging that Uisce Éireann has matured as an organisation, the consultation material does not clearly confirm whether it has sufficiently matured to deliver on the increased investment of RC4, which is 63% higher than RC3.

Arcadis also assessed Uisce Éireann’s capital maintenance, benchmarking it against English and Welsh water companies. The Forum is of the view that this benchmarking exercise should also be carried out for comparative large scale capital infrastructure delivery (including utilities and other types of infrastructure, e.g. ports, road, rail) to ensure they have the ability and the capacity to

deliver on RC4. This benchmarking exercise should be compared with large scale capital infrastructure delivery beyond the UK, comparing Uisce Éireann to international best practice (i.e. the ‘best in class’ examples), and drawing from this coherent guidance based on best practice

To clearly identify areas for institutional strengthening, **the Forum recommends that an additional suite of benchmarking is performed across all components that affect Uisce Éireann’s internal operational abilities to prioritize and efficiently deliver RC4 in a transparent and accountable manner.**

Specifically, the benchmarking could assess:

- Organisational capacity relative to the scale of the RC4 investment programme
- Data management systems maturity and quality
- Project appraisal and options analysis methodologies
- Contract management and procurement capabilities
- Performance monitoring and reporting systems (of the utility, not individual staff)
- Risk management frameworks and tools
- Technology adoption for asset management and capital delivery

This benchmarking will provide a baseline for measuring Uisce Éireann's progression from current operational maturity to the level required for efficient RC4 delivery. This recommendation acknowledges that while Uisce Éireann has established strategic planning frameworks, operational development is required before the utility can reliably quantify and report on progress. The gap between framework development and operational capability should be explicitly addressed through capacity building, not merely through enhanced reporting requirements.

Furthermore, benchmarking institutional capacity should not only be done for the delivery of RC4 as is currently presented, it should also include the additional responsibilities Uisce Éireann have been given in relation to supporting increased housing targets and the proposed role of Uisce Éireann in the new Small Wastewater Discharge Regulations for rural areas. Benchmarking of the organisation should assess if there is flexibility within the organisation to adapt to new responsibilities which are given to Uisce Éireann to meet housing or growth.

The aim here is to improve overall operational resilience and effectiveness to deliver on key outcomes. In response to Consultation Question 3 (and partially Question 22), once established, these metrics could be used as additional information to be provided by Uisce Éireann to the CRU as part of the annual update.

### 3. Leakage Targets of RC4

This section responds to draft Determination Consultation, Section 5 Review of Forecast Capital Expenditure, Question 7: What are your views on Uisce Éireann’s proposed RC4 delivery obligations (presented in Table 12)?

The Forum shares the CRU’s concern that Uisce Éireann failed to achieve key performance targets in relation to leakage during RC3. In the review of RC4, the CRU’s consultants note the proposed leakage target appears ambitious, and that it is unclear how it will be achieved. Arcadis note that supporting data is still being developed, with no integrated plan outlining how various interventions will contribute to the targeted leakage reductions. Deliverability was identified a key concern due to ongoing resourcing challenges within Uisce Éireann’s Leakage Team, which have persisted since RC3.

The Forum is particularly concerned that Uisce Éireann has informed the CRU (July 2025) that they will seek to significantly revise the RC4 leakage target from the RC4 submission “*to a substantially lower leakage reduction target, while maintaining the same level of expenditure.*”

**The Forum is of the view that the leakage targets should not be reduced as they are deemed ‘too ambitious’ but instead a review should be carried out as to why leakage targets were missed and why they are expected to persist. The Forum recommends that Uisce Éireann identify how they can overcome these obstacles and how it intends to front-load the delivery of this target.**

Under the EU Recast Drinking Water Regulations, Member States are now obliged to monitor and report leakage rates, and to identify and act on systems with excessive leakage. Ireland’s leakage rates (average 37%) are considerably higher than the European average (23%), therefore we are not in a position to reduce our leakage targets.

Lower leakage rates are not only necessary for sustainable management of our water resources, they are also essential for building public trust and buy in for water conservation initiatives and projects such as the Water Supply Project. The Forum is of the view that Uisce Éireann should also be communicating with local communities when they are fixing leaks in an area, this would not only increase awareness of the utilities efforts to reduce leakage but also prevent people becoming frustrated with local disruptions where they do not know the overall benefit.

### 4. Domestic Metering Investment

This section responds to draft Determination Consultation, Section 5 Review of Forecast Capital Expenditure, Question 7: What are your views on Uisce Éireann’s proposed RC4 delivery obligations (presented in Table 12)?

There is a target to replace 280,994 meters during RC4, 43% of which are domestic meters. Uisce Éireann estimate most of this target will be from replacing existing meters.

The CRU’s consultants challenge the scale of the metering programme as provided in the RC4 Investment Plan. Arcadis question the value for money of the large domestic component (43% of proposed meters) in the absence of domestic charging. Additionally, Arcadis raise concerns

about the high risk of under-delivery and/or overspend, without clearly understanding the need and outcome. The CRU have proposed that Uisce Éireann consider “deprioritising domestic meter installation/replacement, and either reduce allowed expenditure, reallocate funding to Find and Fix or reallocate funding to other or existing projects”.

Arcadis notes that domestic meters are not used for revenue purposes, and so only informs part of Uisce Éireann’s leakage monitoring. Arcadis find the proposed level of domestic meter replacement as unjustifiably high to achieve this objective.

**The Water Forum has concerns with the CRU’s proposal to deprioritise domestic meter installation/replacement.** Metering is essential for many aspects of sustainable water management, from identifying leaks and high-water users, to understanding demand in different water resource zones to monitoring behaviour and impact of water conservation initiatives during dry or drought conditions. Generally, **the Water Forum supports the need for significant investment in metering, including for domestic meters.** This is not a precursor to water charges, but as a tool for sustainable water management. Before any decisions to reduce domestic meter installation/replacement, **the Forum calls for Uisce Éireann to present a cost benefit analysis of the wider benefits of domestic meters (to include benefits for Uisce Éireann, broader societal benefits and specific consumer benefits),** which should present the value for money of the high investment. This should present more context on the need case for meter replacement or installation, for example is it to replace meters installed over 10 years ago or to install meters in new locations. Instead of ‘deprioritising’ investment in domestic meters, an evaluation of how Uisce Éireann can improve the value for money for this investment should be presented, example through district meters, water conservation, leak detection or managing demand during peak times or in crisis. **If it is found to be the case that replacing that quantity of domestic meters does not represent value for money, reallocation of that funding should be ringfenced for other water demand reduction projects with a better cost-benefit.**

**Following this, if there is a decision to reduce investment in domestic meters, the Forum recommends that it is still prioritised in areas where there are known supply demand balance deficits or foreseen deficits, to support sustainable management of water in these areas.**

The Forum in its position on the 2024 Programme of Government, called for the implementation of the excess water usage charge for public water consumers, a commitment which was contained in the previous Programme for Government but not implemented. The Forum is still of the view that this should be implemented by the Government – not as a revenue source but as a measure to support water conservation and personal responsibility for the detection of household leaks. To minimise the political conflict on this topic, the Forum recommends that this should be called a ‘Fair water-use policy’, where water is charged only when it is above a high-use threshold. This would require replacement and installation of domestic meters, which should also be considered when finalising metering investment needs. The Forum is of the view that as part of the new connection process by Uisce Éireann, there should be a requirement that all new connections require domestic meters to support sustainable management of water resources.

## 5. Wastewater Performance

This section responds to draft Determination Consultation Question 3, 4 and 7:

Question 3: Do you have any comments in relation to measures that can be introduced for the benefit of customers and/or the receiving environment?

Question 4: Do you have any comments in relation to the above proposals and the pace of information developed and published by Uisce Éireann in relation to National and Regional Wastewater drainage services and the associated plans?

Question 7: What are your views on Uisce Éireann's proposed RC4 delivery obligations (presented in Table 12)?

The Forum shares concerns with the CRU that three out of four under-performing deliverables relate to the wastewater sector, which has been a persistent challenge throughout RC3.

When assessing institutional capacity, it is recommended that a separate assessment is presented for water and wastewater, to get a clear indication of capacity to deliver on both. Due to ongoing inefficiencies in wastewater, **it is likely that separate performance frameworks, monitoring, and capacity building initiatives will be identified and required for wastewater services.**

It is not clear from the consultation material what RC4 will deliver for Ireland's River Basin Management Plan or how many waterbodies at risk from urban wastewater will be addressed. Arcadis notes that the scope of work required for Ireland's River Basin Management Plan is extensive and Uisce Éireann has not fully completed an initial assessment of all sites to assess the impact and scale of the need. **The Forum is concerned with the slow progress towards complying with the Water Framework Directive and calls for increased ambition to reduce urban wastewater as a pressure on Ireland's waterbodies.**

The Forum recommends that the CRU should also assess transparency and accessibility to Uisce Éireann wastewater data, whereby the public should have easy access to regional wastewater capacity, local information on compliance with the EU Urban Waste Water Treatment Directive and compliance with the Water Framework Directive.

## 6. Major Projects

This section responds to draft Determination Consultation, Section 5 Review of Forecast Capital Expenditure, Question 7: What are your views on Uisce Éireann's proposed RC4 delivery obligations (presented in Table 12)?

And

RC4 Regulatory Framework Consultation, Section 3.6 Annual Review Investment, Question 6: Do you have any views on the proposed regulatory framework to annually monitor and assess progress on (i) Major Projects, (ii) Reactive and Maintenance work and (iii) Early-Stage Projects?

Major Projects of RC4, specifically the Water Supply Project (WSP) and the Greater Dublin Drainage Project (GDD), represent 21% of the RC4 Investment Plan, yet they are not included in the list of delivery obligations and associated targets of RC4. The Forum supports the CRU's proposal to take a targeted approach to reporting arrangements on these projects as neither of the Major Projects (GDD, WSP) will produce an output within the lifetime of RC4. This is important to ensure Uisce Éireann remains accountable.

However, the Forum is of the view that enhanced monitoring alone is insufficient without corresponding improvements in Uisce Éireann's project management capabilities and systems. Given the scale and the significance of these Major Projects and the need for advanced planning, **it is recommended that CRU provides more structured guidance (mechanisms and methodologies in addition to those in the Infrastructure Guidelines) that will be used to plan, execute, track and monitor these Major Projects** through the enhanced Capital Investment Planning reporting processes.

The Forum also recommends that as part of annual monitoring of progress of these projects that they are annually reviewed to ensure they are fit for purpose in the context of future population and economic growth, and resilient in the context of future climate change.

## 7. Climate change risks to RC4 Investment

This section responds to RC4 Regulatory Framework Consultation, Appendix 4, Question 25: Do you have any views that you would like to raise concerning any matter raised in this paper?

It is noted that the public/customer impact statement refers to accelerating climate change as one component underpinning the need for sustained investment to strengthen the water services, expand treatment of supply and improve security of supply and resilience. However, no evidence has been provided by the CRU in the evaluation of Uisce Éireann's ability to adapt the capital investment plan to model and meet these additional risks and impacts. **The Forum recommends that climate change modelling and metrics are embedded in Uisce Éireann's strategies and investment prioritisation processes.** The Forum made a similar recommendation in its submission to the Stakeholder Consultation on the Water Supply Project, calling for a regular assessment of the project against updated climate models, to ensure major projects are fit for purpose, and to identify areas which might require change or additional, supporting measures, at an early stage.

## 8. Performance Assessment Framework (PAF)

This section responds to RC4 Regulatory Framework Consultation, Section 5.3 Uisce Éireann's proposals for enhanced monitoring Question 7 and 8:

Do you have any comments on Uisce Éireann's proposed RC4 PAF incentives?

Do you have any comments on the CRU's proposed RC4 PAF incentives?

The Performance Assessment Framework (PAF) was established in 2016 to provide a basis for the assessment of Uisce Éireann's overall performance against a number of defined metrics across five categories: customer service, environmental performance, water supply – quality of service, security of water supply and wastewater (sewerage) service.

For RC4, Uisce Éireann proposes to retain all six of the PAF metric categories established during RC3, including:

1. customer service,
2. security of water supply,
3. quality of water supply,

4. sewer incidents,
5. environmental performance, and,
6. energy & emissions.

The CRU supports these six PAF categories for RC4 and is of the view that they provide a comprehensive assessment of utility performance. The Water Forum also supports these six PAF categories but recommends that ‘environmental performance’ should be presented as environmental protection, whereby there are clear targets for Uisce Éireann to meet various environmental legislation, particularly the Water Framework Directive and reducing the pressure of urban wastewater on Ireland’s waterbodies.

### *8.1 Customer Service Metrics*

Table 10 in the Draft Determination Document presents the customer service metrics proposed for RC4:

- Ease of telephone contact: Speed of telephone response
- Ease of telephone contact: Call abandonment rate
- Ease of telephone contact: First call resolution
- Billing of metered customers
- Response to billing contacts
- Response to complaints
- Unresolved complaints upheld by the CRU CCT
- Customer Satisfaction Survey
- Stakeholder Engagement – establish a stakeholder engagement panel

Overall, the Forum supports the CRU’s proposals for small improvements in some of the customer service metrics. In a national survey commissioned by the Water Forum in 2025, only 35% of the nationally representative sample reported their customer service experience with Uisce Éireann ‘good’, or ‘quite good’, reflecting a need for improvement across various elements of customer service. The Forum is of the view that these metrics should also be presented with outcomes. For example, improvements in ease of contact and response to complaints should coincide with an increase in public trust in Uisce Éireann as a water supplier.

**The Forum is of the view, however, that customer service metric should better reflect the wider interests of Uisce Éireann consumers, which should include building trust in the supplier and building knowledge and awareness on the values of water.** The Water Forum commissioned a national survey in 2023 to learn about how the public understand and value their drinking water – one of the findings was that only 46% of public water consumers had some knowledge about where their water came from or how it is treated. By comparison 82% of those connected to group water schemes consider themselves knowledgeable, illustrating a stronger connection to their water source. This reflects a need to build awareness of how water is taken from the environment and undergoes significant treatment before it is distributed to our homes, with the anticipated outcome that the public value their drinking water more.

In 2025, the Forum commissioned another national survey to gauge views on the interests of public water consumers; one of the findings was that only 41% of the national sample stated they were quite / very satisfied with their drinking water quality, despite a 99.7% compliance of public drinking water with EU Drinking water standards. **The Forum therefore recommends that the CRU add a new metric on public awareness raising to this customer service metric**, where initiatives to educate the public about the source and quality of their drinking water is reported on, with the outcome to build trust in their water supply.

The Forum is of the view that an additional customer service metric should be added to represent the Uisce Éireann Text Alert service. One of the findings of the Forum's 2025 survey was Uisce Éireann is improving in providing advance notice to disruptions to water supply, with Uisce Éireann's Text Alert Service reported as the highest notification method. However, only 24% of public water consumers indicated they had signed up for this Text Alert, highlighting scope for improvement to inform consumers of issues. **The Forum recommends that the CRU include a target to increase the % of public water consumers who have signed up to the text alert**, to inform the public of planned or unplanned disruptions. The text alert service should also provide any updates on progress to returning to normal water services.

**The Forum recommends that an additional metric is added to the customer service index to reflect proactive communication with public consumers.** In the 2025 survey, 91% of Uisce Éireann consumers indicated they would like more information on their water supply. While the Forum acknowledges there is a significant amount of information on the Uisce Éireann website, it is of the view that most people do not know what information is available or what to look for. The Forum therefore recommends that Uisce Éireann set up a new Phone App which can provide easy-to-use information to the public on their drinking water supply, including water quality, supply demand issues, monitoring and reporting data, drought monitoring, water conservation messages, etc. This would support Uisce Éireann to meeting its new responsibilities of the Recast Drinking Water Directive. Ease of contacting Uisce Éireann or finding out relevant information through a new App could be a new customer service metric to be included in the list above. In addition to an App, Uisce Éireann could write in local newspapers and social media channels about local water or wastewater projects, highlighting the expected benefits to the local community. The CRU should consider how they can monitor and assess these additional metrics to better reflect the wider interests of public water consumers.

## *8.2 Water Stakeholder Engagement Evaluation Panel*

As part of the Performance Assessment Framework, the CRU had proposed to establish a Water Stakeholder Engagement Evaluation Panel (WSEEP) incentive during RC3, however this was not progressed. For RC4, the CRU proposes to retain its plan to establish this Water Stakeholder Engagement Evaluation Panel, noting the important role it can play in helping to protect the interests of consumers. Further, the CRU notes that this incentive is used by the CRU in the regulation of the gas and electricity sectors. The CRU indicate that this panel will allow the CRU to benchmark Uisce Éireann's performance against that of comparator utilities, e.g., GNI and ESB, which could help drive improvements in the way Uisce Éireann engages with its stakeholders. It is proposed that the Panel would compose of a variety of key Uisce Éireann

stakeholders, including a cross-section of representatives from industry, environmental associations and academia. The Panel would be required to score the quality, implementation and effectiveness of Uisce Éireann's stakeholder engagement.

Uisce Éireann, however proposes that the CRU should not establish the Water Stakeholder Engagement Evaluation Panel incentive, suggesting it may duplicate functions of existing Uisce Éireann stakeholder groups, for example, Uisce Éireann's Stakeholder Forum. The CRU welcomes any comments on the CRU's proposal to retain the intention to establish WSEEP for RC4.

**The Water Forum recommends that in advance of progressing or establishing the WSEEP, that the CRU engage with both the Water Forum and with Uisce Éireann to discuss the proposed objective of the WSEEP and how it aligns with the functions of existing stakeholder groups, including the Water Forum.**

**The Forum acknowledges and agrees Uisce Éireann's concerns in relation to duplication of functions of existing stakeholder panels and is therefore of the view that a review of existing panels, their members and functions, is required as part of this discussion.** The question as to whether there is need for an additional WSEEP depends on the expected function of that panel, relative to what is being done already. Clarity on what is meant by 'stakeholder engagement' will also be required, to indicate if the objective is to engage with key national stakeholders, such as members of the Water Forum, regional stakeholders of a specific water or wastewater project, or the general public – all of whom would be considered a stakeholder of Uisce Éireann. The CRU and Uisce Éireann should also consider what is the expected outcome of this stakeholder engagement – is it to get buy-in to projects already planned and underway, or to seek local knowledge to inform the planning and development of local projects.

As a stakeholder body, the Water Forum advocates for stakeholder engagement in the development and implementation of water policies and management of Ireland's water resources. The Water Services Act 2017 outlines the statutory functions of the Water Forum, which includes:

- To advise the Minister in relation to Government water policy, including the interests of the customers of Uisce Éireann (Irish Water).
- To make recommendations to Uisce Éireann (Irish Water) in relation to the performance by Uisce Éireann in its functions, and when requested in writing in that behalf by Uisce Éireann, on any policy document prepared by Uisce Éireann
- To advise and provide observation to the Commission for the Regulation of Utilities (CRU) in relation to the performance by Uisce Éireann in its functions, and when requested in writing in that behalf by Uisce Éireann, on any policy document prepared by Uisce Éireann.

To support these functions, members of the Water Forum engage with Uisce Éireann a number of times each year, often to receive a briefing and engage on Uisce Éireann consultation documents, but may also engage outside of a consultation, such as on water conservation or on progress to

reduce urban waste water as a pressure on water quality. The Forum would therefore be in a position to provide information to the CRU on how Uisce Éireann have engaged with the Forum Members in relation to national policies and UÉ plans.

However, if the objective of this WSEEP is different than the objectives of stakeholder engagement by the Water Forum, then the Forum is **of the view that this WSEEP may need to be considered by the CRU**. Arcadis reported a lack of structured stakeholder management across several projects which risks deliverability where key decisions depend on third parties, indicating that the concern they have is in relation to engaging with regional stakeholders in relation to specific projects. The Water Forum would not have the information available to evaluate stakeholder engagement on specific projects, as it usually does not engage with Uisce Éireann at this level.

**The Forum recommends that the CRU also evaluate how Uisce Éireann engage with the general public, through ongoing evaluation of customer service, communications and building public trust.** The Water Forum is of the view that Uisce Éireann's own Stakeholder Forum is not suitable to independently review the quality, implementation and effectiveness of Uisce Éireann's stakeholder engagement, due to the obvious conflict of interest.

### *8.3 Community Engagement*

The CRU positively notes Uisce Éireann's increased engagement with local communities, particularly in complex projects such as new wastewater treatment facilities. Early and structured stakeholder engagement has proven beneficial in achieving social consensus, reducing project delays, and mitigating legal and reputational risks. **The Water Forum supports the CRU proposal for Uisce Éireann to embed a more systematic approach to community engagement as an integral part of capital programme delivery.** This should be supported by clear internal protocols to ensure early engagement is prioritised and monitored consistently across all relevant programmes.

In line with previous positions, the Water Forum recommends that Uisce Éireann should be better integrated within local communities, for example through the establishment of local water officers. Uisce Éireann representation at local events will help to build presence and trust with communities. Furthermore, Uisce Éireann staff should be engaged with the Catchment Community Fora, which are currently being established under the 3<sup>rd</sup> Water Action Plan. This would allow communities to have meaningful engagement with Uisce Éireann at a local level to learn about and discuss local projects and initiatives that impact water and wastewater services, and the local water environment.

### *8.4 Security of Supply*

The Forum shares concerns with the CRU in relation to Uisce Éireann failing to achieve and report on key performance targets in relation to security of supply in RC3. The Forum is particularly concerned that Uisce Éireann is proposing to defer such reporting until RC5.

The Forum is of the view that understanding and reporting on security of supply is a critical aspect of sustainable water management and Uisce Éireann's ability to sustainably support increased housing targets and economic growth. A lack of understanding and reporting on security of supply poses a serious risk that key stakeholders will not have access to critical information needed to understand the scale of any deficits.

The Water Forum supports the recommendation by Arcadis that this risk be more clearly quantified and discussed with the CRU to assess the severity and scale of supply-demand challenges across the various water resource zones. Furthermore, the Forum supports the CRU's recommendation for a dedicated security of supply report with a requirement for Uisce Éireann to report aggregate nationwide measures on security as well as measures at the individual Water Resource Zone level. **The Forum is of the view, however, that addressing the current weakness in Security of Supply would require both system improvements and capacity building, not merely enhanced monitoring requirements.**

**The Forum recommends that the existing obstacles (e.g. capacity, expertise, data) to report on security of supply are identified and addressed as a matter of urgency.**