



# Water Forum Submission to the Commission of Regulation of Utilities on Uisce Éireann’s Non-Domestic and Trade Effluent Tariff Framework

**10<sup>th</sup> February 2026**

## Introduction

The Water Forum welcomes the opportunity to respond to the public consultation of the Commission for Regulation of Utilities (CRU) on Uisce Éireann’s Non-Domestic and Trade Effluent Tariff Framework. The Forum welcomes the briefing on the consultation documents by the CRU to the Water Forum on the 26<sup>th</sup> January 2026.

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.

## Background

This consultation paper sets out Uisce Éireann’s proposals for, and the CRU’s proposed decision on, transition arrangements and Tariff Application Rules to accompany the implementation of trade effluent charging arrangements on 01 October 2026.

In 2024 the CRU issued a decision on Uisce Éireann’s proposal to update the Non-Domestic Tariff Framework, including harmonised trade effluent charging arrangements and dividing trade effluent customers into categories depending on their commercial and industrial activities. All categories would pay a trade effluent specific “Compliance and Licensing” fixed charge.

Some trade effluent customers have remained outside of the Framework, and as such, have not seen increases to their bills in recent years. Many of these customers are also on charging arrangements that have weak incentives to reduce the level of pollutants and volume of trade

effluent, which is more polluting than regular wastewater. With the implementation of harmonised trade effluent tariffs, their bills will be updated to reflect inflation in recent years and the significant need for investment into water and wastewater infrastructure. The trade effluent charging arrangements align with the principles set out in the EU Water Framework Directive, including cost recovery and the polluter pays principle.

Investment in water and wastewater infrastructure is crucial for ensuring the reliability, efficiency and sustainability of Ireland's water supply, which is essential for economic growth, social welfare and environmental protection.

## Water Forum Recommendations

### High Level Position of the Water Forum

- The Water Forum supports the polluter pays principle and therefore agrees with the need for non-domestic and trade effluent tariffs to drive innovation and improvements in the sustainability of operations.
- The Forum is of the view that all water and wastewater connections should transition to cost-reflective tariffs both in terms of the polluter pays principle, to incentivise water conservation and to ensure transparency and equity in the system.
- The Forum supports the need for incentives for both water conservation and reduced volume of trade effluent generated, through higher charges for more polluting effluent.
- The Forum supports the need for monitoring the strength of site-specific trade effluent.
- The Forum recommends that Uisce Éireann offer support to non-domestic and trade effluent customers to provide advice on how to increase water conservation and reduce the volume and strength of effluent, where feasible.

### 1. Transition Arrangements

#### 1.1 Eligibility and Duration

Do you agree with the CRU's proposed decision to limit eligibility for transition arrangements to those trade effluent customers that are moving tariff structure? Please state your reasons why.

Do you agree with the CRU's proposed decision to transition all trade effluent customers to cost-reflective bills by 1st October 2030? Please state your reasons why.

The Water Forum is of the view that all water and wastewater connections should transition to cost-reflective tariffs both in terms of the polluter pays principle and to incentivise water conservation.

The Forum agrees with the CRU that only trade effluent customers moving tariff structure would be eligible for transition arrangements. This improves equity across non-domestic customers and trade effluent customers, while still giving time to implement both water conservation and pollutant mitigation measures to mitigate bill increases.

## 2. Tariff Application Rules

### 2.1 Mogden Charge in the Absence of Sampling

Do you agree with the CRU's proposed decision to accept Uisce Éireann's proposed approach to calculating the COD and SS values in the absence of sampling? Are there alternative methods to determine the COD and SS values that should be considered?

The Forum recommends that unmetered trade effluent connections should be metered and monitored as a priority, in line with CRU requests to create equity among trade effluent customers and adhering to the polluter pays principle. The Forum recommends that Uisce Éireann set clear targets for non-domestic trade effluent customers to ensure that the volume and strength of trade effluent is being monitored (rather than estimated). The Forum supports the CRU's proposal that monitoring data should be available across customers within 1 year, at the latest.

The Forum recommends that as part of the new connection and licencing process, that all new non-domestic trade effluent customers must have a meter to measure volume of effluent and a sampling programme to monitor and report on the strength of the effluent.

In the interim, if meters and monitoring data are not yet established, the Forum agrees with the CRU approach to calculate effluent based on licence limits.

## 3. Customer Support

### 3.1 Customer Communication

Are there any other specific measures that Uisce Éireann could take in order to better communicate with customers about trade effluent tariffs, customer bills or updated tariff rates?

The Forum supports the proposal for more education to promote water conservation, reduce pollution from effluent and help customers understand measures they can put in place to help mitigate future bill increases. Uisce Éireann's Water Stewardship Programme and newly introduced Advanced Water Stewardship Programme should be used to support Irish businesses to increase water conservation and reduce the strength and volume of wastewater. The Forum recommends strengthening these programmes with ongoing engagement and follow-up courses to keep businesses up to date on new water conservation and wastewater technologies or initiatives.

Information to customers (e.g. customer booklets, customer information paper, trade effluent webpage) needs to be accessible, particularly contact information, online trade effluent calculators and information on the Water Stewardship and new Advanced Water Stewardship programmes. The Forum recommends the use of webpage metrics to determine if further communications and education initiatives are needed.

The Forum recommends that Uisce Éireann call centres should remain in place throughout the transition period and not only for the short period to provide information on upcoming charges.