

Draft Minutes of the Plenary Meeting
Tuesday 9th December 2025
Online via Zoom

Attendees: Matt Crowe, Dominic Cronin, Marie Doyle, Michael Kenny, Connie Rochford, Charles Stanley-Smith, Neil Walker, Eamon Carroll, Jean Rosney, Ciarán Maguire, Tadhg Buckley, Keith Hyland, David Wright, Constanze O’Toole, Fintan Kelly, Eimear Manning

Apologies: Karin Dubsky, Sinead O’Brien, Martin McEnroe, Elaine McGoff, Mark Farrelly, Steve Conlon, Brendan O’Brien, Suzanne Linnane, Maria Snell, Maria O’Gorman

In Attendance: Donal Purcell, Triona McGrath, Divya Flynn, Aisling Corkery

| No. | Item | Details |
|-----|--|--|
| 1 | Apologies & Minutes | <p>Welcome Chair welcomed members and Donal Grant Principal Officer from the DHLGH to the meeting. He also expressed condolences to Martin McEnroe on the passing of his brother Thomas.</p> <p>Declaration of Conflicts of Interest There were no conflicts of interest declared.</p> <p>Consideration of draft minutes of Meeting No. 70 held on 4th November 2025 The minutes were approved by the members.</p> <p>Action: The approved minutes to be published on the Forum website Matters arising: None</p> |
| 2. | Stakeholder consultation on the proposed regulations for the registration of small scale wastewater discharges | <p>2.1 Presentation by Donal Grant, Principal Officer, Water Policy Section-DHLGH on the proposed <i>Regulations for the registration of Small-Scale Wastewater Discharges.</i> Presented by Donal Grand, DHLGH Introduction:</p> <ul style="list-style-type: none"> Discharges have become an admin burden for UE and EPA in terms of authorisation leading to delays in infrastructure. Ongoing pilot projects in unsewered settlements– cost is significant, there was desire to allow private developers to help with this. Developer Provided Infrastructure (DPI) plants have ongoing issues which are part of a remediation scheme. <p>Memo for Government:</p> <ul style="list-style-type: none"> To safeguard against DPI issues UE will be centrally involved in anything constructed by a developer via agreements on ownership. Regulatory reforms for wastewater discharges – authorisation streamlining by EPA <p>Principles:</p> <ul style="list-style-type: none"> UE to engage directly with developers and secure authorisation from EPA. |

- UE Standards must be complied with, the EPA will have environmental specifications, the developer is responsible for planning permission.
- Funding: Developer to fund wastewater infrastructure. Also looking into cost sharing to allow for expansion capacity – details being worked out.
- Regulatory Reforms: Will be easier to authorise small discharges (provided for in the WFD)

Described Process Flow diagram from proposed new discharge, UE/developer engagement, planning permission, registration, handover and compliance.

Next Steps:

Tight turnaround for comments and finalise draft regulations – end of year Design standards and application guidelines are also on a tight time frame – (within 2 months of regulations).

Regulations to be drafted next week.

Q & A

Chair: There is a need to speed up housing delivery, but we need to ensure developments don't happen at the expense of water quality. The regulations state they cannot cause a deterioration in current status. However, if the status is not good it means they don't have to improve – how will a scheme ensure deterioration won't happen?

A: The EPA share similar concerns and will develop guidelines as part of assessment. This is the first thing a developer will have to consider when assessing the receiving waters (surface only) on the site.

Q: This regulation was raised at a meeting of the UE Stakeholders – given the lack of sewerage in these areas they were talking about SUDS and Constructed Wetlands.

A: Yes, UE are promoting NBS over mechanical solutions, the standards will cover both but there will be a greater land take for NBS, for e.g. a septic tank to reed bed to willow bed and discharge to river solution. In some places NBS won't be feasible but there is less work involved in NBS.

Q: It is known that we already have too many wastewater treatment plants per capita, therefore this seems to contradict the approach to reduce the number of WWTPs. Do we know how many developers will avail of this?

A: You are correct, we already manage more plants relative to other countries but this a solution for rural areas. There are concerns about Local Area Planning, so there may be requirement for changes there also.

Q: In Whitechurch the DPI stopped working (pumps failed and weren't fixed) How do you get a recourse if the developer no longer exists?

A: UE has a responsibility to remediate these DPIs. There will be safeguards in the form of a legal agreement between the Developer and UE, UE are the only ones who can register the discharges and it must be registered before it is put in place.

Q: Do UE have the capacity and people to take this on, will they have the ability to oversee the construction to their standards?

A: UE need to future proof this, in reality there will be a lag between applications and registering with the EPA. There will be reappraisals by developers on the land bank that they own, some land may no longer be

suitable. UE will have approx. 4,500 people by the time the transfers happen but will have to recruit outside for more staff and expertise.

Q: Will there be monitoring of the discharge?

A: General binding rules on monitoring will be more detailed but they will be similar to current requirements by the EPA.

Q: Have you engaged with the Irish Council of Social Housing, if not I would encourage you to do so?

Comment: We know what land is zoned, you can't wait for developers to come to you. A proactive initiative needs to be put in place to identify smaller development sites and engaging with the Developers.

Q: Given the state of the legacy problems out there, can you ensure there will be enough enforcement of this?

A: They are two different scenarios; DPI were put in by developers and enforced by under resourced LAs. This will be taken on by UE and enforced by EPA and supported by the DHLGH.

Q: What is this based on, is it building on something? People in the communities have a sense that this is made up as you go along, there has been no time given to engage with communities.

A: It's built on the difficulties that UE and EPA have with the existing discharge regulations, they are not fit for purpose in the case of small rural developments. UE don't have the capacity to connect small discharges to the network, this is a solution.

Q: In rural areas where there is no piped wastewater, will the discharge locations and volumes be available to the public, this is important for GWSs and where they extract their source water, this could have a negative impact here. Information to the public should be available via EPA Maps and catchments.ie, to have all data in the one place.

A: No difficulty with data being publicly available

Q: What if another developer comes and adds houses to the development in the future?

A: This is something we need to look at on the planning side, it is not something we want to see.

Comment: We need to look into the issues and complexities that might arise throughout the process, so that it doesn't lead to unintended consequences for water quality and cumulative issues.

Chair: Thanked the DHLGH for the presentation and answering questions. Donal Grant then left the meeting.

2.3 Discussion and Next Steps

Research Lead discussed approach to response under the following headings:

- Protection of waterbodies
- Cumulative impact from multiple developments
- Data publicly available – drinking water source protection
- Unintended consequences – learning from the past
- UE resources, expertise and oversight
- Enforcement and monitoring

| | | |
|----|------------------|---|
| | | <ul style="list-style-type: none"> • Being proactive in relation to suitable sites <p>Comment: It will be useful to look at the Whitechurch example – developer went bust and pumps stopped working, safeguards need to be in place to prevent this happening again.</p> <p>Comment: We have no information about how many agglomerations will be attached to this, do UE have enough expertise to upscale this? Is there enough expertise to maintain and monitor NBSs – capacity is an issue, if we don't know how many their will be.</p> <p>Comment: No reference to catchments or catchment plans – what is the impact on the catchments.</p> <p>Comment: DHLGH don't have water quality in their sight, this is about what they need to get done to sort out housing. We have been here before and have witnessed bad construction that occurred during the Celtic Tiger, this is dangerous.</p> <p>Comment: There are still lots of existing estates that need to be sorted out.</p> <p>Comment: Lots of single house don't get planning permission because the sites are not suitable. Getting the term site suitability into this would be useful from a planning point of view.</p> <p>Comment: Will the NBS have issues such as odour/ insects (mosquitoes etc)</p> <p>Comment: This could be a huge distraction in terms of resources for the EPA and UE, have they thought this through, could it cause delays elsewhere to other projects.</p> <p>Comment: Some of the large developments 200-1000PE could be refined under this when they start to look at it, which might reduce the work load.</p> <p>Comment: Always a short lead time on these processes – we need to try and address this.</p> |
| 3. | Corporate issues | <p>3.1 Update on Forum expenditure to 30th November 2025</p> <ul style="list-style-type: none"> • SEO explained that expenditure to 30th November 2025 was €688, 533 and that there would be a slight underspend in communications and education due to a change in staff this year. <p>3.2 Correspondence - None</p> <p>3.3 Update on Governance matters – The SEO provided the following update;</p> <ul style="list-style-type: none"> • Memo of Funding agreement has been signed by DHLGH, The Forum Chair and Tipperary County Council. • Liaising with the DHLGH on Terms of Reference and Standing Orders and Draft Operating Procedures for the Forum. • The Periodic Critical Review is due to take place in 2026 • Membership: One Forum member is on maternity leave; Discussed this with the Water Policy Section in DHLGH & agreed that the membership will be temporarily reduced by one person for the quorum on DHLGH advice. • Discussed preparation for 2027 membership change • Explained that due to the change in both the profile and volume of the work that the DHLGH had sanctioned the regrading of the Administration position from Clerical Officer to Staff Officer from January 2026. The SEO |

| | | |
|----|---|---|
| | | <p>acknowledged the contribution that the current Clerical Officer, Ms Martina Ryan had made to the work of the Forum. She played a key role in developing administration systems and processes for the Forum over the past six years. This was acknowledged by the Chair & members who wished her well in her future work.</p> |
| 4. | Education & Communications | <p>4.1 Update on Communications & Education Actions Chair thanked Comms Lead on efforts put into the weekly update.</p> <p>Comms Lead discussed website upgrade and launch (mid feb) – redesign with members photos and bios.</p> <p>Stripe YSTE Exhibition: discussed dates, stand activities and award. Thanked the members for giving their time to the event.</p> |
| 5. | Research & Policy | <p>5.1 Update on Research & Policy Research Lead noted Submission of 6th NAP and progress on Agriculture and Water piece.</p> <p>CRU Consultation on Capital Investment Plan (RC4) – CRU are requesting more efficiency for the same money. CRU Briefing on 12th Dec at 10:30am. Technical assistance sought from Dr John Joyce (Adjunct Prof DCU / Applied Environmental and Resource Economist)</p> <p>Research Update: Water Quality of Transitional and Coastal Waters – finalising reports. Propose to present to CMSC week of Jan 29th, 2026.</p> <p>Public Water Consumer Survey: finalising report – to present to the Plenary 20th Jan. 2026.</p> |
| | Review of 2025 Actions & key focus areas for 2026 | <p>6.1 Summary of Forum Actions from 2025 <i>Discussed CMSC Key Action in 2025:</i></p> <p>Presented key work areas completed in 2025</p> <ul style="list-style-type: none"> • <i>Commissioned research projects</i> • <i>Policy Submissions (public consultations)</i> • <i>Policy Advice</i> • <i>Advice to WPAC</i> • <i>Communications</i> <p>The Chair and a members commented that the range of work is impressive and there is a need to make sure these submissions are easy to find (searchable) on the new website.</p> <p>6.2 Proposed focus areas for the Forum in 2026 Discussed planning for 2026 in terms of policy advice, consultation, research project and dissemination, events/workshops, fieldtrips, communications, new strategic plan and new members.</p> <p>The Forum needs to be clear on proposed policy advice and what it is for – Future advice:</p> <ul style="list-style-type: none"> • Minister (Water efficient buildings, private wells, interests of public consumers) • WPAC (SWMI, CMWPs, SAWPS, IAS) • UE (interest of public consumers, UWW SAWP) |

- CRU (water efficiency, interest of consumers, trade effluent and connection charges)
- Agencies (LAWPRO, EPA, NPWS, IFI, NFGWS).

Discussed Proposed Research Projects

1. WFD – Implementation, Progress, Blockages
2. Drinking Water & Public Health (Microplastics, PFAs and Emerging Contaminants: Implications of Drinking Water Policy)
3. Family Farm Model: Centred on WQ and the Environment
4. Communication Strategy for 4th WAP (from Communications Budget)

Comment: LAs are only starting to look at new DW contaminants from next year. Topic 2 (DW and public health) could be looked at in terms of source water – risk assessment and risk management piece, how will it progress and are we prepared to implement the recast and what is coming down the line.

Comment: Concern that the proposal on the Family Farm Model might bring us back to the past. Happy to focus on the 4th topic, this is really important and has come up on numerous occasions

Comment: Waste management, discharge licenses and telemetry are coming into the RC4, CRU have highlighted this multiple times. Need to engage with RC4 and follow on from there.

Members were of the view that we should explore Research Topics 1 and 4 initially.

CMSC Key Action 2026

- *Marine and Transitional Waters*: Research to policy in 2026. Possible field trip, e.g. Ladies Island, Wexford.
- *Water Action Plan (WAP)*: SWMI public consultation, engagement with DHLGH, LAWPRO, SAWPs
- *WAP Research*: Tender for WFD Implementation research.

WSSC 2026 Key Actions

- *Water Conservation*: Contribute to Water Conservation Working Group, letter to Minister re Water Efficient Housing.
- *UE Communications*: Discuss interests of public consumers, communications, customer service, access to information, transparency, decision making progress and timelines.
- Present and disseminate Survey Research and develop policy.
- *Wastewater*: SWAP urban wastewater, Fieldtrip to Constructed Wetland, Finalise Internal research on S4 Licenses.
- *Drinking Water & Public Health*: Drinking Water Quality Controls (Drinking Water Safety Plans), commissioned research and proposed fieldtrip to UE Labs.
- Rural Water: Letter to Minister re Private Wells
- *Public Consultations*: CRU (UE CIP, Trade effluent, Connection Changes), Any UE consultations.

2025 Communications Highlights

- Discussed media engagement and press releases in 2025
- Highlighted field trip to Vartry Reservoir and Water Treatment Plant
- Reviewed conference participation and presentations

| | | |
|----|-----------------------|---|
| | | <ul style="list-style-type: none"> Youth engagement – BT Young Scientist, Science Blast and Youth Workshop <p>Proposed Comms & Education Priorities for 2026</p> <ol style="list-style-type: none"> 1) Increased digital visibility and reach for Forum research & insights 2) Amplifying sector voices via members knowledge of water pressures 3) Policy-linked Engagement aligned to research and stakeholder workshops 4) Demonstrating impact and influence via an impact review report <p>Comment: Policy linked engagement brings voices to the table that might otherwise not be heard, this is very important. Comment: Do we need to demonstrate impact other than our core purpose.</p> <p>Some members have concerns about the Amplifying Sector Voices piece/ Comment: Query on when SAWPs quarterly updated were submitted. The one for Q4 was supposed to be about pressures at waterbody scale.</p> |
| 6. | AOB | WSSC Meeting – briefing from CRU on UE CIP/RC4 on Friday 12 th Dec at 10:30am via Zoom |
| 7. | Date for next Plenary | To confirm the date of the next Plenary meeting - Tuesday 20th January in the Ashling Hotel |