



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

19th June 2026

Contents

Background.....	2
A Vision for Implementation of the 4 th Water Action Plan.....	2
Sectoral Action Work Plans	3
Catchment Management Work Plans	3
Catchment Management Work Plans – Outcomes Focused	4
Catchment Management Work Plans - Climate Change	5
Catchment Management Work Plans – Transitional and Coastal Waters.....	5
Implementation – Data Dashboard and Action Tracking.....	6
Governance	7
Public Participation.....	8
Policy Coherence	8
Pressure: Agriculture	10
Pressure: Hydromorphology	15
Pressure: Forestry.....	17
Pressure: Urban Wastewater	20
Pressure: Domestic Wastewater.....	22
Pressure: Invasive Alien Species	24

Background

The Water Forum has a statutory advisory role on the development and implementation of Ireland’s River Basin Management Plan and the implementation of the Water Framework Directive.

Following the publication of the 3rd Water Action Plan in September 2024, the Water Forum has engaged significantly with the Department of Housing, Local Government and Heritage (DHLGH), the Local Authorities Waters Programme (LAWPRO), the Department of Agriculture, Food and Marine (DAFM) and the Environmental Protection Agency (EPA) in relation to the implementation of the 3rd plan. The Forum has developed a series of policy advice to the Water Policy Advisory Committee and other agencies with a responsibility to deliver on Ireland’s WAP (Table 1).

AFU Advice to	Focus of Advice	Date
LAWPRO & DHLGH	Sectoral Action Work Plans	Dec-24
WPAC	Sectoral Action Work Plans	Dec-24
DHLGH	Nitrates Action Plan Interim Measures Consultation	Dec-24
LAWPRO & DHLGH	Sectoral Action Work Plans Templates	Mar-25
DAFM	Agriculture Sectoral Action Work Plans	Mar-25
DHLGH	Hydromorphology Sectoral Action Work Plans	Mar-25
DAFM	Forestry Sectoral Action Work Plans	Mar-25
Uisce Éireann	Urban Wastewater Sectoral Action Work Plans	Mar-25
DHLGH	Heavily Modified Water Bodies Consultation	May-25
DHLGH	4th RBMP Timetable Work Programme	Jul-25
LAWPRO	Catchment Community Fora	Jul-25
LAWPRO	Catchment Community Fora	Oct-25
DHLGH	6th Nitrates Action Plan Consultation	Nov-25
DHLGH	Pre SWMI Workshop (Pre-consultation)	Nov-25
EPA	National Inspection Plan (septic tanks) Pre-consultation	Mar-26
WPAC	EPA Dashboard, Catchment Management Work Plans	Apr-26

A Vision for Implementation of the 4th Water Action Plan

The Forum acknowledges that the 3rd Water Action Plan saw significant improvements in some areas since the previous River Basin Management Plan (RBMP), including

- The establishment of the Programme Delivery Office, which provides oversight and monitors progress of implementation on a quarterly basis.
- The first iteration of Sectoral Action Work Plans (SAWP) has been published, where sectors have presented their approach to deliver on the WFD objectives, which are being tracked by the Programme Delivery Office.
- Five Catchment Management Work Plans (CMWP) are being piloted, to trial how to track and implement measures at waterbody scale.
- Five Catchment Community Fora (CCF) are being piloted, to establish how CCF can be established and how best they can support the implementation of the Water Action Plan.

The Forum would like to see all these initiatives evolve and improve into the 4th cycle, with a relentless focus on targeted implementation to allow them to achieve the required water quality outcomes.

Sectoral Action Work Plans

The Forum welcomes the first iteration of the Sectoral Action Work Plans (SAWP) which reflect how each sector will deliver WFD Objectives, in line with sectoral actions set out in the 3rd Water Action Plan.

The Forum supports the fact that the progress of the SAWP is being monitored by the Programme Delivery Office, where the obstacles to implementation (such as resources, dependencies on other policies/actions) are also being identified. **The Forum recommends that as SAWP are being revised, that proposed measures by the sectors are linked to specific issues (e.g. N reduction, P reduction). Furthermore, the tracking and reporting of SAWP should be linked to outcomes where the data allows.**

The Forum welcomes that some of the SAWP include links to the Catchment Assessment Master Spreadsheet, which is the dataset of every waterbody, with their WFD status, objective, significant pressures and significant issues. The Forum recommends that this link is included in every SAWP, with guidance on how to filter the data into specific pressures (including sole pressure categories).

As outlined in the 3rd Plan “*the objective of all Sectoral Action Work Plans will be to ensure the sector will no longer be a significant pressure on water status*”. **The Forum recommends that this objective is carried forward into the 4th cycle, so that the sector is tasked to increase their efforts to reduce the number of waterbodies at risk from the sector and to put effective protection measures in place to prevent any further deterioration.**

Catchment Management Work Plans

The Water Forum welcomes the progress made in developing templates and piloting of Catchment Management Work Plans (CMWP) which is a significant development of the 3rd plan.

The Forum appreciates the significant challenges faced in relation to data gathering, data analysis and data sharing arrangements at waterbody scale. Despite this acknowledgement, the Forum has concerns with some of the delays in data sharing still being encountered, particularly with DAFM and the OPW. The ability to reach these data

sharing agreements is one of the most significant obstacles which will influence the implementation and progress of the CMWP. **The Forum emphasises the urgency in addressing these data sharing obstacles.**

The Forum acknowledges that the first iteration of the CMWP is tracking actions at waterbody scale across sectors to assess implementation of existing policies and plans. If we are to see any improvements in water quality across catchments, we will need to move from ‘activity tracker’ to ‘targeting action’. **The Forum recommends that the ambition of the CMWP should remain high for the 4th plan, where integrated catchment planning approaches will be used to identify and decide on further specific measures for each water body,** as is currently outlined in the 3rd Plan.

Catchment Management Work Plans – Outcomes Focused

To ensure that the CMWP in the 4th cycle are focused on outcomes for water quality and WFD status, measures will need to be identified to address specific issues. Each CMWP should consider and record:

- Which issue/pressure (e.g. pollutant, barrier) each proposed measure is intended to mitigate
- The effectiveness rating (high/medium/low) of each of the measures that are planned or have been established, following the approach used by the Waters of LIFE Framework of Measures for High Status River Water Bodies ([Resources – Waters of Life](#)).
- What is the scale of measures implementation that would be needed to achieve the water quality (and other environmental) outcomes relative to the scale of measures being proposed?
- What is the predicted in-stream load reduction of specific pollutants in each of the targeted waterbodies/catchments once measures have been established?
- What is the expected timescale for statistically significant downward trends in pollutants (interim KPI)?
- What is the expected timescale for achieving WFD status objective?

Based on the above, it is proposed that the following should be considered:

- In catchments where nitrogen and/or phosphorus are the significant issues, will the regulatory measures be adequate to achieve the required in-stream nitrogen and phosphorus load reductions?
- If the regulatory measures are insufficient in certain catchments, what non-regulatory (voluntary) measures would be required to meet WFD objectives?

- What scale of these measures would be needed and what is the feasibility of achieving a sufficient implementation scale?

Substantial long-term financial and staffing resources are needed to support implementation of targeted measures; the Forum recommends that these are identified and considered as soon as possible for inclusion in the 4th Plan.

In catchments of concern where significant nitrogen and phosphorus reductions are required – even without knowing the exact rate of implementation, planning around additional measures should be started immediately, clearly presenting the associated trade-offs of proposed measures. These catchments should be considered as a distinct group and prioritised, as more effort and resources are likely to be needed.

Catchment Management Work Plans - Climate Change

As CMWP are being developed, they will need to consider the threat of future climate change, including changes to hydrology, nutrient transport and ecological resilience. This will ensure that they are not only dealing with the current pressures and water quality challenges but are also considering future challenges that will be accelerated by climate change, which could influence the effectiveness of measures to meet WFD objectives.

Catchment Management Work Plans – Transitional and Coastal Waters

According to the latest EPA report 2019–2024 (EPA, 2025), only 30% of transitional waters (and 83% of coastal waters) achieved good or better ecological status. This marks a slight decline compared to previous cycles and highlights the vulnerability of estuarine systems, which serve as the final receiving waters for upstream pressures. The challenge of managing these waters is compounded by the interaction of multiple European and national policies, implemented by different government departments (O’Boyle, 2026)¹.

In its submission to the 3rd Water Action Plan, the Forum called for a section in the Plan to address the need for an integrated approach to manage transitional and coastal waters, including measures to address policy coherence, such as interdepartmental collaboration, and alignment of programme measures between the WFD and the Marine Strategy Framework Directive (MSFD). Many of the recommendations were not included in the 3rd Plan.

The Forum is still of the view that the approach to managing transitional and coastal waters needs to be strengthened. The Forum commissioned research in 2025 aimed at

¹ O’Boyle (2026). Policy Recommendations for Aligning and Strengthening Integrated Catchment and Coastal Management. [Policy-Brief_Water-Quality-Management-of-Transitional-Coastal-Waters_AQUAFAC_T Water-Forum-1.pdf](#)

providing policy recommendations to improve the management of transitional and coastal waters around Ireland (O’Boyle, 2026). Some of the recommendations made in this report, are now being proposed by the Forum for the 4th Water Action Plan.

Recommendations for the 4th cycle, supported by O’Boyle (2026):

- Implement a dual-nutrient management approach that addresses both nitrogen and phosphorus along the freshwater–marine continuum. Historically, efforts have concentrated on reducing phosphorus in freshwater systems, which has altered N:P ratios and inadvertently increased nitrogen export to vulnerable coastal waters. Future strategies must account for the shift in nutrient limitation - from phosphorus in freshwater environments to nitrogen in marine systems.
- The sensitivity of transitional and coastal waters to nutrient enrichment and eutrophication varies depending on local conditions (such as residence time, light availability). In catchments with transitional and coastal waters, the CMWP should consider both nutrients coming from upstream and the expected ecological response in estuaries and coastal waters. Targeted measures should be applied based on local conditions by aligning actions with the expected ecological response in estuarine and coastal waters.
- The EPA should develop a national ‘vulnerability index’ for nutrient enrichment and eutrophication in estuaries around Ireland. This could indicate where actions should be prioritised by identifying where the expected ecological response is greatest.
- Consider the governance structures that would be required to support a coordinated implementation of the WFD and MSFD (such as a joint steering group, expansion of scope of WPAC, etc.) and develop a combined implementation plan for better policy coherence and use of resources.
- Introduce a statutory Integrated Coastal Zone Management Strategy to bridge the gap between land-sea governance.

Implementation – Data Dashboard and Action Tracking

The Forum welcomes the developments made by the EPA and LAWPRO on the data dashboard to support the implementation of the CMWPs.

The Forum recommends that it is clear from the platform that the dashboard is currently tracking national measures and existing initiatives (e.g. EIP projects) at waterbody scale, but that even full compliance with these actions may not be enough for waterbodies to meet their WFD objectives.

For transparency and realistic expectations, the Forum recommends that the platform includes a ‘WFD Target Bar’ which could illustrate the distance for a waterbody to meet its WFD objective. This would allow a comparison to be made between the level of local

actions and the distance to WFD objective. If there are large data gaps or uncertainty in the data, this should be made clear on the platform.

The Forum is of the view that the EPA Data Dashboard could be a good platform to collate and present data collected as part of academic or citizen science research projects, as an additional tab on the platform.

Governance

The Forum acknowledges the establishment of the Programme Delivery Office and significant improvements in oversight, tracking and reporting of programme of measures in the 3rd plan.

While the Forum does not call for any change in governance structures, governance could be strengthened by operating with a clear focus on outcomes, i.e. what is each governance structure and each meeting set out to achieve. This should be reflected in the oversight and reporting on governance, **whereby each governance structure (across the 3 tiers) should report on outputs from the committees, to move meetings from updates to decision making, i.e. an outcomes-focused governance.** This could be tracked with a governance scorecard in the 4th plan.

Governance – Resourcing

The Forum would like to emphasise that the successful delivery of the 4th plan will depend fundamentally on workforce capacity, skills and long-term funding across public bodies, utilities, and local authorities responsible for implementation.

Many issues which have been highlighted as barriers in WFD implementation (data gaps, delays in assessments, slow progress on catchment initiatives) reflect not only technical and policy challenges, but ongoing capacity constraints within delivery organisations. Increased ambition without corresponding investment in people risks non-delivery and placing unsustainable pressure on already stretched workers.

Long-term implementation of the WFD requires strong, permanent in-house capability. Over-reliance on short-term project arrangements risks undermining institutional knowledge and maintaining any progress being made.

The Forum calls for stable, long-term funding to secure commitments to permanent staffing posts to support the WFD implementation, including training and career pathways in areas such as catchment management, wastewater delivery, inspection, monitoring and community engagement.

Public Participation

The Forum acknowledges the developments in public participation through the 5 pilot Catchment Community Fora (CCF) during the 3rd plan. The Forum does have some concerns with the pace for upscaling CCF beyond the 5 pilots.

The Forum calls for high ambition to roll out the CCF across all catchments early in the 4th cycle. LAWPRO should harness the expertise and interest from existing networks within catchments, such as the Rivers Trust and the National Youth Council of Ireland, to expedite roll out. The Forum emphasises that resourcing the CCF will be critical for their success and calls for early identification of resource gaps to allow for wider roll out into the 4th plan.

The Forum supports that the approach to establishing the CCF and the implementation of the 5 pilots is being evaluated to learn from the process and identify how best to upscale the CCF to other 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. The CCF could consider and identify opportunities to engage with the wider community within their catchment.

The Forum recommends that the 4th WAP should consider a dedicated Communications Strategy to educate and engage with the wider community on the value of protecting and restoring water. This should consider how water literacy can be improved to provide information to the public, e.g. through national and local campaigns. Communication material will need to be developed and presented for all types of audiences, with clear, accessible terminology. The Forum is currently commissioning research on this and will share learnings with the DHLGH.

The Forum also recommends that Local Authorities should co-ordinate their public engagement activities across water, climate and biodiversity – both to maximise use of resources, but also to ensure that the public are receiving coordinated messaging and actions around protecting the environment as a whole.

Policy Coherence

The Forum calls for improved coherence of national policies to support the implementation of the 4th cycle, supported by a policy mapping exercise to assess how aligned (or misaligned) relevant national policies are with the requirements of the WFD. It should highlight synergies (for example with the Nature Restoration Law), but would importantly highlight where national policies conflict with the WFD, and where trade-offs and solutions to address them will need to be identified.

Furthermore, there should be more emphasis on identifying co-benefits across water, climate and nature, where all measures should be tagged with co-benefits. Measures with multiple benefits could be prioritised in order to accelerate progress across all parts of the environment.

The multiple benefits of Nature-Based Solutions to address different pressures for water (agricultural runoff, wastewater-related pressures, surface runoff), and also co-benefits across water, climate and nature, should be emphasised in the 4th WAP. Building on the proposed approach to tagging co-benefits, catchment management work plans, sectoral action work plans and flood risk management measures should show where nature-based options have been considered, why they have or have not been selected, and how their water, climate and nature co-benefits will be monitored.

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 target resource use 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 an interdepartmental financing strategy to be included in the 4th Plan, to support policy coherence across water, climate and nature and to break down the siloed approaches to resourcing measures and identify an approach for long-term, stable funding for measures.**

To support the financing of water measures, the Forum recommends that a piece of research is carried out to quantify the holistic value of proposed measures, where the services the catchments provide to the different sectors are captured, along with the value that they obtain for these services.

According to a piece of research published by World Wildlife (WWF, 2023)², *“the infinite value that societies, economies and ecosystems obtain from rivers, lakes, wetlands and aquifers is chronically overlooked”*. This research highlights the many values of high-quality freshwater ecosystems for people and nature, estimating that the value of the indirect benefits of freshwater are seven times greater than direct uses.

² [1o94sij9nx_WWF_High_Cost_of_Cheap_Water_FINAL_LR_.pdf](#)

Pressure: Agriculture

Background to Agriculture as a Pressure (taken from EPA, 2024)

Agriculture is the most significant pressure on water quality, impacting over 1000 waterbodies, predominantly from run-off of nutrients, sediment and pesticides from agricultural lands and farmyards. The scale of dealing with this pressure is significant as agriculture is the most common land use in Ireland, covering approximately 70% of the country, the majority of which is in pasture.

Nutrients (notably nitrogen and phosphorus) can come from point sources (e.g. farmyards) or diffuse sources (e.g. spreading of chemical or organic fertiliser which then moves through the soil). The behaviour of Nitrogen and Phosphorus in the environment differs from one another and requires different mitigation measures.

The risk of phosphorus loss is highest on poorly draining soils and subsoils, where overland flow pathways deliver sources of phosphorus into the watercourse network with rainfall.

Phosphorus mitigation actions are best targeted at intercepting the overland flow pathways. Pathway interception actions aim to reduce runoff containing excess phosphorus and may include targeted planting of hedges and woodland along rivers, targeted riparian buffer strips, engineered ditches, and constructed wetlands and ponds. These measures may have multiple benefits for biodiversity and may reduce other pollutant sources (e.g. pathogens, sediment).

The risk of nitrogen loss is highest in freely draining settings where the excess nitrogen not taken up in grass or crops (i.e. the nitrogen surplus) infiltrates into shallow groundwater, discharges into connected river systems, estuaries and coastal waters. Excess nitrate can also percolate deeper into groundwater and impact on the quality of drinking water from wells. Mitigation actions are best targeted at controlling losses at source and reducing the nitrogen surplus, as the pathways into shallow groundwater are more difficult to intercept. The nitrogen surplus can be reduced by increasing the nitrogen use efficiency and decreasing the chemical/organic nitrogen load. This may be achieved by for example, improved nutrient management planning, optimisation of soil pH and soil fertility, and the use of catch crops in arable lands. In some catchments, a reduction in the source load at the catchment scale may also be required.

Excess losses of fine sediment can impact the condition of ecological habitats and fish spawning grounds, as well as being reservoirs and transport media for phosphorous and other contaminants. Typical sources from agricultural activities include runoff from farm roadways and bare ground, erosion of riverbanks at cattle access points, and land drainage and channel maintenance, and overland flow from farmland and yards in heavy rain. Mitigation options include livestock exclusion, fencing and stabilising vegetation on the riverbank, and attenuation ponds.

EPA, 2024. Impacts of pressures on water quality: Agriculture. [Impacts-of-Agriculture-on-water-quality.pdf](#)

Outcomes-focused measures

The Forum calls for a stronger focus on water quality outcomes across agricultural measures in the 4th Plan.

Agricultural measures (across all plans/projects/initiatives) should be clearly linked to expected outcomes to address significant issues (e.g. nitrogen, phosphorus, sediment, climate). Focusing on outcomes is essential for advisors and farmers to better understand what is being asked of them. This is also essential to set realistic expectations of what the different measures (e.g. NAP, EIPs, Ag inspections) can achieve.

The Forum recommends that a modelling exercise is carried out, to provide an estimate of the expected outcomes of the key agricultural measures for the 4th Plan including the expected outcome of the 6th NAP. This modelling should inform a gap analysis to determine what additional non-regulatory measures would be required to address agricultural pressures to meet WFD objectives.

The Forum acknowledges that there is a regulatory measure in the 6th Nitrates Action Plan for calculating the nutrient balances at farm level, which is “mandatory for derogation farms, encouraged for all farms”. **The Forum recommends that the 4th WAP includes an action for DAFM, with support of ASSAP, to develop a strategy to target training and advice on nutrient balances for non-derogation higher stocking rate farms (e.g. stocking rate above 130 or 140 kg N /Ha)** which are orange-flagged (i.e. areas requiring N reductions) on the EPA Targeting Agricultural Measures map. These farms should then be able to avail of the EIP Farming for Water fund to calculate their farm-specific nitrogen balance. This would increase the impact of this measure beyond derogation farmers and focus on the stocking rate band between 130 to 170 kg N / Ha which accounts for a significant proportion of farms in Ireland.

The Forum recommends there should be stronger emphasis on increasing water-based nitrogen use efficiency in the 4th Plan, particularly in the Catchments of Concern, where the EPA have indicated that significant nitrogen reductions are needed. According to Teagasc, the efficient use of nitrogen is essential to achieving maximum crop growth and achieving a greater return on each kg of fertiliser purchased. Calculating and improving nitrogen use efficiency would not only help to optimise the use of farm nutrients, maintain and improve soil health, it would also reduce nitrogen losses to the catchment. In the Forum’s submission to the Interim Measures of the 5th NAP, the Forum recommended that a programme should be developed to calculate nitrogen use efficiency as a non-regulatory measure. Catchment-specific targets of water-based nitrogen use efficiency at farm level would be a clear measure to support the reduction of nitrogen losses in catchments of concern.

Education, Awareness & Training

The Forum is of the view that there is a misconception that all farmers on the ground have a clear understanding about their catchment, local water issues and the targeting of measures. Educating farmers and their advisors will be essential to increase the understanding and compliance of existing regulations and increase uptake and effectiveness of voluntary measures.

The Forum calls for the 4th Plan to increase efforts and resourcing around education and awareness on catchments and water quality issues, and training on the targeting of measures to specific issues. These initiatives should extend to all types of farmers and farm advisors (not just dairy or derogation farms).

The Forum recommends that DAFM (with support of Teagasc and the DHLGH), lead a water quality education campaign whereby every farmer receives an educational pack in the post, with a map of the catchment their farm is in, the different pressures within the catchment and the specific issues in the catchment (e.g. nitrate, phosphate, sediment, pesticides etc). The pack should also list the types of measures that can be applied to reduce those specific issues. This could indicate whether measures would be high, medium or low impact for addressing a particular issue (similar to Waters of LIFE Report on Agriculture). This information pack should also include details of any relevant funding schemes which could be available for targeted measures and any wider benefits for implementing measures, such as drinking water source protection. The Forum recommends that this information on catchments and water quality measures is shared with farmer BISS (Basic Income Support for Sustainability) applications, as the vast majority of farms in the country would receive this information in the post. For example, 122,151 farmers have applied for BISS and related schemes for 2026, and each one of those will receive information in the post in February of next year. This information already includes a detailed map of the farm, so it would be a perfect opportunity to add information on individual catchments, water quality issues and targeted measures. This would provide the first step to allow farmers to co-create solutions to deal with local water issues.

The calculation of nutrient balances, together with an understanding of how nutrients behave in different soil types should be a key component of training requirements for all farm advisors. This will ensure that farmers are receiving adequate support and consistent messaging to support the implementation of this measure.

As outlined in the previous section, **the Forum is of the view, that the 4th Plan should identify an approach to target training and education for non-derogation farmers** (e.g. farmers with stocking rates above 130 kg N / Ha), particularly in areas identified as requiring nitrogen reductions. In these areas, there should be more emphasis on increasing water-based nitrogen use efficiency.

The Forum recommends that farm advisors and farmers should be educated on local drinking water sources and how farming practices can impact drinking water quality. The National Federation of Group Water Schemes (NFGWS) could support DAFM and ASSAP to indicate whether farms are in drinking water source protection areas.

The Forum supports the Teagasc Better Farming for Water Campaign, where the aim of the campaign is “*to support and accelerate the adoption of actions on all farms to improve all water bodies (where agriculture is a significant pressure) to good or high ecological status*”, through communications, stakeholder engagement, knowledge transfer, upskilling, building awareness and research. The Forum welcomes that this is building on existing water quality programmes such as ASSAP, Farming for Water EIP, Waters of LIFE, Blue Dot Catchments and the Agriculture Catchments Programme. **The Forum recommends that Teagasc are provided with adequate resources for the delivery of this campaign, which should be targeted at all types of farmers (not just dairy or derogation) for shared responsibility to protect and improve water quality.**

The Forum supports that this campaign is initially concentrating on the eight ‘Catchments of Concern’ as identified by the EPA for requiring significant nitrogen reductions (Bandon-Ilen, Barrow, Blackwater, Boyne, Lee, Nore, Slaney and Suir). The Forum recommends that this campaign is expanded in the 4th Plan to include other catchments which will require significant additional funding and resources within Teagasc. **The Forum recommends that an evaluation is carried out in the 8 catchments to determine the effectiveness at addressing surplus nitrogen in these catchments.**

Farm Advisors

The Forum is of the view that the 4th Plan should outline how it can strengthen the role and impact of farm advisors, with a particular focus on targeting private farm advisors to include water quality in their advisory role. **The Forum recommends that an action is included in the 4th WAP to develop an initiative which encompasses all farm advisors, broadening the scope to include private advisors, to receive training in water quality and catchment management.** Incentives will need to be provided to private advisors to receive this training, however this would significantly increase the advisory capacity across the country and ensure that farmers are receiving consistent water quality messaging.

Future of Farming

The Forum is of the view that a strategy to support the family farm model, with water quality at the core, should be considered for the 4th Plan. This could identify initiatives to support farm diversification, and support local, young farmers to adopt and promote sustainable farming practices guided by catchment science.

The Forum understands that a condition of the most recent decision by the European Commission to grant the Nitrates derogation in Ireland is that where derogations are

sought in areas which potentially impact designated sites (e.g. Natura 2000 sites), the derogation will only be granted if it can demonstrate compliance with the Habitats Directive.

The Forum has concerns that these assessments will only be completed by the end of 2028 leaving a significant amount of uncertainty around future stocking rates. The outcome of these assessments will have ramifications for the livelihoods of many farmers and may influence whether a farmer would need the additional slurry storage capacity, which is a new measure in the 6th NAP. While the Forum understands the need to inform farmers about the outcome of these assessments at the same time, **the Forum recommends that the process on how these assessments will be carried out should be made available as soon as it is ready to provide transparency for all stakeholders on the approach and timeframes.**

Pressure: Hydromorphology

Background to Hydromorphology as a Pressure, taken from EPA, 2024

Hydromorphology is the 2nd largest pressure on Ireland’s surface waterbodies, where the flow and physical condition of the waterbody is altered due to human activity. Human activities that impact on the hydromorphological condition of waters, for example channelisation and straightening of rivers, installation of weirs or other instream barriers, culverting or otherwise installing hard engineering works, and removal of natural features such as sand and gravel banks and riparian vegetation, are known as hydromorphology pressures. These can influence the flow of the river or stream, the structure and form of the bed, banks and riparian zones, and how they function within the surrounding landscape (EPA, 2024).

There are 448 waterbodies where hydromorphology has been identified as a significant pressure, representing 27% of all waterbodies.

Table 2: Numbers of waterbodies impacted by different types of hydromorphology pressures. Note there may be more than one hydromorphological pressure type impacting a waterbody.

Hydromorphology pressure type	Rivers	Lake	Transitional	Coastal	Total
Channelisation	286	3	0	0	289
Land drainage	70	5	0	0	75
Dams, barriers, locks, weirs	54	8	3	0	65
Embankments	29	2	2	0	31
Riverbank erosion	27	0	0	0	27
Overgrazing	14	0	0	0	14
Culverts	4	0	0	0	4

EPA, 2024. Impacts of pressures on water quality: Hydromorphology. [Impacts-of-Hydromorphology-pressure-on-water-quality.pdf](#)

The Forum acknowledges there are three Sectoral Action Work Plans published to address hydromorphology as a pressure on WFD status, one lead by the DHLGH, the second by Inland Fisheries Ireland (IFI) and the third by the Office of Public Works (OPW).

The Forum recommends that the 4th WAP should provide a high-level overview of the interplay between these plans, and should include a table to clarify roles, responsibilities and reporting requirements across the relevant bodies, including DHLGH, OPW, local authorities, IFI, EPA and other implementing bodies, so that hydromorphological measures are not lost between sectoral mandates. This should include clearer accountability for how relevant works and programmes contribute to WFD outcomes.

Furthermore, the 4th Plan should clarify organisational responsibilities for hydromorphological pressures, including drainage, flood relief works, barriers, river continuity and physical modification of water bodies.

Building on the 3rd WAP's recognition of physical modification as a significant pressure, the 4th WAP should strengthen how hydromorphological pressures are translated into targeted measures at catchment and waterbody scale. Where drainage, channelisation, barriers, altered river continuity or other physical modifications are contributing to failure to meet WFD objectives, CMWP should clearly identify the restoration or mitigation measures needed, the body responsible for delivery, and how progress will be assessed against ecological recovery.

Pressure: Forestry

Background to the Pressure from Forestry, taken from the EPA, 2024.

Forestry accounts for approximately 12% of land use in Ireland, where approximately half is under public ownership, mainly managed by Coillte, and half is under private ownership.

Forestry has been identified as the third most prevalent significant pressure, impacting approximately 12% of all surface waterbodies that are 'At risk' of not achieving their environmental objective under the WFD. Forestry impacts a relatively high proportion of waterbodies with a High Ecological Status objective (22%) which are often upland vulnerable catchments in the headwaters of streams. These high-status headwaters are important 'biodiversity reservoirs' that play a role in restoration further downstream.

The most common water quality problems arising from forestry and associated activities relate to the release of sediment and nutrients to the aquatic environment, hydromorphological impacts (physical alteration to aquatic habitats) and acidification. Water quality data show that the impacts occur during major forestry operations such as afforestation, deforestation and/or thinning. During the intermittent periods, however, when the forests are stable, water quality can recover and can be maintained. Stable, well designed forests, with appropriate setback distances from watercourses, can therefore also be a measure to protect water quality.

Fine sediment (such as sand, silt, clay and organic soils) fills the spaces between coarser material in the stream bed and can interfere with aquatic ecosystem functions, particularly in the more sensitive high-status waters.

Nutrient losses give rise to eutrophication (excessive growth of plants and algae) in our waterbodies. The key nutrients causing impact from forestry are phosphorus and ammonium. Nutrient sources are often associated with specific forestry operations and can be intermittent and temporary.

Land drainage and channel maintenance as part of forestry operations can cause physical alteration to the bed and banks of watercourses, including widening, deepening and straightening, which lead to modification of stream flow and levels, and channel forming processes.

Acidification impacts occur when the pH of waters drops below levels that can sustain healthy aquatic ecology, for extended periods of time.

EPA, 2024. Impacts of pressures on water quality: Forestry. [Impacts-of-Forestry-on-water-quality.pdf](#)

The Forum welcomes the publication of the Forestry SAWP, which provides a detailed overview of forestry measures aligned to the 3rd WAP. The Forum acknowledges that many of its recommendations in relation to the Forestry SAWP have been included in the plan.

Similar to agriculture, there is a broad range of socio-economic benefits of forestry, including timber production, primary processing and secondary processing (etc. MDF, OSB, fibre board door facings, wood energy products) which then support the construction industry.

The Forum supports that the Forestry SAWP acknowledges the challenges related to forest management and harvesting operations where site conditions are sensitive in relation to water and aquatic ecosystems. The Forum also supports the statement that *“the reforestation stage provides a unique opportunity to design forests that respond to these and other sensitivities, with the introduction of (e.g.) large water setbacks, drain blocking and species diversification”*.

While the Forum welcomes that the Forestry measures in the SAWP has tagged the multiple benefits for each of the measures (e.g. water quality, climate, biodiversity, flood mitigation), the Forum would still like to see more links to specific issues of water quality. **The Forum recommends that the SAWP is further strengthened by including more information about what measures will address sediment, nutrient pollution, altered habitats, acidification, chemical pollution and organic pollution.**

The Forum recommends that the 4th Plan includes an action to engage with forest owners, relevant Departments and agencies (e.g. Coillte, IFI) to develop appropriate management approaches for the ‘legacy forests’ that are impacting on the 216 waterbodies. This should assess the socio-economic constraints (including timber production and the carbon balance) of forest management and explore and support alternative approaches to meet the WFD objectives.

This approach would be in line with one of the recommendations made by the Independent Advisory Council for Nature Restoration, who recommended that efforts for nature restoration should be focused on public lands. There may be legacy forests on peat soils where restoration of natural bogs may be identified as an appropriate measure. Where peatland restoration is proposed as the most appropriate management option for a site, the provision of supports to enable this should be considered.

Education

The Forum welcomes the action in the Forestry SAWP for continual engagement with key stakeholders, including forest owners, as a preventative measure to prevent all water related incidents.

To strengthen this engagement, the Forum recommends that the 4th Plan should include an action to develop a forestry education programme (similar to what the Forum is recommending for Agriculture), whereby forest owners, registered foresters and forestry contractors are directly informed about the range of waterbodies at risk from forestry and how the Forestry SAWP is proposing to support improvements.

Enforcement

While the Forum supports the targeting of inspections to the 216 waterbodies at-risk from forestry, it is not clear whether inspections of forestry operations at these sites is sufficient to restore these waterbodies to good or high status.

The Forum is of the view that there should be stronger deterrents to licence-specific conditions not being implemented, for example through sanctions to deter malpractice in forestry operations.

Pressure: Urban Wastewater

Background to Urban Wastewater as a Pressure, taken from EPA, 2024

Discharges from urban wastewater treatment plants and agglomeration networks have been identified as the fourth most prevalent significant pressure on WFD status. Nearly 200 waterbodies or 12% of all waterbodies 'At Risk' of not achieving their environmental objective under the Water Framework Directive are due to the pressure from urban wastewater water.

Direct discharge of nutrients from urban wastewater treatment plants and discharge from combined storm overflows, or storm water overflows, from the sewer network are the most common water quality problems associated with urban wastewater.

Elevated concentrations of microbes, such as E. coli, viruses and other pathogens in the wastewater may impact public health at bathing and shellfish waters.

Overall, the number of At-Risk waterbodies with urban wastewater identified as a significant pressure reduced from 289 based on an assessment in 2015, to 197 in the recent 2021 assessment. This improvement reflects the ongoing investment by Uisce Éireann in improving the wastewater treatment infrastructure.

EPA, 2024. Impacts of pressures on water quality: Urban Wastewater. [Impacts-of-Urban-Wastewater-on-Water-Quality.pdf](#)

The Forum acknowledges that progress, albeit slow, is ongoing and the number of waterbodies at risk from urban wastewater is declining.

In its submission on the 3rd WAP (2022), the Forum recommended that next Capital Investment Plan of Uisce Eireann (RC4) should have a clear plan to fund and progress the required infrastructure to remove urban wastewater as a significant pressure on Ireland's waterbodies.

In its recent submission to the CRU on RC4 (Jan 2026), the Forum raised concerns that it was not clear from the RC4 consultation material, how many waterbodies would be addressed with this capital funding for the period of 2025-2029. The Forum also shared concerns with the CRU that three out of four under-performing deliverables of Uisce Éireann identified in the RC4 consultation material relate to the wastewater sector, which was highlighted as a persistent challenge throughout RC3.

Arcadis, the consultant supporting the CRU in its review of RC4, noted that the scope of work required for Ireland's River Basin Management Plan is extensive and Uisce Éireann

had not fully completed an initial assessment of all sites to assess the impact and scale of the need. **The Forum has significant concerns that these assessments to determine the mitigation measures to address the pressures from urban wastewater are still not complete and calls for an urgent completion of assessments to identify what changes to infrastructure and associated funding are required.**

The Forum recommends that following the publication of RC4, that the SAWP for urban wastewater is updated to present what RC4 will deliver for the 197 waterbodies at-risk from the pressure.

Similar to the recommendation made by the Forum in its submission to the 3rd Water Action Plan in 2021, the Forum calls for a clear plan and timeline for assessments of shellfish and designated pearl mussel habitats so that infrastructure requirements and other mitigation measures (e.g. nature-based solutions) can be identified and progressed.

The Forum recommends that the 4th Plan should provide direction for increased transparency and accessibility of 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.

Pressure: Domestic Wastewater

Background to the Pressure from Domestic Wastewater, taken from the EPA, 2024.

Domestic wastewater treatment systems (DWWTSs) are used to treat sewage, in the case where a house or premises is not connected to the main sewer. There are nearly half a million DWWTS within Ireland, and the majority of these are septic tanks which serve single residential houses.

Discharges from DWWTS have been identified as the sixth most prevalent significant pressure in Ireland, impacting approximately 148 (9%) of all waterbodies which have been identified 'At risk' of not achieving their environmental objective under the Water Framework Directive. These are broken down as follows:

- 78% from single house discharges;
- 20% from communal discharges and;
- Approximately 2% from unauthorised discharges that should be covered under Section 4 licences.

EPA, 2024. Impacts of pressures on water quality: Domestic wastewater treatment systems. [Impacts-of-discharges-from-DWWTS-on-Water-Quality.pdf](#).

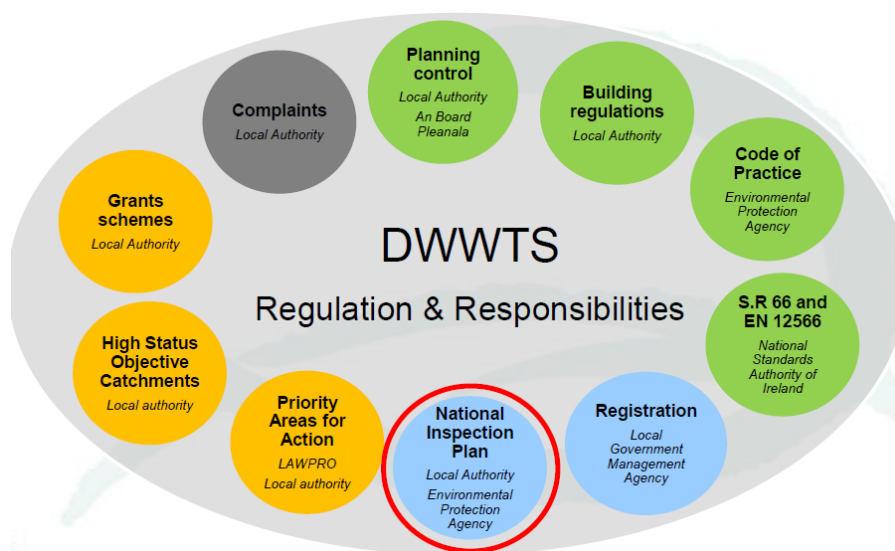


Figure 1. Illustration of the regulations, roles and responsibilities in relation to domestic wastewater treatment systems, provided by the EPA (March 2026).

The Forum received a briefing from the EPA in March 2026 as part of a pre-consultation engagement on the development of the National Inspection Plan for Domestic Wastewater Treatment Systems 2027-2031. The EPA presented how the National Inspection Plan sits in the wider regulation and responsibilities of dealing with discharges from domestic wastewater treatment systems (Figure 1).

The Forum is of the view that a Sectoral Action Work Plan should be developed for domestic wastewater treatment systems which would reflect the figure above, and incorporate the different roles and responsibilities of the leading authorities in addressing the pressure from domestic wastewater.

While the Local Authorities have a leading role in the National Inspection Plan (inspections and enforcement) and in planning and building regulations related to DWWTS, the Forum is of the view that this could be better coordinated at a higher level, for example by the DHLGH. This would facilitate a more joined up approach to accelerate action to reducing the pressures from domestic wastewater and to ensure that one element of DWWTS is not preventing progress in another. Along with the National Inspection Plan, the SAWP for domestic wastewater could include:

- engagement activities to encourage proper maintenance of DWWTS, identifying who could lead on these initiatives.
- how planning and building control could be strengthened for DWWTS (for example through follow up inspections to ensure planning permission conditions have been complied with).
- how the DHLGH grant scheme for DWWTS could be strengthened for improved access and reduced delays in closing out advisory notices.
- structured engagement between the EPA, local authorities and the DHLGH, to ensure sufficient resources are allocated for the successful implementation of the NIP.

The Forum is of the view that the 4th Plan should consider how to significantly increase the education and awareness element around domestic wastewater treatment systems. The 2026 Report published by the EPA on Domestic Wastewater Treatment Inspections (2025) indicated that of the 1,466 DWWTS inspected in 2025, 59% of them failed inspection with a significant number identified as a risk to human health and the environment. Without a significant increase in the number of inspections, education and awareness will have to be significantly strengthened so that people with septic tanks proactively maintain their septic tanks even without an inspection.

The Forum recommends that the Catchment Community Fora should consider how a community initiative to address DWWTS could be implemented in their catchment.

This should include identifying and implementing community initiatives to maintain and de-sludge their septic tanks, targeting communities in areas which have been identified as at-risk from domestic wastewater. An example of a community-led septic tank de-sludging initiative is the pilot project led by the National Federation of Group Water Schemes (NFGWS) and the EPA, [On-site Wastewater Treatment Systems \(Septic Tanks\) - National Federation of Group Water Schemes](#). This pilot project was initiated as the failure rate of septic tank inspections was almost 50% in 2016 where poor management (arising largely from lack of awareness) rather than structural issues was the predominant cause of DWWTS failure.

The project proved highly successful in raising community awareness on the need to adequately maintain a septic tank. The production of information materials that focused on their particular locality had a positive impact as householders, farmers and other businesses immediately understood that they live within a drinking water source catchment and that their activities may impact negatively on that drinking water source. The project also demonstrated that significant discounts (up to 50%) can be secured from competent contractors for the desludging of multiple tanks within a catchment as part of a community-led approach. This pilot project has been followed up by other Group Water Schemes, illustrating the success of the initiative, e.g.

- [Dysart Toonagh GWS - Awards Winners In Focus](#)
- [Stranooden GWS target septic tank pollution risk](#)

Pressure: Invasive Alien Species

The Water Forum has significant concerns with the lack of progress on addressing Invasive Alien Species (IAS) throughout the 3rd WAP.

In its submission on the 3rd WAP, two of the key recommendations made by the Forum were:

- Establish a suitably resourced, single lead Division that is responsible for Invasive Alien Species (IAS) management in Ireland, for example the National Parks and Wildlife Service (NPWS). This single lead division would ensure engagement with and coherence across various Government departments (including DHLGH and DAFM), sectors and agencies.
- A National Biosecurity Strategy should be developed that includes biosecurity guidelines and plans based on international best practice to encourage good practice such as the need for biosecurity declaration forms at ports and entry points.

The Forum also highlighted the need for adequate resourcing to support the above, and for the training, education and awareness programmes that would also be required. The Forum sent additional policy advice to the Minister of HLGH in 2023, and again in 2025, re-iterating its recommendations above. The Forum is particularly concerned that the Sectoral Action Work Plan for Invasive Alien Species is the only SAWP not published, which is due to lack of resources within the NPWS.

The Forum acknowledges the recent news that a new partnership between the National Parks and Wildlife Services (NPWS) and the National Biodiversity Data Centre (NBDC) has been established to host an Invasive Species Bureau which plans to develop a National IAS Strategy.

The Forum recommends that the resourcing requirements to support the newly established Invasive Species Bureau and to manage IAS in Ireland (across NPWS, NBDC, government departments, Local Authorities) need to be identified and addressed urgently. Research commissioned by the Forum in 2021 on IAS, indicated that the cost of inaction to manage IAS in Ireland will likely cost €26.5 billion per year by 2030 for all IAS, with aquatic and semi-aquatic IAS alone costing over €3.8 billion per year, should successful management interventions not be introduced.

The Forum recommends that a National IAS Biosecurity Strategy should be developed as a matter of urgency, which outlines the roadmap to managing IAS along with identifying key roles and responsibilities. It should also include National Guidelines and Biosecurity Protocols to ensure the best possible biosecurity practice.