



## Water Forum Submission to Uisce Éireann on the Draft National Bioresources Strategy Consultation

**16<sup>th</sup> July 2026**

### Introduction

The Water Forum welcomes the opportunity to respond to the public consultation on Uisce Éireann's draft National Bioresources Strategy.

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.

### Background

This consultation paper outlines Uisce Éireann's proposals for its long-term 25-year strategy to ensure a nationwide standardised approach for sustainable wastewater sludge and bioresources management. Wastewater sludge contains several valuable constituents such as energy and nutrients. Uisce Éireann's aim is to treat wastewater sludge effectively to recover bioresources, thereby contributing to a more sustainable circular bioeconomy. The draft strategy also reflects recent regulatory changes such as the recast Urban Wastewater Treatment Directive (rUWWTD). The Forum welcomes the draft National Bioresources Strategy and its reference to Bioresources Response Plans and the Biosolids Assurance Scheme, all of which will make progress towards filling gaps in the existing National Wastewater Sludge Management Plan. The Forum also welcomes the research and feasibility studies being carried out to investigate innovative opportunities for alternative reuse of bioresources.

# Water Forum Recommendations

## High Level Position of the Water Forum

- Key Legislation should include the EU Water Framework Directive (WFD) as the overarching legislation for water quality protection.
- The strategy should also include the EU Drinking Water Directive within its Key Legislation section.
- Identification of alternative options for dealing with sewage sludge and biosolids during Autumn should be addressed as a matter of urgency (issue raised in the 6<sup>th</sup> Nitrates Action Plan).
- Clear timelines should be put in place for the completion and implementation of research on alternative reuse options.
- Alternative reuse and recovery pathways should be prioritised in environmentally sensitive drinking water source catchments. Enhanced monitoring should be introduced in drinking water source catchments.
- The strategy needs to clearly outline national monitoring requirements for bioresources and their environmental impacts.
- Monitoring results and compliance trends for bioresources management should be published, publicly available, and accessible online to provide greater transparency.
- Periodic monitoring inspections at industry discharge points should be carried out by Uisce Éireann to ensure contaminant levels are compliant for sludge, thus providing additional oversight to the monitoring data reported by industry.
- Contractor training on best practice for the use of biosolids reuse on land should also be implemented to align with both the WFD requirements and drinking water source protection.
- Risk management and climate risk for accidental spillage or leakage to waterbodies during transportation or storage should be included for the protection of nutrient sensitive waterbodies and drinking water source catchments.

## 1. Regulatory and Policy Framework

**The Forum is of the view that the section on Key Legislation should include the EU Water Framework Directive (WFD) as the overarching legislation for water quality protection.** This should be a requirement in addition to the Nitrates Directive, which does not cover protection of waters against pollution from phosphates, pathogens, pesticides or other emerging contaminants. Furthermore, every step proposed in the National Bioresources Plan should be assessed against the WFD.

In alignment with the WFD the **Forum is of the view that the strategy should also include the EU Drinking Water Directive within its Key Legislation section** for the protection of drinking water source catchments.

## 2. Bioresources Reuse in Alternative Non-Agricultural Land Options

The Forum is supportive of the feasibility studies and the ongoing research and innovation being undertaken by Uisce Éireann in relation to alternative non-agricultural land options, as well as the proposed development of a Bioresource Response Plan. However, it should be noted that the Nitrates Expert Group recommended that “*the application of organic fertilisers with high nitrogen content and highly available nitrogen forms should not be permitted on arable land post-harvest. This restriction should apply to all organic fertilisers with high nitrogen content and availability, including **sludges and biosolids***”.

Therefore, considering the Nitrates Action Programme (NAP) measure to prohibit post-harvest application of sewage sludge or biosolids derived from sewage sludge in the Barrow and Slaney Catchment beyond 1<sup>st</sup> January 2027, **the Forum is of the view that the identification of alternative options for dealing with sewage sludge and biosolids during Autumn should be addressed as a matter of urgency to enable Uisce Éireann to implement this measure and protect the catchments from excess nutrients.** Clear timelines should be put in place for the completion and implementation of research on alternative reuse options. The challenge of identifying alternative reuse options for sewage sludge should be recognised as an urban water pressure and biosolids deployment should be aligned with Water Action Plan priorities for nutrients sensitive areas to ensure the protection or restoration of WFD status.

## 3. Drinking Water Source Protection

Sewage sludge and biosolids have the potential to impact drinking water sources and as such the bioresources strategy should take into account drinking water source protection. Similar to nutrient sensitive areas in Section 2, biosolids deployment should be aligned with the requirements of the Water Framework Directive for drinking water source protection. The Strategy should also demonstrate how decisions on bioresources management, including land application, transport and storage, will be integrated with Uisce Éireann's existing Drinking Water Source Protection Sectoral Action Plans and Drinking Water Safety Plans. **The Forum is of the view that alternative reuse and recovery pathways should be prioritised in environmentally sensitive drinking water source catchments.**

Furthermore, the **Forum is of the view that Uisce Éireann should introduce enhanced monitoring in drinking water catchments**, taking into account the risks that land spreading practices on different soils, transportation and storage may have on drinking water sources, as discussed in the section 4 below.

## 4. Bioresources Monitoring and Reporting

### 4.1 National Monitoring Requirements

The Forum is supportive of the progress made on the Biosolids Assurance Scheme and Uisce Éireann's collaborative role with DAFM, the EPA and the DHLGH on the online organic nutrient movement system, land spread mapping and Sewage Sludge Directive. The Forum acknowledges that there is ongoing regulatory monitoring and traceability systems in place and that these will be updated to include rUWWTD requirements. However, to implement consistency across systems, **the Forum is of the view that the strategy needs to clearly outline national monitoring requirements** indicating current and future parameter requirements under the rUWWTD, including emerging contaminants. Sampling frequency of these parameters should be defined, and any additional risk-based monitoring should also be specified.

### 4.2 Independent Verification and Data Transparency

The Forum is of the view that **national monitoring results and compliance trends should be published, publicly available, and accessible online to provide greater transparency.**

### 4.3 Monitoring of Industry Discharges

**The Forum is of the view that Uisce Éireann should also carry out periodic monitoring inspections at industry discharge points to ensure contaminant levels are compliant for sludge, thus providing additional oversight to the monitoring data reported by industry.** While it is acknowledged that leachate is monitored, relying on influent and effluent monitoring does not give the complete picture of where pollutant exceedances may be coming from and thus cannot pinpoint where action needs to be taken by individual industries.

### 4.4 Contractor Inspections

The Forum welcomes that contractor inspections will be required to insure compliance with best practice for the use of biosolids reuse on land, in line with Uisce Éireann's Standard Operating Procedures and is of the view that **contractor training on best practice for the use of biosolids reuse on land should also be implemented to align with both the WFD and drinking water source protection.**

## 5. Wastewater Sludge and Bioresources Transport and Storage

The Forum is of the view that **a section on risk management and climate risk for accidental spillage or leakage to waterbodies during transportation or storage at Bioresource Infrastructure Centres should be included for the protection of nutrient sensitive waterbodies and drinking water source catchments.** This could be included within the Biosolids Assurance Scheme (BAS) mentioned in Section 11 of the draft Strategy.