Water Forum Submission to the Environmental Protection Agency on the draft National Inspection Plan for Domestic Wastewater Treatment Systems 2027-2031

9th October 2026

Introduction

The Water Forum welcomes the opportunity to respond to the public consultation of the Environmental Protection Agency (EPA) National Inspection Plan for Domestic Wastewater Treatment Systems (DWWTS).

The Water Forum has a statutory role to advise the Minister for Housing, Local Government and Heritage on water policy, and to advise the Water Policy Advisory Committee in relation to the implementation of the Water Framework Directive. This National Inspection Plan (NIP) for Domestic Wastewater Treatment Systems (DWWTS) is therefore of direct relevance to the Forum, through both the need to support water and wastewater services in rural Ireland, and also to protect Ireland's water resources from the pressures of domestic wastewater.

Water Forum Recommendations

Strand 1: Inspections

The Water Forum supports the risk-based methodology being proposed for the National Inspection Plan (NIP) which prioritises inspections in areas where failing DWWTS would pose a higher relative risk to the environment via pollution of waterbodies and human health via exposure to inadequately treated waste water or the contamination of drinking water wells.

The Forum welcomes the increase in the number of inspections for the 5th NIP, albeit a small increase (Table 1). The Forum is still of the view that more inspections should be done in Zone 1, to accelerate action to reduce domestic wastewater as a pressure on our waterbodies.

Table 1: The number of planned inspections for the three zones in the current NIP (2022-2026) and the 5th NIP (2027-2031).

	Number of Planned Inspections per NIP cycle	
	4th NIP (2022 – 2026)	**5th NIP (2027 – 2031)**
Zone 1 – increased risk to the environment	2400	2500 *(~ 42% of the 6000 dwellings)*
Zone 2 – increased risk to human health	2400	2500 *(~10% of the 25,000 dwellings)*
Zone 3 – lower risk to human health and the environment	1000	1800 *(~0.4% of 469,400 dwellings)*

In its review of the current NIP for DWWTS (2022-2026), the EPA reviewed the percentage of total inspections completed in each risk zone between 2022 and 2025 against the allocated percentage of inspections required under the NIP. This illustrated an under-allocation of inspections by local authorities to risk Zones 1 and 2 (over 600 inspections short each Zone) and an over-allocation of inspections to Zone 3 (over double the amount of the original requirement).

Table 2: Number of inspections required in each zone compared with the number of inspections completed, indicating a shortfall of inspections in Zones 1 and 2.

	% Inspections carried out between 2022-2025.	
	Required %	**Completed %**
Zone 1	41%	29%
Zone 2	41%	30%
Zone 3	18%	41%

The Forum has concerns that the risk-based approach is not currently being implemented fully, with a shortfall in inspections in the two zones identified as a high risk to the environment or the human health. **The Forum recommends that as part of the annual review of Local Authority inspections, that the EPA analyse and publish the number of inspections against the three zones, so that it can be observed at an early stage if there is a shortfall in inspections in any particular zone.**

Strand 2: Education

The Forum is concerned that following inspection, the failure rate of septic tanks was 56% in 2024, consistent with previous years. The majority of the failures are related to simple, preventable measures such as maintenance or desludging the septic tank.

The Forum acknowledges that the draft 5th NIP presents high-level guidance on the types of engagement activities which could be done by local authorities and by the EPA under the NIP. However, without clear targets and trackable metrics, these engagement activities could be considered as 'nice-to-do' rather than essential activities.

The Forum recommends that as part of the 5th NIP, the EPA should set targets/metrics for education and engagement activities for each local authority, similar to the approach done for inspections. The objective of engagement activities should be to educate on the need to adequately maintain septic tanks and reduce the failure rate identified in annual inspection reports.

The Forum also recommends that Local Authorities should have to report on engagement activities annually, along with their inspection numbers. This would ensure that Strand 2 of the NIP is also tracked and reported on.

Engagement activities 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