Water Forum Submission to Uisce Éireann on the Small Wastewater Treatment Plant National Plan Issues Paper Consultation

20th October 2026

Introduction

The Water Forum welcomes the opportunity to respond to the public consultation on Uisce Éireann's Small Wastewater Treatment Plant Issues Papers.

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 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 the development of the *Small Wastewater Treatment Plants National Plan: Supporting Communities while Protecting our Natural Environment* to improve how wastewater services in small communities across Ireland are provided for and managed. The Plan will develop a national level strategy to identify where and what upgrades are needed, how they should be assessed, and how investment can be targeted where it will have the greatest benefit in supporting the future growth and development of homes and business in small communities while also protecting our rivers, lakes and coastal waters. The Forum welcomes the proposal for a Small Wastewater Treatment Plants National Plan and the opportunity to advise on any issues prior to the development of the draft plan.

Water Forum Recommendations

The Forum supports the development of a national plan that considers and evaluates both the needs of communities and protecting the environment, along with the ambition that this plan could speed up the process of delivery of essential wastewater treatment infrastructure. Presentation of the current situation for all small WWTPs together also increases transparency and accountability, showing the public the challenges faced when addressing wastewater issues across the country. The Forum also supports the link between the proposed plan and meeting the needs of the urban wastewater treatment directive (UUWTD), the Water Framework Directive (WFD) and Ireland's 3rd Water Action Plan. With this in mind, the Forum would like to make the following recommendations:

1. The Forum welcomes that standardisation of design will help speed up the delivery of wastewater treatment infrastructure. However, hydrological, environmental and future climate conditions may vary widely throughout the country. The Forum recommends that the plan outlines a suite of different standard design options that would be suitable depending on the hydrological and environmental conditions. Standard Designs should also consider how these conditions may change in the future including periods of low river flows due to drought conditions and the intensified pressures on small WWTPs during periods of increased heavy rainfall.

2. The Forum is of the view that the Plan would need to highlight the benefits of the risk-based, tiered assessment model over the site-by site approach, to ensure environmental responsibilities are not being avoided. The Forum recommends that the plan clearly sets out, in table format, how different factors are balanced by considering environmental risk, drinking water protection, housing needs, community benefits and the condition of the small WWTP. This gives clarity to the risk-based prioritisation of treatment plants and demonstrates transparency within the decision-making process.

3. The list of regulations in the Issue Paper does not include the Drinking Water Directive or Drinking Water Regulations. The Forum recommends that these are included in the National Plan to safeguard drinking water sources located near existing or proposed small WWTPs.

4. Many of the small WWTPs are located in the South and South East where nitrates are already a pressure, the upgrade of small WWTPs located in nitrate sensitive areas should be a priority (where the upgrade would contribute to nitrate reduction efforts in the catchment).

5. The Forum recommends that nature-based solutions should be considered where possible, including their whole-life costs and co-benefits for biodiversity and the community.

6. The Forum is of the view that the Small WWTP National Plan presents an opportunity for Uisce Éireann to engage with communities in a positive way about wastewater treatment solutions for the community. It also provides an education opportunity for Uisce Éireann to engage with communities on how their wastewater treatment plant works with the aim of increasing understanding and communicating the benefits of these systems.

7. The Forum recommends that in identifying benefits for the communities Uisce Éireann should consider how high value water environments are identified and included in the evaluation, to steer the prioritisation of investment (e.g. identify the societal values like impacts to recreational activities or bathing waters, impacts on drinking water sources, impacts on housing and growth).

8. The Forum recommends that the plan should outline a long-term maintenance strategy for small WWTPs, including how digital technologies can be used for remote monitoring and early warning systems.

9. The Forum recommends that the plan should include a timeline for implementation and achievable target dates for completion of both assessments and upgrades for all small WWTPs.