



**SUBMISSION TO THE DEPARTMENT OF HOUSING,
PLANNING AND LOCAL GOVERNMENT**

**CONSULTATION PROCESSS IN RELATION TO THE WATER
ENVIRONMENT (ABSTRACTIONS) BILL 2018 (General
Scheme)**

OCTOBER 2018



Introduction to An Fóram Uisce

An Fóram Uisce (the Water Forum) was established in June 2018 in accordance with the provisions of Part 5 of the Water Services Act 2017. An Fóram is the only statutory body representative of all stakeholders with an interest in the quality of Ireland's water bodies. An Fóram consists of 30 members including representatives from a wide range of organisations with direct connections to issues relating to water quality and also public water consumers. Approximately 50 different organisations were involved in the nomination of members.

Consultation regarding Water Environment (Abstractions) Bill 2018

An Fóram welcomes the drafting of the Water Environment (Abstractions) Bill 2018 as an important step in the implementation of the River Basin Management Plan for Ireland 2018 – 2021 and working towards compliance with the requirements of the Water Framework Directive. It is also noted that the abstractions register has recently been opened which is also to be welcomed.

It is understood that the EPA has estimated that no more than 6% of water bodies are potentially at environmental risk due to abstraction pressures. While this appears to be low, in the context of overall pressures, it still is of concern and having regard to recent weather events experienced in the country, An Fóram is concerned with potential further pressures posed by similar weather events in the future and the on-going impact of climate change.

In addition to this, in its role in the context of water services, An Fóram has a concern in relation to the protection of public and rural water sources which are served by abstractions. The Group Scheme Sector in particular is heavily reliant on such sources. Having regard to the importance of such services, and the impact of drought conditions in relation to same, An Fóram considers it important that priority is given in any decision making process to securing water abstractions for drinking water purposes.

One of the main issues of concern with the draft Bill is the setting of the exemption threshold for registration at 25 cubic metres. While it is appreciated that abstractions below this threshold are relatively minor in themselves, their registration would assist in developing a greater level of understanding in terms of catchment information. Further,

while one low volume abstraction may not of itself be a concern, the cumulative effect of a number of such abstractions within any one catchment may result in concerns. Bearing these considerations in mind there is a view within An Fóram that the exemption level should be reduced to 10 cubic metres. Should such a level pose an administrative burden in the early stages of establishing the register, then perhaps a phased approach over a period of time could be adopted.

The position with regard to temporary abstractions is noted and An Fóram would like to be consulted in relation to same in due course.

Finally, An Fóram is concerned that there appears to be a low level of awareness amongst the public in general and in particular amongst those to whom these proposed provisions apply. While it is understood that there have been consultation with some of the sectors, it is considered that a public awareness campaign might be advisable. Not only would this lead to advising those affected by the registration requirements but would also lead to greater public awareness with regard to the importance and vulnerability of our water environment.

Conclusion

An Fóram would like to thank the Department of Housing, Planning and Local Government for this opportunity to submit in relation to the proposed legislation and hopes that its views will be of assistance in finalising same and is available to assist in any way it can in relation to this process.

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