

Submission on the Preliminary Review of the Water Services Policy Statement

The Forum acknowledges that the in line with the Water Services Policy Statement 2018-2025, that a review of the policy statement would be undertaken in 2022. The Forum welcomes the opportunity from the Department of Housing, Local Government and Heritage (DHLGH) to provide a high-level response to this preliminary review process.

The Forum has a number of recommendations following a review of the current Water Services Policy Statement:

1. The Forum recommends that a new Water Services Policy Statement is required to take account of the significant changes which have happened across the Water Sector in Ireland since the first statement was developed in 2018.
2. The Forum recommends that the new Water Services Policy Statement should be developed in the context of integrated catchment management. The central concept of the Water Framework Directive (WFD) is integration, which is seen as the key to the management of water within river basin districts. In 2020 the Water Forum adopted the Framework for Integrated Land and Landscape Management (FILLM) as the overarching framework for not only catchment management, but also environmental management. FILLM provides a means of connecting different policies, such as the Water Framework Directive, Urban Waste Water Treatment Directive, Habitats Directive, Floods Directive, Drinking Water Directive, climate change adaptation and mitigation, and spatial planning. FILLM provides an opportunity to achieve policy coherence and strategic synergies between water policy and other policy priorities such as, economic development, climate action, drinking water source protection, sustainable development, agriculture and tourism. The Forum recommends the Framework for Integrated Land and Landscape Management approach is also incorporated into the Water Services Policy Statement, as this systems-based approach can prioritise actions for water, climate and nature that have the largest synergetic impact, identifying synergies and trade offs, and ensure optimum results for the efforts and resources used.
3. The Forum is cognisant of the Land Use Review which has commenced, being led by the EPA who are working with government departments and agencies to compile the relevant data. The Forum recommends that consideration of this review is included in a new policy statement, where land planning should take account of all environmental components in a holistic way, with cross component planning to ensure requirements of the various directives (including the WFD and UWWTD) are met.
4. A new policy statement should take account of the urgency required to address compliance for the treatment of urban wastewater; the European Commission, in a report on the 2022 Environmental Implementation Review for Ireland, highlighted the 'low compliance rate

with the Urban Waste Water Treatment Directive due to the large number of non-compliant agglomerations', stating that further efforts are needed "to provide biological treatment to additional 50.5% p.e of urban waste water, as well as biological treatment to remove nitrogen and/or phosphorus from a further 75.1% p.e. of urban wastewater'.

5. Furthermore, a new Water Services Policy Statement will need to take account for the change to a 5-year investment cycle with Irish Water, and a new Policy Statement starting in early 2023, would support the development of Irish Water's next investment cycle, RC4.
6. The Forum recommends that a new Water Services Policy Statement should strengthen the role of the Rural Water Sector in the delivery of water services in rural Ireland and outline the required investment to support the sector.
7. While the 3rd River Basin Management Plan (RBMP) has not yet been finalised, it is expected that there will be considerable changes to the management of Ireland's water resources in line with the requirements of the Water Framework Directive. The Water Services Policy Statement should be clearly aligned with the programme of measures outlined in the 3rd RBMP.
8. The Forum have called for a focus on waterbodies in the 3rd RBMP and to develop targeted actions to meet their WFD objectives. In line with the Forum's submission on the RBMP, a new Water Services Policy Statement should include the investment requirements to address all water bodies at risk from urban wastewater (i.e. 208 waterbodies), not just the priority areas for action (which is the approach in the current Policy Statement).
9. The Forum is aware that as part of the Recast of the Drinking Water Directive, measures for catchment management and drinking water source protection will be required; the new Water Services Policy Statement will have to include the investment requirements to support their development and implementation. Furthermore, there will need to be a clear outline of roles and responsibilities across the water sector and ensure they are adequately resourced to carry out their function to meet the requirements of the Recast of the Drinking Water Directive.
10. In relation to water conservation, while leakage should continue to play a significant part of this theme, there should be a similar emphasis on the use less and waste less elements through revised building regulations, water efficiency labelling on fittings and appliances, incentives for use of water efficient technologies and appliances, along with education and awareness delivered nationally and at a local level.
11. While the Forum will continue to advise on water conservation in line with the current Water Services Policy Statement, the Forum recommends that the Government will need to take responsibility for a National Water Conservation Programme and lead on a National Water Conservation Team to define and implement water conservation measures and the policy changes which will be required.
12. In relation to future proofing of water resources, the Forum recommends that the Climate Adaption Sectoral Plan for Water should be revised to take a wider look at the expected impacts climate change will have on our water services (both water quality and water quantity).
13. Furthermore, Irish Water and the Group Water Sector should have clear contingency plans for climate change scenarios, with detailed regional plans for both flood and drought management.
14. In relation to both the quality and future proofing themes of the water policy statement, all opportunities to minimise the impacts of wastewater on both the environment and human health should be considered. Along with increasing the capacity of infrastructure for urban wastewater treatment, Ireland will need to explore opportunities for nutrient recovery from

wastewater, (in addition to what is already planned for the Ringsend wastewater treatment plant), along with increased opportunities for nature-based solutions and source separation or composting technologies for new developments. Nutrient recovery from wastewater and re-use as fertiliser, will also supports Ireland's efforts for achieving a circular economy.

15. While the Forum welcomes Appendix 2 of the current Water Services Policy Statement which gives a summary description of relevant public and statutory bodies, the Forum recommends there should be further clarity in roles and responsibilities, to ensure there is accountability in the next Policy Statement.

While this document highlights the high-level recommendations by the Forum for consideration by the DHLGH, the Forum would welcome future opportunity to respond in more detail to a draft Water Services Policy Statement, should a new statement be developed.