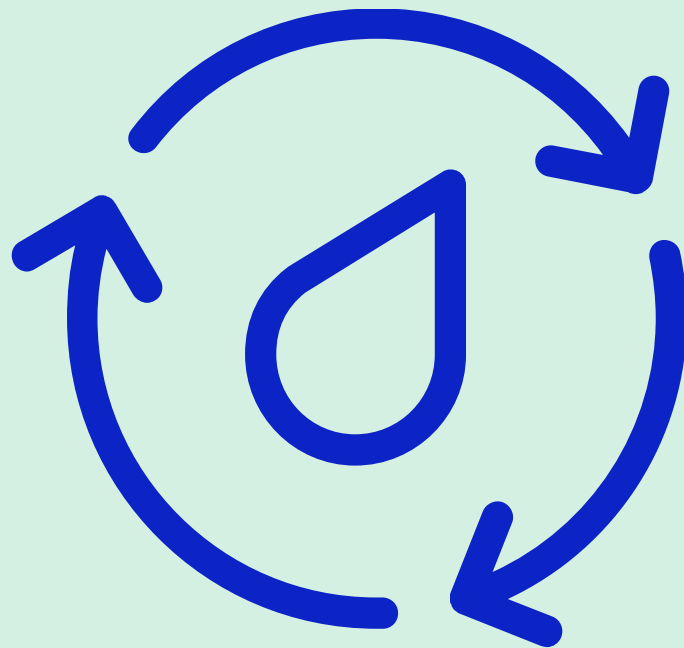


Post Consultation Report

Draft Water Services Strategic Plan 2050

Public Consultation Report for the
draft Water Services Strategic Plan
2050.



Safeguarding our water for our future

If you have any questions or need more information please contact us:

Contact details

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www.water.ie

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Uisce Éireann
PO Box 860
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Consultation inquiries or feedback

9am – 5.30pm, Mon-Fri

Email:
wssp@water.ie

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1 Introduction

The Water Services Strategic Plan (WSSP) presents our objectives for the next 25 years and the means by which we will achieve them. It aligns to requirements set out in the Water Services (No. 2) Act, 2013. The Water Services (No. 2) Act, 2013 provides for Ministerial Direction on the form and content of this Water Services Strategic Plan and sets out the requirement for the plan. The Water Services Strategic Plan 2050 will present our strategic objectives to 2050, aligning to our vision, grouped into a series of themes. It will also consider how we might achieve these objectives in the short and medium term and what we need to focus on to achieve longer-term success. It is one of a suite of documents guiding the delivery of water and wastewater services in Ireland.

Strong partnerships will underpin our approach to planning for the future, with the aim of delivering mutual benefits and value. Through the delivery of our Water Services Strategic Plan 2050, we will build on the legacy of our local authority water services heritage, working with our customers, communities, and stakeholders to enhance our shared environment and support social and economic development. We will aim to lead by example and embrace research and innovation, integrating new technologies and sustainable practices to secure safe and reliable water supply into the future while protecting the environment.

1.1 Benefits of the WSSP

Our existing Water Services Strategic Plan was published in 2015 and covered the 25-year period 2015-2040 and included six Strategic Objectives. Now, almost 10 years on and having considered the possible long-term future scenarios and challenges that are likely to emerge taking account of the global megatrends through our Vision 2050 study, we have developed four strategic objectives to address the key challenges affecting the delivery of water services from now to 2050.

Under each strategic objective, we have identified strategic aims and key actions that will help us to address our most critical challenges, and to ensure that we continue to deliver water services for the long term.

These objectives and aims align with the Water Services (No.2) Act, 2013 and outline the direction of travel and steps that we will take over the next 5-10 years to deliver on our long-term objectives.



Figure 1 Strategic Objective, Aim and Actions.

1.2 Why do we need a WSSP?

The Water Services Strategic Plan 2050 is an essential part of ensuring that as Ireland's national public water services provider, Uisce Éireann can ensure the availability of safe drinking water and the collection and treatment of wastewater before it is safely returned to the environment. It will help us ensure that we have an environment that is protected from the impacts of wastewater discharges, and that we have efficient modern systems that meet the needs of customers, contribute to economic growth and development, and provide value for money.

Delivering on the WSSP 2050 over the next 25 years will require an unprecedented transformation in how the industry operates and increased levels of investment. The Water Services Strategic Plan 2050 sets out the challenges and opportunities we face as a country in relation to the provision of water services and identifies strategic national priorities. It includes Uisce Éireann's short-, medium- and long-term objectives and identifies strategies to achieve these objectives.

Our water infrastructure is already under increasing pressure to meet the current demand for water due to population and economic growth, climate change, our changing environment and changes in legislation such as the introduction of new abstraction

licenses. The quality of our drinking water can be affected in many ways including soil or rock types, land use practices, pollution, and even heavy rainfall. To prevent unplanned water outages, water conservation orders, reductions in water pressure, or restrictions to water supplies, we have to plan ahead. How we choose to plan our water resources today will determine the water supply we can provide now and into the future.

Under the Water Services (No. 2) Act 2013, Uisce Éireann is required to submit a Strategic Funding Plan to the Minister within three months of the publication of the Policy Statement. This Strategic Funding Plan reflects the principles, themes and policy objectives identified in the Policy Statement and the objectives outlined in WSSP 2050.

It is the Strategic Funding Plan that will outline the costs, both operational and capital, associated with the arrangements that Uisce Éireann proposes to make and measures that it intends to take to implement the objectives of WSSP 2050. The alignment of policy and investment will help ensure Ireland has secure, resilient, high-quality water supplies and appropriate levels of wastewater treatment.

2 Consultation Process

2.1 Consultation 1

Key stakeholders, Uisce Éireann regulators and statutory bodies were engaged during Phase 1 on the Issues Paper and Strategic Environmental Assessment (SEA) Scoping Report and Appropriate Assessment (AA) Screening. The Issues Paper was prepared to support the development of the draft WSSP 2050. It summarises the key issues influencing our organisation and the services we deliver from now to 2050. The issues identified in this Issues Paper, along with the Uisce Éireann vision, are the foundations that helped to define long-term objectives presented in the draft WSSP 2050. The aim was to engage with our stakeholders to ensure we identified the issues important to them so that a robust draft WSSP 2050 was developed that represents our shared values.

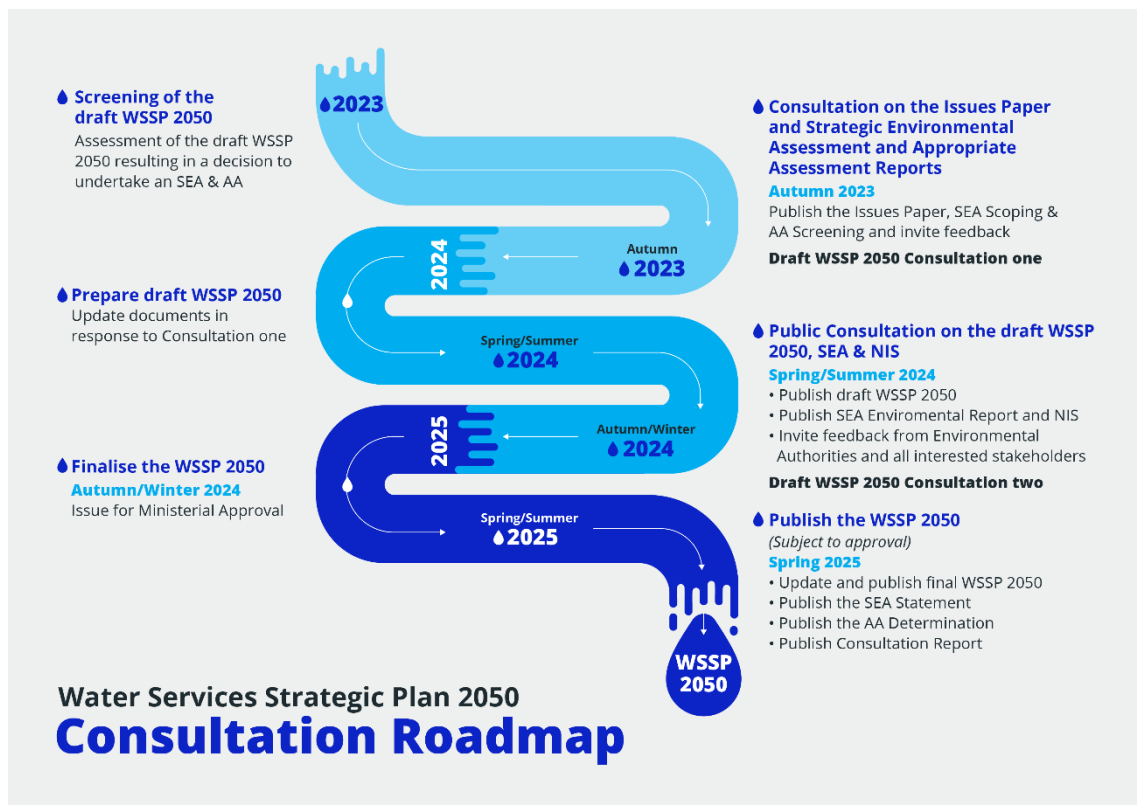


Figure 2 WSSP 2050 Consultation Roadmap

The first round of consultation ran for ten weeks in autumn 2023. The Issues Paper, SEA Scoping Report and AA screening was provided for consultation for the purposes of supporting the delivery of an effective and engaging public consultation two on the draft WSSP 2050 and associated environmental reports in Phase 2. Consultation 2 on the draft WSSP and associated SEA and AA was a full public consultation and ran for eight weeks. Feedback was sought from statutory and key stakeholders, Uisce Éireann customers and the public.

2.2 Key Stakeholder and Environmental Authorities engagement

In Phase 1, we wanted to ensure that insights from key stakeholder groups supported the delivery of an effective and engaging statutory consultation on the draft WSSP 2050 and associated environmental reports in Phase 2. This approach made certain that:

- The context for the WSSP 2050 was framed clearly and appropriately.
- The timeline of the plan delivery is achievable.
- We managed public engagement at the right time to ensure maximum levels of public engagement were achieved.

Uisce Éireann's aim was to have the purpose and objectives of the draft WSSP 2050 robustly reviewed and consensus with regulatory and statutory stakeholders agreed before going to the public.

On 19 September 2023, Uisce Éireann launched Consultation One to key stakeholders including environmental authorities. The stakeholders received an invitation to a hybrid workshop, held online and in-person, with the WSSP Project Team. The environmental authorities were:

- Environmental Protection Agency (EPA)
- Department of Housing, Local Government and Heritage (DHLGH)
- Department of the Environment, Climate and Communications (DECC)
- Department of Agriculture, Food and Marine (DAFM)
- Northern Ireland Environment Agency (NIEA)
- Commission for Regulation of Utilities (CRU)
- An Foram Uisce (AFU)

3 Consultation Two

3.1 Introduction

Uisce Éireann undertook a public consultation on the draft Water Services Strategic Plan 2050 in accordance with the consultation requirements of the SEA Regulations. Consultation Two also included an opportunity to make submissions on the accompanying SEA report and on the NIS relative to Appropriate Assessment matters that are required to be taken into account in the AA process.

Uisce Éireann's consultation and engagement processes are in line with the public participation requirements of the Aarhus Convention, along with the requirements for public consultation for the purposes of the SEA Directive and Habitats Directive. Our public participation process includes different phases with reasonable timeframes in excess of the statutory minimums under the SEA Regulations, allowing the public to be informed, and for the public to participate effectively during the decision-making process.

Uisce Éireann commits to continuing to provide communications and public consultation that are accessible, meaningful, transparent, proportionate and accountable for all stakeholders including those without a technical background. These principles have underpinned the approach Uisce Éireann has taken to the communications and public consultation for the Water Services Strategic Plans to date.

Throughout the development of the draft Water Services Strategic Plan 2050, Uisce Éireann has consulted with members of the public and all interested stakeholders in accordance with the following legislative, planning and best practice requirements:

- Aarhus Convention requirements
- Strategic Environmental Assessment (SEA) Directive requirements
- Habitats Directive requirements
- Irish legislation requirements
- International best practice including Gunning Principals and International Associations for Public Participation Guidelines (IAP2)

3.2 Consultation Two

The draft Water Services Strategic Plan 2050 was issued for consultation on 21 May 2024, with consultation closing on 30 July 2024.

In order to assist stakeholders in making a submission as part of this public consultation, people could avail of two submission options. Stakeholders were welcome to complete one

or both options when making a submission. However, this was just an aide and all relevant submissions received in response to the consultation were considered.

Option 1: Stakeholders were invited to complete an online survey.

Option 2: Stakeholders were also invited to provide feedback on the following consultation questions.

Question 1: In Section 4 we present our four Strategic Objectives. Do you have any comments on the Strategic Objective and associated strategic aims and actions?

Strategic Objective 1: Safe and Reliable Drinking Water

Strategic Objective 2: Protect and restore our environment.

Strategic Objective 3: Support our customers, communities and the economy.

Strategic Objective 4: Resilient services fit for the future.

Question 2: In Section 2 we have identified the biggest challenges we think will influence how we deliver our water services to 2050. Do you have views on these challenges?

Question 3: In Section 8 we outline our approaches to meeting long-term challenges. Do you have any comments on these?

Question 4: Do you have any comments on the Strategic Environmental Assessment (SEA) Environmental Report and Natura Impact Statement (NIS), which accompany the draft WSSP 2050?

A number of communications tools were developed to promote the consultation and to raise awareness among the public, interested parties and environmental authorities and to encourage participation in the consultation process.

The following communications tools were used:

- WSSP 2050 webpage on the Uisce Éireann website
- Consultation brochure available in English and Irish
- Draft WSSP 2050 infographics
- Draft WSSP 2050 consultation roadmap
- Press releases to national media

- Newspaper advert
- Online briefings
- Online public webinars
- Recorded webinar uploaded on the WSSP 2050 webpage
- Social media
- Consultation video, outlining the plan and how to get involved
- Public display of hardcopy documents
- Correspondence and briefings with:
 - environmental authorities
 - elected representatives
 - local authorities
 - interested parties
 - media
 - general public

These communications tools and channels are discussed in more detail in Chapter 4.

4 Consultation Two Promotion

4.1 Draft WSSP 2050 Webpage

A dedicated sub webpage was created with details of the Phase 2 consultation. This went live on the 21 May 2024. An Irish version of the webpage was also made available.

The draft WSSP 2050, the SEA Environmental Report and the NIS were made available to view or download from the webpage on 21 May 2024, along with all other relevant information, including the draft WSSP 2050 brochure, consultation roadmap and a draft WSSP 2050 infographic. Details on how to participate in the consultation were included on the draft WSSP 2050 webpage. Submissions were invited via the following channels:

Email: wssp@water.ie

Post: National Water Resources Plan, Uisce Éireann, P.O. Box 13216, Glenageary, Co. Dublin

Consultation Survey

For the period of the draft WSSP 2050 consultation (between 21 May and 30 July 2024) there were 7,446 page views and 1,716 unique users of www.water.ie/wssp.

4.2 Consultation Video

A consultation video was created as a visual aid illustrating the draft WSSP 2050 consultation. The animation aids communication, through an alternative format to text, assisting our efforts to effectively inform as broad a demographic as possible. The video with a voice over and both English and Irish captions and was available on the website.

4.3 Consultation Two Brochure

A consultation brochure outlining the draft WSSP 2050, details of the consultation questions and information on how stakeholders could provide feedback on the draft WSSP 2050 and associated environmental reports was published on the draft WSSP 2050 webpage on 21 May 2024.

The brochure provided a summary of the draft Plan, how the draft Plan will be delivered and the next steps.

The brochure was made available in both English and Irish and available on the website www.water.ie/wssp. A copy of the English version can be found in Appendix A.

4.4 Draft WSSP 2050 Infographic

A draft WSSP 2050 infographic, titled 'At a Glance', was produced to be used in communication materials and on the webpage. The infographic is a helpful visual aid, which clearly illustrates our approach to the draft Water Services Strategic Plan 2050. The infographic aids communication, through an alternative format to text, assisting our efforts to effectively inform as broad a demographic as possible. The infographic can be found in Appendix C.

4.5 Press Release

A press release announcing the commencement of public consultation on the draft WSSP 2050, was issued under embargo to national, regional, and local media on 20 May 2024 for release on 21 May 2024. It was issued to raise awareness of the consultation amongst the general public and to increase public participation. The press release included details of the draft WSSP 2050 and information on the consultation, along with links to the documentation and all necessary information on how to participate.

A copy of the press release issued is available in Appendix D.

4.6 Newspaper Adverts

Statutory newspaper adverts were placed in The Irish Times on 21 May 2024. The consultation was extended for two weeks and an advert was placed in The Irish Times on the 16 July 2024. The advertisements were published in a national newspaper to raise awareness of the consultation across the country and to encourage participation. The advertisement advised where copies of the documentation could be obtained or viewed, the dates of the consultation, as well as the various means of engaging with the WSSP project team.

A copy of the newspaper advert is included in Appendix E.

4.7 Social Media

The launch of the WSSP 2050 consultation was promoted on social media using the Uisce Éireann Twitter, Facebook, Instagram and LinkedIn page, as displayed in Table 1 below. Promoting the consultation on these platforms enhanced the potential to inform a higher volume of people across a broad demographic.

A suite of engaging graphics and a consultation video were developed for use on social media to explain details of the draft Plan.

In total, 16 Facebook posts, 7 Twitter posts, 7 Instagram and 7 LinkedIn posts were shared. In total, 4.03 million impressions were made.

Table 1 Social Media Statistics

Platform	No. of posts	Impressions
Facebook	8	4,033,526
Twitter	8	11,540
Instagram	7	5,961
LinkedIn	7	15,601

4.8 Public Display of Documents

In order to ensure the draft WSSP 2050 and associated environmental reports were readily accessible, hard copies of the draft WSSP 2050 in English, including appendices, the SEA Environmental Report and the NIS were provided for public display in 31 local authority offices and at one county library for the duration of the consultation period.

The availability and location of these documents at the planning counter in local authority offices and at the county library was promoted through the project website, social media and newspaper advertisements. An audit of all 31 displays was undertaken by the WSSP team during the consultation period where the team confirmed that all documents were received and available for the public as advertised. In addition, hard copies and electronic copies of these reports were available upon request through the project email and phone.

A full list of the planning counters and libraries where the documents were displayed is included in Appendix F.

4.9 WSSP Freephone Phoneline

The WSSP team introduced a dedicated phoneline during this period of consultation to improve accessibility. The freephone number, 1800 46 36 76, was publicised in national

newspapers, on all of the consultation documents, and on the website. The phonenumber was staffed by the WSSP team during office hours throughout the consultation period.

4.10 Direct Engagement

At Uisce Éireann, we take the nature and quality of our relationships with all of our stakeholders very seriously. We have worked closely to understand their views and interests, to deliver the draft WSSP 2050 in partnership and respond to their interests as we progress our plan. Uisce Éireann engages with stakeholders through public consultation and ongoing engagement on our infrastructure projects and plans. We commit to continuous and responsive two-way communication, at every stage of the consultation process to ensure that information is accessible, meaningful, transparent, and accountable for all stakeholders.

4.10.1 Environmental Authorities and Key Stakeholders

The environmental authorities under SEA regulations have been engaged on numerous occasions throughout the development of the draft WSSP 2050 Plan. These stakeholders play a key role in shaping and informing the development of the WSSP.

As part of the development of the draft WSSP 2050, there has been pre-consultation engagement with these environmental authorities, which was undertaken as outlined in Chapter 2 of this report. On the commencement of the public consultation on the draft WSSP 2050 and associated environmental reports, an email announcement was issued to all statutory and regulatory stakeholders, including the environmental authorities as required by the SEA Regulations, on 21 June 2024.

Briefings were offered during the consultation period and hard copies of the documents were distributed to the environmental authorities on request. For a full list of the briefing dates with environmental authorities please see Appendix H.

4.10.2 Elected Representatives

Emails were issued to all elected representatives including Ministers, Teachtaí Dála (TDs), Senators, Members of the European Parliament (MEPs), and Councillors on 21 May 2024. The correspondence included details of the consultation and invited feedback on the draft WSSP 2050, NIS, and SEA Report, with the consultation questions set out. The correspondence also included links to the above documents, as well as the offer of a dedicated online briefing with the WSSP team and included details of an online booking form to arrange this. For a full list of the briefing dates with elected representatives please see Appendix H.

4.10.3 Local Authorities

To increase awareness and encourage participation in the draft WSSP 2050 consultation, Chief Executives and Directors of Services for Water / Environmental Services of all 31 local authorities were notified of the consultation by email on 21 May 2024. Correspondence included details of the draft WSSP 2050, an outline of the consultation and the consultation questions, and all necessary information on how to participate.

A hard copy of each of the consultation documents was provided to each of the 31 local authorities planning counters to provide council employees and members of the public alike the opportunity to view the documents in person.

4.10.4 Interested Bodies

Interested bodies were identified through a stakeholder mapping process from existing stakeholders that Uisce Éireann engage with regularly on plans and projects and stakeholder groups who may have a valid interest in the development of the WSSP 2050. This is to ensure that a wide range of stakeholder groups were made aware of the consultation and given the opportunity to engage and participate in the process.

An email was issued on 21 May 2024 to those identified, informing them of the details of the consultation and inviting them to give their feedback on the draft WSSP 2050 Plan and associated environmental reports. Interested bodies identified by Uisce Éireann were offered a briefing during the month of June 2024.

4.10.5 Uisce Éireann National Stakeholder Forum

Uisce Éireann hosts the Uisce Éireann National Stakeholder Forum quarterly, which has representations from the three pillars of sustainability: economic, social and the environment. Participants represent these sectors at a national level with effective two-way engagement occurring on specific themes.

On 28 June 2024, Uisce Éireann briefed the National Stakeholder Forum and gave an update of the public consultation on the draft WSSP 2050.

4.10.6 Public Webinars

Two public webinars were held over the months of May and June 2024 and 57 interested members of the public registered their attendance.

The public webinars were promoted through press releases, as well as to all elected representatives and on Uisce Éireann's social media channels.

Updates were made to the Uisce Éireann website and an email update was issued to all stakeholders on the WSSP mailing list. A presentation on the draft WSSP 2050 Plan was given at each webinar, followed by a Q&A session with the WSSP team. A pre-recorded webinar was updated to the website and available for those that could not attend a webinar.

Table 2 Stakeholder Briefings

Stakeholder Group	No. of briefings
Interested Bodies	2
Elected Representatives	1
Key Representatives and Environmental Authorities	2
Public Webinars	2

4.10.7 Outcomes of the Consultation

All feedback received during this public consultation process on the draft WSSP 2050 was reviewed by the WSSP team and all relevant feedback has been incorporated into the final WSSP 2050. A summary of the feedback received, our response to this feedback and any consequential changes made to the draft WSSP 2050 is detailed in Chapter 6 of this report.

The SEA Statement and AA Determination adopted by Uisce Éireann outline how environmental considerations have been integrated into the draft WSSP 2050 and how consultation influenced the development of the WSSP 2050.

5 Analysis of the Feedback

This section of the report outlines the approach taken to analysing the 110 submissions received during this consultation period on the draft WSSP 2050 and associated environmental reports.

5.1 Methodology

Each submission received via email and Feedback Form has been acknowledged but not responded to individually. Each submission was reviewed in its entirety by the WSSP team and summarised in this consultation report. The personal data of individuals who made submissions is not documented within this report and is being held in accordance with GDPR 2018. Submissions made by organisations or elected representatives have been attributed to the relevant organisation or person.

Following a review of the feedback received, the key comments from the submissions which emerged were identified to assist consideration and review, and are summarised under the following chapter headings as:

- Challenges
- Strategic Objective 1
- Strategic Objective 2
- Strategic Objective 3
- Strategic Objective 4
- Approaches to Meeting Long Term Challenges
- Implementation
- Strategic Environment Assessment
- Natura Impact Statement
- Out of Scope

The following chapters of this consultation report comprise a summary of all submissions received under each heading, followed by Uisce Éireann's response to the key points raised. Some feedback may be relevant under a number of chapter headings.

The views represent the views of those who made submissions as part of the public consultation process. The issues outlined in the feedback section are in the order in which they appear and there is no bias implied by the order in which they are addressed.

5.2 Out of Scope

There were several submissions received during the consultation that mentioned topics outside of the scope of the draft WSSP 2050. Although not directly related to this consultation, we have captured and summarised that feedback in Chapter 6.10 and have forwarded on any queries to the relevant teams in Uisce Éireann to respond.

Any feedback in relation to in-flight Uisce Éireann projects, or any other area of the Uisce Éireann business that does not relate to the draft WSSP 2050 was shared with the corresponding project teams, details of which can be found on www.water.ie.

5.3 Submission Overview

A total of 110 responses were received: 63 Feedback forms and 47 email submissions. The parties who returned submissions directly relating to the draft WSSP 2050, the SEA Environmental Report and the Natura Impact Statement for the draft WSSP are summarised in Table 3.

Table 3 Consultation Submissions

Submission Number	Stakeholder	Stakeholder Group
1	Councillor Jarlath Munelly	Councillor
2	Private Individual	Member of Public
3	Irish Peatland Conservation Council	Environmental Charity
4	Private Individual	Member of Public
5	Private Individual	Member of Public
6	Gleann a'Phuca	Interested Body
7	Cork Rivers Group	Interested Body
8	Dun Laoghaire Rathdown County Council	Local Authority
9	Councillor Michael Cahill	Councillor
10	Private Individual	Member of Public
11	Southern Regional Assembly	Local Government
12	Private Individual	Member of Public

Submission Number	Stakeholder	Stakeholder Group
13	Upper Leeson Street Area Residents' Association	Interested Body
14	The Irish Academy of Engineering	Interested Body
15	Department of Housing, Local Government and Heritage	Environmental Authority
16	An Fórum Uisce	Environmental Authority
17	Transport Infrastructure Ireland	State Agency
18	Private Individual	Member of Public
19	Irish Home Builder's Association and Construction Federation Ireland	Interested Body
20	Meath County Council	Local Authority
21	Gas Networks Ireland	Local Authority
22	Louth County Council	Local Authority
23	Galway City Council	Local Authority
24	ESB	Utility Company
25	Enterprise Ireland	Interested Body
26	Department of the Environment, Climate and Communications	Environmental Authority
27	Office of the Public Regulator	State Agency
28	Clare County Council	Local Authority
29	Gaia Ecotecture	Interested Body
30	Inland Waterways Association of Ireland	Environmental Charity
31	Northern and Western Regional Assembly	Local Government
32	Private Individual	Member of Public
33	Tipperary County Council	Local Authority

Submission Number	Stakeholder	Stakeholder Group
34	Department of Agriculture, Environment and Rural Affairs (NI)	Environmental Authority
35	Historic Environment Division	Environmental Authority
36	Inland Fisheries	Environmental Authority
37	Irish Business and Employers Confederation	Interested Body
38	The Tramore River Communities Group	Interested Body
39	An Taisce	Interested Body
40	Commission for Regulation of Utilities	Energy and water regulator
41	Bord Iascaigh Mhara	State Agency
42	Environmental Protection Agency	Environmental Authority
43	Councillor Thomas Breathnach	Councillor
44	Private Individual	Member of Public
45	Local Authority Water Programme	Environmental Authority
46	Sustainable Water Network	Environmental Authority
47	EirGrid	Utility Company
48-110	Feedback Form Submissions	

The following figure presents the results of the overall analysis of the 110 submissions. There were 101 references for Strategic Objective 1, followed by 86 for Strategic Objective 2.

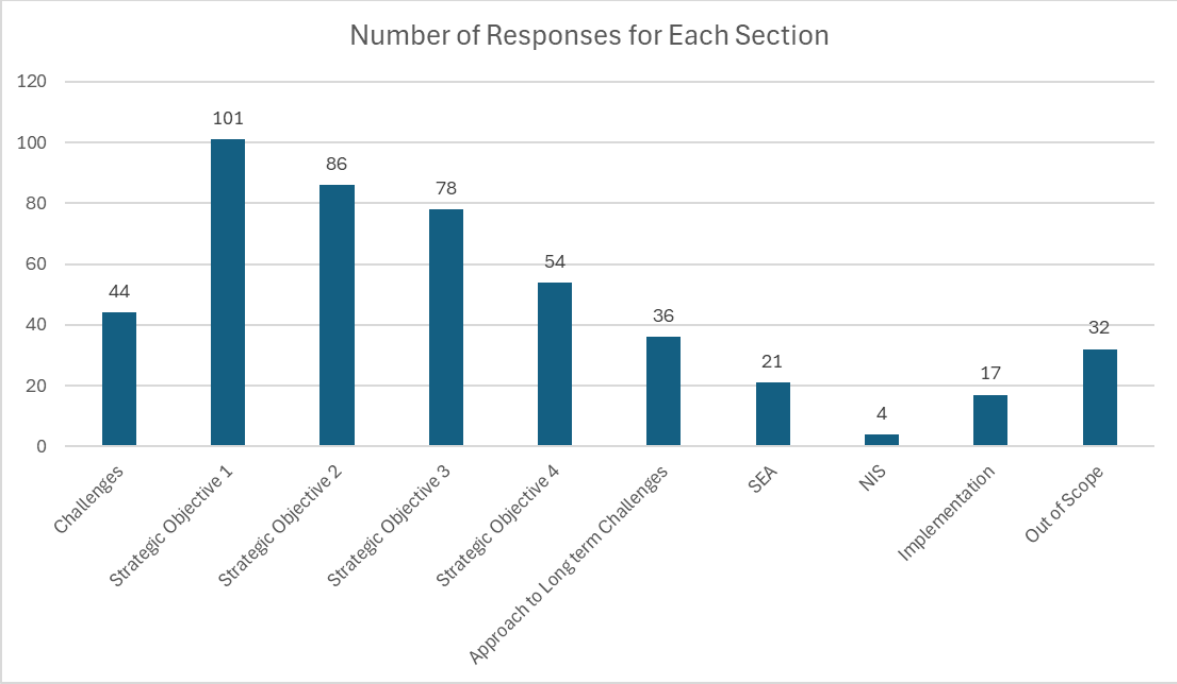


Figure 3 Number of Responses for Each Section

5.3.1 Feedback Form

Sixty-three (63) feedback forms were received as part of the consultation including 44 members of the public. Key findings include:

Seventy-eight percent (78%) of people found Safe and Reliable Drinking water the most important objective the WSSP must deliver. Followed by Supporting Customers, Communities and the Economy.

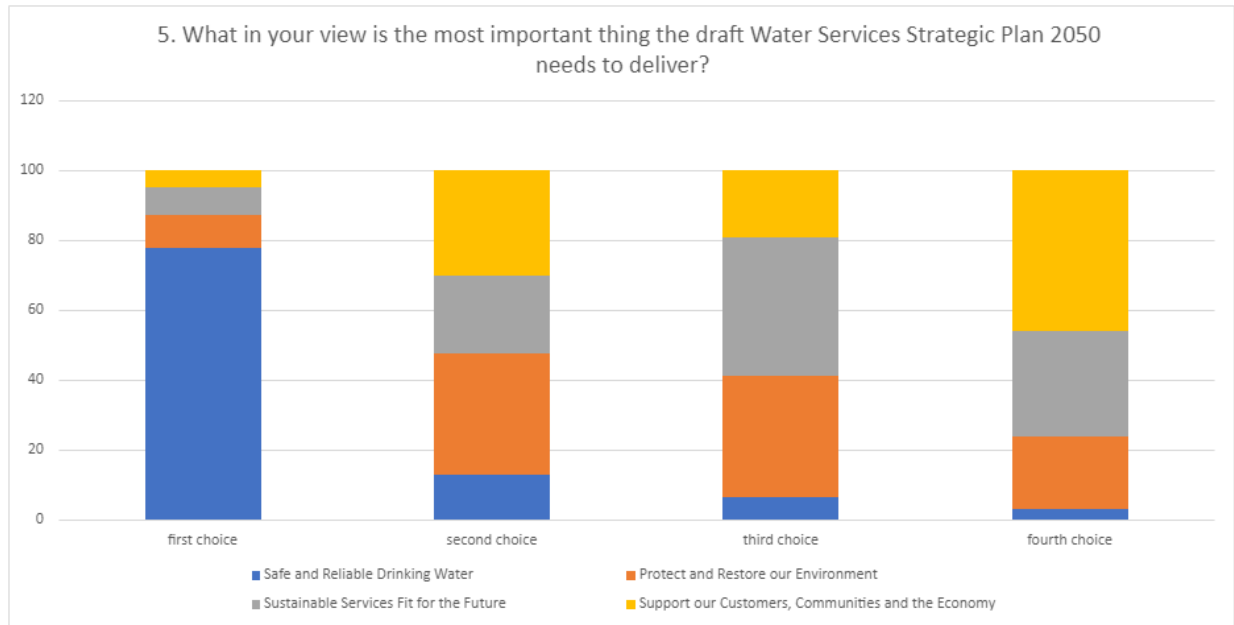


Figure 4 Feedback Form Question 5

Seventy-three percent (73%) of people strongly agreed that Ageing Infrastructure was the biggest challenge in delivering water services followed by Growing Population and Economy.

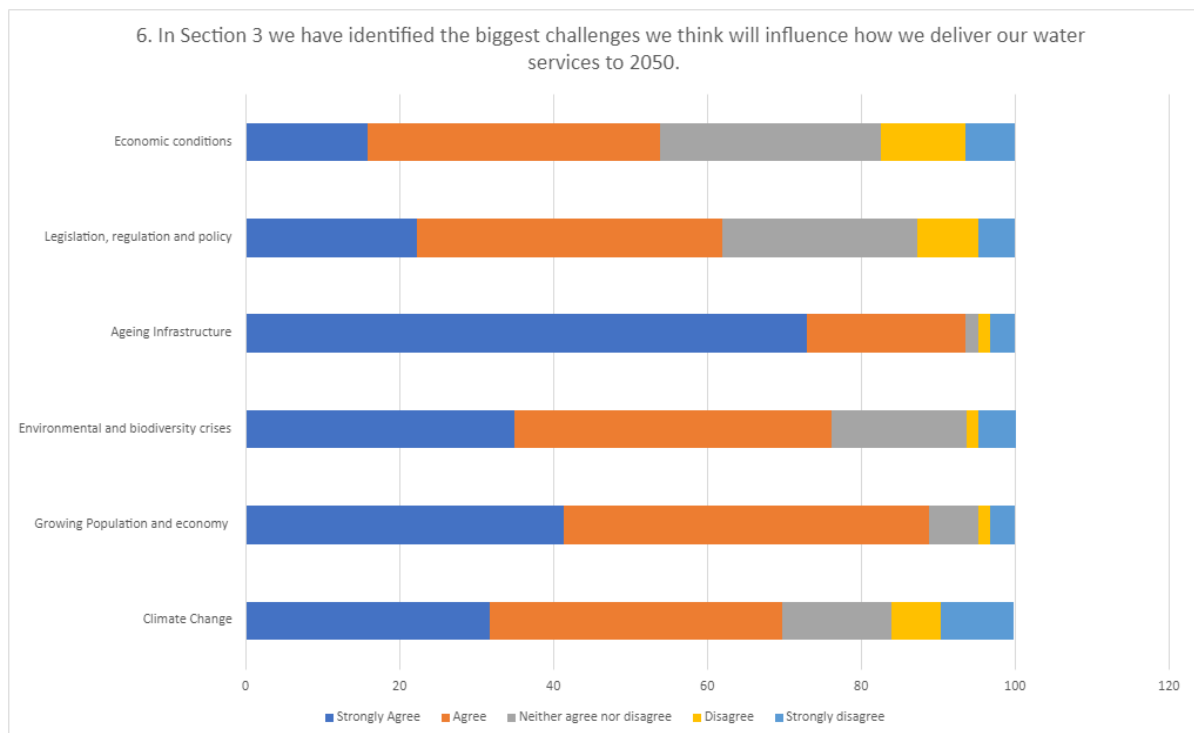


Figure 5 Feedback Form Question 6

5.4 Submission Process

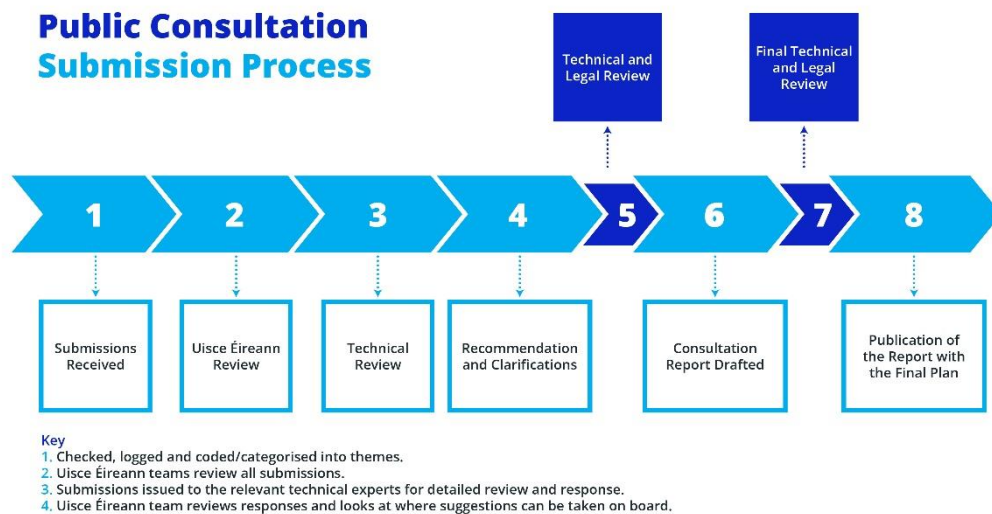


Figure 7 Public Consultation Submission Process

Our response is generally speaking on a broad basis. References to any consequential changes made to the draft WSSP 2050 Plan, any clarifications required, and any other actions considered appropriate, have been included in the “Conclusions” section at the end of each of the following chapters.

It is acknowledged that there is a degree of repetition in some of the responses. This is to allow a reader interested in just one topic to get a full picture of the response to it, without having to cross-reference the response given in other chapters.

6 Submission Analysis

6.1 Challenges

In this chapter, we summarise the key references in submissions to issues under Challenges. Within the overall heading of Challenges there were 44 references. We have further categorised references under the six key challenges as identified in the draft WSSP 2050. We deal with each of the key challenges in this chapter, setting out first a summary of the relevant references in the submissions, followed by our response.

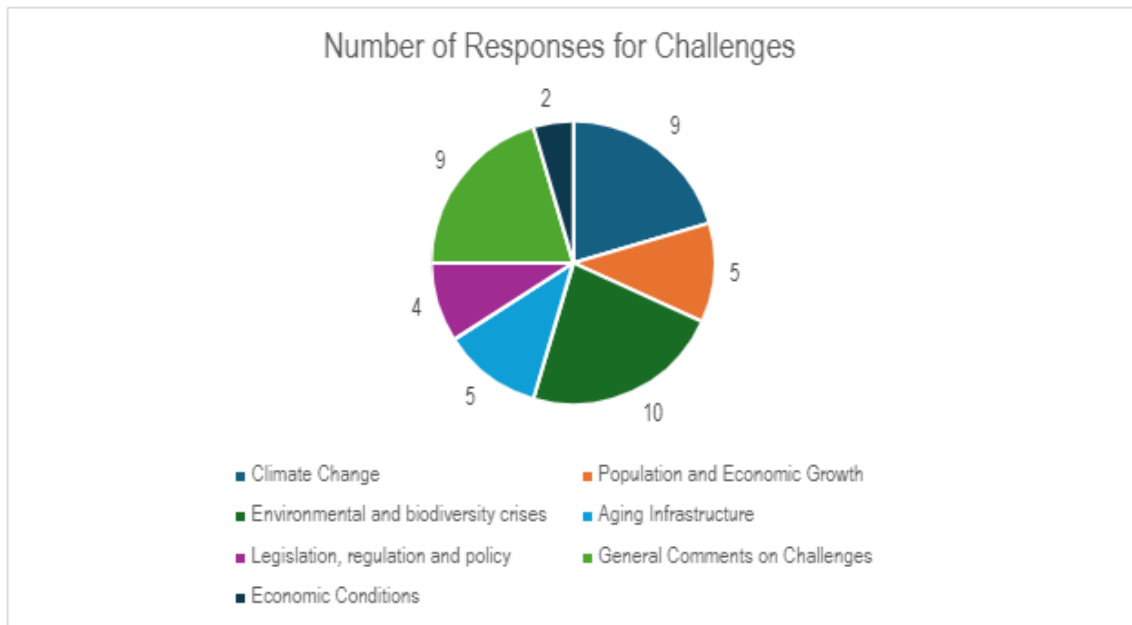


Figure 8 Number of Responses for Challenges.

6.1.2 Climate Change

Summary of Climate Change Feedback

Challenges of climate change, network resilience and security of supply

The CRU agreed “with the challenges identified in the draft WSSP 2050 in relation to the environment, climate change, network resilience and security of supply and welcomes the various actions set out in the WSSP to meet these objectives”.

Uisce Éireann welcomes CRU's submission and acknowledgement of the challenges we have addressed in our Water Services Strategic Plan 2050.

Climate Action Plan & National Adaption Framework

The Department of Environment, Climate and Communications (DECC) requested that the WSSP consider The Climate Action Plan 2024 (CAP24) to reach net- zero emissions by no later than 2050. DECC further requested The National Adaption Framework (NAF) is also considered when finalising the plan.

Uisce Éireann welcomes DECC statement and can confirm that the actions set out in The Climate Action Plan 2024 (CAP24) to reach net- zero emissions by no later than 2050 are being considered as part of our Net Zero Roadmap and sustainability framework. Uisce Éireann has considered the National Adaptation Framework in the development of the plan and it is included among the external policy documents in our implementation framework on page 69.

Energy & emissions

The Irish Academy of Engineering (IAE) highlighted that Uisce Éireann's demand for energy will inevitably increase in future considering economic growth and the impact of national and EU legislative requirements. The IAE suggested a greater reliance on renewable energy sources. They cited The Climate Action and Low Carbon Development (Amendment) Act 2021 which requires Ireland to achieve a 51% reduction in emissions by 2030, relative to 2018 levels, and net-zero emissions by 2050.

Inland Fisheries Ireland (IFI) referenced the Intergovernmental Panel on Climate Change (IPCC) Sixth Assessment Report (AR6) that warns that climate disruption is accelerating and that "immediate, rapid and large-scale reductions in greenhouse gases" are necessary. Inland Fisheries Ireland welcomed Uisce Éireann's commitment in the draft WSSP to take mitigating actions to reduce greenhouse gas (GHG) emissions.

Uisce Éireann welcomes IAE's and IFI's submissions. Energy efficiency improvement is a key sustainability measure to help ensure water and wastewater services are resilient to climate change and for developing a low greenhouse gas (GHG) emitting water and wastewater service. Uisce Éireann accounts for 21% of public sector electricity consumption and is by far the largest consumer of electricity in the public sector. We are therefore focused on improving energy efficiency in asset design, upgrades, lighting and heating, transport and process, as well as on renewables such as photovoltaic (PV), wind and biogas, and focusing on reducing demand (e.g., through water conservation), particularly in the context of the current energy crisis. We have made significant progress on our journey to become an energy efficient, low carbon, sustainable water utility. We have achieved improvements of over 30% in our energy efficiency. We are developing plans to move towards net zero carbon, including further development of renewable energy sources on our assets.

Water storage

Irish Home Builders Association (IHBA) and Construction Industry Federation (CIF) noted that climate change poses a major challenge to water services in Ireland and long-term planning should focus on utilising water storage systems to meet current and future population needs.

Uisce Éireann welcome the Home Builders Association and Construction Industry Federation comment related to water storage. Water Storage is considered in the National Water Resource Plan (NWRP) and the associated Regional Water Resource Plans (RWRPs) where we prioritise solutions that provide raw water sources with natural storage i.e., proposed abstractions from natural lakes/existing reservoirs and larger aquifers will score higher than proposed abstractions from rivers/small aquifers as these will be more resilient in climate change scenarios. The NWRP and RWRPs set out to provide a more interconnected system which obtains supply from resilient sources such as lakes, existing reservoirs and large aquifers ensuring customers have access to more than one source of supply providing higher levels of service to our customers in the event of an outage at one water treatment plan (WTP) or an issue with one source of supply.

Water quality consideration in climate change

Both An Foram Uisce (AFU) and the Sustainable Water Network (SWAN) recommended that the water quality aspects of climate change be further emphasised in the climate change challenge.

Uisce Éireann welcome and agree with AFU and SWAN statements and have included reference to the potential impact of climate change on water quality in the WSSP. We set out under Strategic Objective 3 the actions we will take to protect and restore the environment, including actions to ensure sustainable abstraction.

Assimilative capacity

Inland Fisheries Ireland (IFI) commented there “must be a re-evaluation of assimilative capacity for discharges, particularly in the context of climate change and the propensity for droughts of greater intensity and longer duration”.

Uisce Éireann welcome the comment by Inland Fisheries Ireland (IFI). Our Waste Water Discharge Authorisations (WWDA) undergo a re-evaluation of assimilative capacity during the periodic WWDA review process and this considers assimilative capacity based on latest available data for the receiving water body.

6.1.3 Population and Economic Growth

Summary of Population and Economic Growth Feedback

Growth and economy predictions

The Irish Academy of Engineering commented on the growth and economy predictions in the draft plan and highlighted that it will fluctuate due to global trends and events and “significantly influence our economic performance and the availability of funding for critical water services infrastructure”. Furthermore, IAE noted that if managed responsibly, surface waters and groundwater resources mean Ireland may not be as exposed to the impacts of climate change, projected economic and population growth and the decline in the quality of the aquatic environment.

Uisce Éireann welcome the comment by the Irish Academy of Engineering, providing for growth, adaptive planning and providing sustainable services fit for the future are key aspects of WSSP 2050.

Population fluctuations

The Southern Regional Assembly acknowledged the challenge of Ireland’s rapidly growing population and the necessity in providing new and upgraded infrastructure to support development to meet demand.

Uisce Éireann welcome The SRA comment, we have set out actions within our WSSP 2050 to address the challenge of population fluctuations.

Engagement with communities

Tipperary County Council (TCC) agreed with the key challenges, however, they further noted that “engagement with communities is a critical aspect in service delivery and the delivery of projects to mitigate and adapt to this challenge.”

Uisce Éireann welcome the comments by TCC and have set our commitment to enhance our engagement with communities under Objective 2.

Supporting growth

MCC recognised “the challenges facing Uisce Éireann in relation to the delivery of water and wastewater services.” They noted that as “Meath is within the Greater Dublin Area

(GDA), this creates both opportunities and challenges. While its proximity to the capital boosts the local economy, it has created a significant demand for housing."

Uisce Éireann welcome the statement by MCC and have committed to supporting growth, the economy and housing under objective 2.

6.1.4 Environment and Biodiversity Crises

Summary of Environment and Biodiversity Crises feedback

Community engagement

Inland Fisheries Ireland (IFI) stated that the Challenge of Environment and Biodiversity Crises is key for a number of actions identified in the WSSP. An Forum Uisce (AFU) supported the approach and solutions the WSSP 2050 detailed for the challenges facing water services to 2050, particularly in terms of nature-based solutions to restore and enhance water quality and improve climate resilience.

Several stakeholders including the Cork Rivers Group and Gleann A Phuca welcomed the outline of challenges for the draft WSSP 2050 plan but suggested a lack of awareness of water ecosystems both at the community and authority level as a key challenge to be considered. They further noted the complexity and the fragmentation of services and communication across Uisce Éireann, EPA, local authorities, and other relevant bodies as an issue.

Uisce Éireann welcome the comments by several stakeholders including the Cork Rivers Group and Gleann A Phuca. Uisce Éireann are committed to building on our current engagement and collaboration as set out in the WSSP. Uisce Éireann continues to engage within the RBMP three-tiered governance and implementation structure, the purpose of which is to ensure an integrated and cooperative approach to developing and implementing river basin management plans. The requirement in the Water Action Plan 2024 for the development of 46 No. Catchment Management Work Plans will further facilitate an integrated catchment management approach by bringing together Sectoral Action Work Plans from each sector at water body scale. A core function of LAWPRO is to work with community groups to support the work already being done to promote better water quality, and to encourage more groups to get involved. Community involvement is key to the protection and management of local water bodies. This is being achieved through a three-stage process:

- *Raising awareness of LAWPRO and engaging communities on local water quality issues and concerns.*

- *Supporting community involvement in the stewardship of local streams, rivers, lakes, and coasts.*
- *Building capacity within local communities through knowledge funding and training.*

LAWPRO is building networks of active communities with the knowledge, skills, and capacity to make a difference. In this way, LAWPRO's 13 Community Water Officers have established themselves as contact points for local communities. This is clear by the growing number of groups and champions getting involved in caring for their local water environment.

Increased public participation in the river basin management planning process will be achieved by the establishment of Catchment Community Fora during the lifetime of the third cycle. These Fora will build on the capacity within communities to identify and implement measures, with the objective of producing Community Action Plans. We work with LAWPRO bi-laterally and their engagement through the RBMP implementation structure. Further information on responsibilities for water management can be found in our response under the heading Responsibilities for Water Services and Water Management in Section 6.7 Implementation of this report.

Prioritisation of projects & nature-based solutions

An Taisce recommended that Uisce Éireann utilise EPA's update on pressures impacting on water quality report. They highlighted significant pressures and water bodies at risk from urban wastewater pressures. They also emphasised a need for balancing considerations between the EPA's Wastewater Remedial Action List and drinking water infrastructure upgrades and that any prioritisations in this respect should be open to public scrutiny. An Taisce highlighted the EPA's suggestion to prioritise investment in wastewater treatment systems at 89 priority areas and non-compliant treatment infrastructure. An Taisce suggested that Uisce Éireann champion nature-based solutions which combine water management with ecological restoration and protection. They further noted that these issues incur a significant financial cost for the Irish state which could be offset by a transition to nature-based solutions. and that nature-based solutions could help reduce pressures on urban wastewater collection systems,

Uisce Éireann welcome An Taisce's submission. Environmental compliance, including removing sites from the EPA Priority Action List, resolving issues where Uisce Éireann's assets are significant pressures on water bodies and progressively improving compliance with WWDAs, is prioritised in UE's capital investment planning process but will take several investment cycles to fully resolve. Our commitment to nature-based solutions is considered in both Action 1.3 and Action 3.8.

Designated shellfish waters

Bord Iascaigh Mhara (BIM) noted that Shellfish Water Protected Areas now come under the protected areas covered under the Water Framework Directive (WFD) and that the EPA

have directed that Uisce Éireann must complete an assessment of the impacts of wastewater discharges on 24 of the designated shellfish waters. BIM requested that Uisce Éireann complete an assessment of the impacts of wastewater discharges on 24 of the designated shellfish waters with a definitive timeline proposed. BIM noted that while WFD and River Basin Management Plan are cited, the protection of Shellfish Waters as laid out under the Shellfish Waters Directive (SWD) needs to be explicitly referenced in the plan. BIM acknowledged Uisce Éireann will be guided by the relevant authorities under a roadmap which has yet to progress the integration of the SWD within the WFD as a sub directive. However, they commented that “given the time span of this plan, we would expect that there would be some acknowledgement of intention to integrate the SWD into the WFD and that in the future it will be prioritised”.

Uisce Éireann welcome BIM' submission, we are committed to achieving WFD objectives including protection of shellfish waters, and we include our commitment to development of sustainable solutions which minimise our impacts on shellfish water under Action 3.5 managing our wastewater services. As per the methodology that was developed in consultation with the Regulator and the bodies specified in the Wastewater Discharge Authorisation, there are works being progressed under the Wastewater Disinfection Programme and where an urban wastewater source has been identified as the issue, and an appropriate solution identified, these are progressed through capital investment projects and programme. There are projects progressing which will improve water quality in Shellfish Waters captured under the PAL or priority water bodies (RBMP significant pressures) categories.

Compliance & sanctions

Ibec noted that the full implications of the Third Cycle River Basin Management Plan are not yet clear or the new sanctions which may be imposed on the State by the European Commission after 2027. This is also, they noted, the deadline set by the Water Framework Directive for achieving Good Status in rivers, lakes, and groundwater. There is similar uncertainty over any additional constraints on Uisce Éireann operations that may arise from the recently enacted EU Nature Restoration Law. Ibec suggested “it would be better for all stakeholders if these issues could be resolved through early dialogue rather than through lengthy, costly planning objections and legal challenges.”

Uisce Éireann welcome the comments by Ibec. Uisce Éireann are committed to building on our current engagement and collaboration as set out in the WSSP. Uisce Éireann continues to engage within the RBMP three-tiered governance and implementation structure, the purpose of which is to ensure an integrated and cooperative approach to developing and implementing river basin management plans. The requirement in the Water Action Plan 2024 for the development of 46 No. Catchment Management Work Plans will further facilitate an integrated catchment

management approach by bringing together Sectoral Action Work Plans from each sector at water body scale.

6.1.5 Ageing Infrastructure

Summary of Ageing Infrastructure Feedback

Infrastructure replacement

A Stakeholder commented that a priority for Uisce Éireann must be to replace old water main pipes while another stakeholder commented that “the networks are degrading faster than can be maintained at present rate of renewal”.

IAE commented that the current rate of replacement (watermains at an annual rate of 0.5% and sewers at 0.1%) is not adequate. IAE noted that most of the older parts of the networks are in urban centres with other adjacent services, and construction work will be highly disruptive. They further noted the impact on resource demands and future required investment is quantified and understood, by Uisce Éireann, the regulators and funders. IAE suggested that Uisce Éireann should separate funding for network replacement, Irish Home Builders Association and Construction Industry Federation commented “it is crucial to include the need for financial support for improvements and new infrastructure, with an ambitious growth approach.”

Uisce Éireann can confirm that Maintenance and replacement of sewers and water mains are a priority of Uisce Éireann and will always form a key part of our investment plans. We agree that ageing infrastructure, particularly ageing of our water and wastewater networks, is a huge challenge that we will have to face. It is a challenge that we share with water utilities across Europe and globally. The first step is to quantify the long-term investment needs and this is included within Action 4.9 of the WSSP. While increasing levels of investment will be required, we also know that this alone will not be sufficient to meet the scale of the challenge that we face. We will need to progress other actions as set out in the WSSP to address this long-term issue for example:

- *Water conservation and water efficiency so that we can reduce the level of investment needed to support growth.*
- *Using innovation to find new ways to more efficiently refurbish existing watermains with minimal disruption to the public.*

Actions in place to address the ageing infrastructure

Inland Fisheries Ireland noted the following Actions are of particular importance in relation to meeting the challenge of ageing infrastructure:

- Action 1.5 - Storage reservoirs
- Action 1.7 - Water conservation
- Action 2.6 - Sustainable development
- Action 3.2 – Integrated Urban Wastewater Management Plans
- Action 3.3 – Fish screening and water transfers
- Action 3.6 – Impoundments and barriers

Uisce Éireann acknowledge IFI's submission. These areas are considerations within our WSSP or Lower tier plans.

6.1.6 Legislation, Regulation and Policy

Summary of Legislation, Regulation, and Policy

Peatland & legal obligations

Irish Peatland Conservation Council (IPCC) highlighted that Ireland has legal obligations under National and European legislation to protect peatlands. IPCC requested that these legislative instruments are considered when developing the final WSSP 2050.

Uisce Éireann welcome the comment by the Irish Peatland Conservation Council (IPCC). The WSSP is subject to Strategic environmental assessment and Appropriate Assessment. This is a high-level strategic plan which identifies multiple Tier 2 plans. These Tier 2 plans will also be subject to SEA and AA, where appropriate. Projects will also be subject to all relevant environmental assessments. Relevant EU and national legislation are considered at each step, in addition to protection of the environment, including peatland.

Emerging EU Directives & national legislation

The Irish Academy of Engineering noted that new EU Directives and / or amendments to existing Directives are likely to result in changes to the standards for catchments, environmental protection, drinking water and urban wastewater and likely influence the required funding.

Uisce Éireann welcome the comment by The Irish Academy of Engineering. The WSSP has been developed considering new and emerging EU and national policy and legislation such as the NPF, the Abstraction Act and the proposed Urban Wastewater Treatment Directive.

Legislative uncertainty

The Irish Home Builders Association and Construction Industry Federation highlighted the challenge of delivering new infrastructure in the face of legislative uncertainty. They cited the forthcoming Planning and Development Bill and ongoing challenges to planning applications for the delivery of critical infrastructure projects. "Such projects are often delayed and should be given emergency powers to be delivered given their role in supporting development...to ensure that adequate critical water and wastewater infrastructure is being delivered."

Uisce Éireann welcome the comment by The Irish Home Builders Association and Construction Industry Federation. The draft WSSP 2050 outlines our strategic direction to deliver water services at a national level. We have aligned with the National Planning Framework (NPF), as appropriate, and considered updates during drafting. We would also welcome new policy and legislation to reduce the uncertainty around delivery of critical infrastructure.

Actions in place to meet the challenge of legislation, regulation and policy

Inland Fisheries Ireland noted the following are of particular importance in relation to the actions to meet the challenge of legislation, regulation, and policy:

- Action 3.1- Emerging Pollutants
- Action 3.3 – Drinking Water Treatment Plant Licensing, DWTP Risk Assessments, DWTP Management
- Action 3.4 – Water Framework Directive Objectives
- Action 3.5 - Wastewater Compliance
- Action 4.4 - Water Conservation

Uisce Éireann note IFI comment, these areas are considered in our WSSP actions or lower tier plans.

6.1.7 Economic Conditions

Summary of Economic Conditions Feedback

Meeting the challenge

Irish Home Builders Association and Construction Industry Federation commented that Uisce Éireann must consider ambitious changes, and adequate supports are in place to meet these Economic Challenges

Uisce Éireann note Irish Home Builders Association and Construction Industry Federation comments. Key enablers to delivery of our ambitious WSSP 2050 will be adaptive planning, systems thinking and collaboration.

Securing long-term funding

The Irish Academy of Engineering commented the key challenges are in the view of IAE understated in the draft Plan and that additional funding over what is currently provided will be required as Uisce Éireann will be competing with other sectors and utilities for funding and resources.

Uisce Éireann note the Irish Academy of Engineering comment, we acknowledge in WSSP 2050 the coming decades will bring enormous challenges for the delivery of water services. We have set out in our WSSP the strategic objectives and actions we will take to address these challenges including Action 4.9 Quantify and articulate long-term investment needs for our water and wastewater assets and Action 4.10 Secure multi-annual funding approach.

6.1.8 Conclusions on Challenges

Having carefully reviewed the submissions received on Challenges Uisce Éireann have considered the following clarification should be provided in the WSSP 2050.

Clarifications on Challenges Feedback

Section 2 – We have included a reference to water quality in the climate change section of the WSSP.

6.2 Strategic Objective 1: Safe and Reliable Drinking Water

In this chapter, we summarise the key references in submissions to issues under Strategic Objective 1. Within the overall heading of Strategic Objective 1 there were 101 references. We have further categorised references under the Actions as identified in the draft WSSP 2050. We deal with each of the Actions in this chapter, setting out first a summary of the relevant references in the submissions, followed by our response.

In our response survey, several stakeholders welcomed Strategic Objective 1 and noted it as “essential” and “important” with others noting for significant investment and community engagement is needed to support the Objective. Stakeholders including; Glean A Phuca, Cork Rivers Group, The Department of Housing Local Government and Heritage, CRU, Enterprise Ireland, The North West Regional Assembly and Tipperary County Council all welcomed the aims and actions under Strategic Objective 1.



Figure 9 Number of Responses for Strategic Objective 1

6.2.1 Action 1.1: Undertake risk assessments across our supplies and implement appropriate measures to manage risk

Summary of Action 1.1 Feedback

Risks from blue-green algae

An Taisce highlighted “the need to specifically consider the risks associated with blue-green algal blooms in drinking water sources. This is particularly pertinent given the prominent cyanobacterial blooms in both the Poulaphouca and Vartry reservoirs over the last year.” Furthermore, An Taisce noted “due to increasing temperatures and posing a risk in the production of THMs, the risk assessment should consider the implications of increased and more persistent blue-green algal blooms, future-proofing treatment solutions to manage the risks of increased THMs.”

In response to An Taisce source risk assessments are currently being developed under our Drinking Water Safety Plan that will address eutrophication, algal blooms and natural organic matter from peatlands with the potential to contribute to THM formation.

Risk of planning & regulations

A stakeholder requested under Action 1. how risk assessment will address issues at the level of planning and building regulations (which are mentioned under objective 2), stated that “securing safe water systems should be a key priority at planning stage and thus clear engagement is needed from Uisce Éireann with developers as well as enforcement of planning regulations both prospectively and retrospectively.

The drinking water safety plans risk assessments, and address quality of water rather than availability of water. It is a requirement for developers to engage with Uisce Éireann for new connections, to ensure that there is capacity available for development. Uisce Éireann is also promoting water efficiency to be included in building regulations. In addition to promoting water efficiency to be included in Building Regulations, we have promoted the use of the Irish Green Building Council (IGBC) Home Performance Index (Water Module) in our CDS Code of Practice (Martin McGrath). We also sit on the NSAI Technical Committee responsible for the SR50-3 Plumbing Standard. We also engaged with the Land Development Agency (LDA) on their Sustainability Strategy which includes commitments to reduced water usage in their properties. Uisce Éireann does not have a role in enforcement of planning legislation and in drafting Building Regulations.

Taking in Charge

Tipperary County Council requested that the Water Services Strategic Plan outlines a programme to take charge of schemes which are connected to Uisce Éireann infrastructure to facilitate proper and appropriate oversight and accordance with public health standards. The measures broadly align with the Council Climate Action Plan, and they requested that the Plan would commit to Uisce Éireann engaging with the Environment and Climate Action Section of Tipperary County Council to explore the delivery of their actions relating to Climate Action. TCC requested particular engagement relating to nature-based solutions, catchment management and bioeconomy.

Taking-in-charge of Public Infrastructure is a function of Planning Authorities under Planning and Development legislation. Uisce Éireann is a consultee in relation to the water and wastewater infrastructure elements of taking-in-charge applications being processed by any Planning Authority. Formal processes were established in 2016 to enable this, and these processes continue to work well. Uisce Éireann welcomes a number of stakeholders requests for engagement and collaboration on objectives, strategic aims and action, including Tipperary County Council's request for engagement and collaboration on climate change action, nature-based solutions, catchment management and bioeconomy.

Remedial Action List

EPA stated Uisce Éireann needs to resolve the “at risk” supplies on the EPA’s Remedial Action List (RAL) initially and then implement the findings of their DWSP and reflected in the WSSP. “By implementing findings in a proactive way, the resilience of supplies will be improved.” The EPA further noted that the WSSP should also detail how the implementation of the DWSP will resolve supplies on the EPA’s RAL initially and then move to a more proactive approach to improve drinking water supply resilience.

Uisce Éireann are committed to prioritising resolution of the “at risk” supplies on the EPA’s Remedial Action List (RAL) and implementing the findings of the DWSP. Uisce Éireann continues to make progress in addressing known risks to water supplies which are on the EPA’s Remedial Action List. In 2023, 10 more supplies were removed from the list following the completion of remedial actions. For those supplies that remain on the list or for those added, Uisce Éireann is progressing plans to address any underlying issues and ensure resilient water supplies for the communities they serve”.

As requested by the EPA, we will include text under action 1 of the WSSP highlighting how the implementation of the DWSP will resolve supplies on the EPA’s RAL initially and then move to a more proactive approach to improve drinking water supply resilience.

THMs

Councillor Michael Cahill outlined that the Environmental Protection Agency has included six Kerry drinking water supplies on its Remedial Action List, with high levels of THMs. Councillor Cahill is looking for assurances that levels are being closely monitored and treated in Kerry. This report lists Cahersiveen, Caragh Lake, Mid Kerry/Gearha, Kilgarvan, Lyracrompane and Listowel Regional Public Water Supply as being of concern but noted all drinking water should be regularly tested for harmful bodies and remedial action must be taken urgently where required.

Monitoring requirements including for THM's are set out in the drinking water regulations. Uisce Éireann continues to prioritise the elimination of trihalomethanes from public water supplies through a proactive campaign of targeting, testing and remediating any supplies at risk. The vast majority of public water schemes identified in the recent judgement of the European Court Of Justice in relation to THM exceedances have now been addressed, with just 5 of the original 74 schemes remaining. And projects are underway at all five locations to address the issues either through upgrades or rationalisation of existing treatment plants. Uisce Éireann's enhanced testing and monitoring programme across its 700-plus public water supplies ve also enabled the utility to identify a number of additional sites where THM risks exist. There are currently 25 schemes on the EPA's Remedial Action list for THMs. In all these cases we are taking concerted action to remove these risks through a combination of plant upgrades and enhanced operational controls.

Contaminants of emerging concern

LAWPRO offered to provide additional support to Uisce Éireann in the area of collaboration to prevent the risk posed by emerging pollutants of concern. CRU welcomed plans to monitor raw water supplies for Contaminants of Emerging Concern (CECs) which they noted are beyond the level of compliance currently required. They further suggested considering the potential benefit of monitoring CECs in wastewater influent, as discharge containing CECs would be a source of pollution to water supplies.

Uisce Éireann welcomes collaboration with LAWPRO with respect to prevention of risk from emerging pollutants. The recast UWWTD sets out the requirements to monitor and treat micropollutants in wastewater including for any that may be a risk to drinking water supplies. Our commitments to compliance with the recast Urban Wastewater Treatment Directive which will includes requirements for micropollutants are set out in action 3.5

Abstraction licensing & guidance

LAWPRO welcomed the introduction of the DWSP, and stated the dataset containing risk assessment and management information to be provided by EPA by July 2027 should acknowledge the new projected abstraction rates set out in the national strategy for consolidating water supplies. LAWPRO recommended that future licensing and guidance around assessment of abstraction as a pressure should extend to cover impacts to downstream and upstream.

In terms of future abstraction licensing and associated guidance we note that the Water Environment (Abstractions and Associated Impoundments) Act, 2022 (the Abstraction Act) has recently commenced and associated regulations have been published. This legislative regime will be regulated primarily by the EPA, and we await the publication of guidance to inform our approach.

Reliable water supplies

CRU agreed that safe and reliable water supplies are essential, and that water conservation and leakage reduction should be contained in WSSP 2050. They highlighted that targeted communication plans and engagement with relevant stakeholders; especially customers, is required. "It is important that Uisce Éireann maintain and enhance its own compliance frameworks to ensure requirements under legislation are met, and that these are developed and implemented alongside stakeholder engagement to the required standards and timeframes."

Uisce Éireann welcomes CRUs agreement that safe and reliable water supplies are essential, and that water conservation and leakage reduction are crucial elements that should be contained in WSSP 2050. We also agree that targeted communication plans and engagement with relevant stakeholders; especially customers, is required. Further details on communication and engagement is set out under Strategic Objective 3: Conserving our precious resources and Strategic Objective 2: Support our customers, communities and the economy. In general, Uisce Éireann is moving towards integrated frameworks and systems following the ISO Management Systems approach. These internationally recognized approaches include factors such as stakeholder engagement (context of the organization), identification and compliance with relevant legislation, assurance and prioritization on a risk & opportunity basis. Alignment with the ISO 55001 standard for Asset Management is already one of the WSSP Actions.

Definitions & responsibilities

A submission from the Cork Rivers Group asked for a clearer definition of water to frame the context of the plan and would encourage Uisce Éireann to consider other important challenges, namely, “the lack of awareness and understanding of water eco-systems both at the community and authority level, and the complexity and fragmentation of services and communication across Irish Water, EPA, local authorities, and other relevant bodies.” They also recommended the draft demonstrates commitment to a “holistic and integrated approach to safe water.

Uisce Éireann have included definitions in our glossary. The River Basin Management Plan for Ireland 2018 – 2021 introduced reformed governance structures and arrangements for implementation of the plan. This structure formally sets out arrangements for an integrated and co-operative working relationships between the relevant public bodies. This structure fosters a collaborative approach and facilitates knowledge transfer between different levels of oversight and decision making. The structure is illustrated below. This is discussed in more detail in our response under heading responsibilities in Section 9 Implementation. Our drinking water safety plan approach is an integrated and holistic approach to safe water.

6.2.2 Action 1.2: Conform with the Drinking Water Directive and other legislative requirements relating to drinking water quality.

Summary of Action 1.2 Feedback

Communication with affected stakeholders

Tipperary County Council requested that the Strategic Aims recognise the requirement to engage directly with affected stakeholders, such as the Council’s citizens and communities, and that ‘community gain’ projects would be developed over the operational lifetime of the project and joint working groups initiated. “Communication is critical for successful delivery.” Uisce Éireann sets out the actions we will take to engage and communicate with affected stakeholders under Strategic objective 2 Support Customers, Communities and the Environment. We agree that communication is critical for successful project delivery, and we aim to make our engagement with stakeholders:

- Transparent
- Accessible
- Accountable
- Proportionate
- Meaningful

Emerging pollutants

TCC requested that the Plan outlines how emerging pollutants will be addressed,

With regards to how emerging pollutants will be addressed, the requirements regarding monitoring micropollutants in drinking water are set out in the European Union (Drinking Water) Regulations, 2023. Our approach to compliance with the drinking water regulations including contaminants of emerging concern is set out in Action 1.2 Conform with the drinking water directive and other legislative requirements.

Abstraction rates & pressures

TCC requested that the Plan outlines how data is collected and disseminated with new projected abstraction rates and abstraction pressure assessments;

In relation to the query on abstraction rates and abstraction pressure, this level of detail is not proposed in the plan. The Abstraction Act has recently commenced, and it will require a licence application for all existing and future abstractions that are above a certain threshold. The EPA can also direct abstractors of certain below threshold abstractions to apply for a licence. The NWRP has undertaken a desktop analysis of what the impact this regulatory regime will have on existing abstractions, and this information can be obtained from the RWRP reports available to download from our website, but this is a high-level conservative estimate and the full impact on abstractions will not be known until such time as licence applications are made and determined by the EPA. This information will be fed back into future iterations of the NWRP.

Drinking water quality

Ibec commented that they believe there is a perception that drinking water does not meet quality and safety standards due to publicity surrounding residual boil water notices in certain areas of the country.

Uisce Éireann acknowledge Ibec's statement that residual boil water notices can impact public perception on the quality of drinking water. Uisce Éireann operates over 700 water treatment plants across Ireland and we are committed to delivering transformative water services which enable communities to thrive." Over 99.7% of Ireland's drinking water supplies were fully compliant with the drinking water standards in 2023 "The EPA report recognises the ongoing improvements made by Uisce Éireann in testing, monitoring and assessing water supplies and the key role this has played in identifying risks to drinking water quality and ensuring a safer water supply for all. Where appropriate, temporary Boil Water Notices or other restrictions are

introduced to protect public health while the problems identified are addressed.” Most of the Boil Water Notices imposed in 2023 were in place for less than 30 days.

Catchment management to address risk

Ibec commented that Uisce Éireann’s approach to risk reduction should firstly reduce the level of suspended organic solids by collaborating with stakeholders on improved catchment management. Secondly Uisce Éireann should look at alternative means of disinfection. IBEC noted that Uisce Éireann is trialling the use of Monochloramine, which is known to be effective in reducing the level of THM byproducts. They further noted that any routine application of this technology would require the Uisce Éireann to ensure that adequate telemetry is in place and would also need to conduct effective community engagement.

In response to Ibec’s comment on Uisce Éireann’s risk assessment approach, Uisce Éireann affirms its commitment to a multi-faceted strategy for risk reduction as outlined in our Draft WSSP 2050. Action 1.1 of the plan details our Drinking Water Safety Plan approach that encompasses comprehensive risk assessments and risk management interventions spanning the entire water supply process, from catchment source to consumer taps. This will address potential risks at catchment level, throughout the treatment process, and within the distribution system. Additionally, Action 1.3 prioritises source protection through the integration of catchment management and nature-based solutions. The action outlines that collaboration with public agencies and catchment stakeholders is key to applying effective solutions that mitigate risks at their source. The use of Monochloramine is not being trialed by Uisce Éireann, but rather used as a site-specific temporary solution, it is not part of the disinfection strategy going forward.

Lead

Ibec suggested greater emphasis needs to be given to removing lead in the pipework from the distribution network. TCC requested the WSSP outline plans to accelerate the removal of public-sided lead connections. Some stakeholders noted concerns with the resilience and quality of the current water infrastructure with one submission in particular requesting that “lead pipes and fittings should be completely eliminated and or people should be informed if they are in a risk area especially pregnant woman”.

As per Action 1.2 “we will continue to evaluate and address risks related to lead in the distribution system.” There are public health risks from consumption of lead in drinking water. Limits on lead content in drinking water only began to apply in 1998. The EU Drinking Water

Directive, following World Health Organisation (WHO) advice, proposed a staged reduction in lead limits for drinking water from a previous standard of 50µg/l (parts per billion) to an interim level of 25 µg/l. This limit applied until 25th December 2013, when it was further reduced to 10 µg/l. The WHO advice is that the ultimate goal should be removal of all lead piping likely to supply water for drinking. There are no lead water mains in Ireland but there are still some lead service pipes remaining in the public network. We are replacing all remaining lead service pipes in the public water network with plastic pipes. These are made of polyethylene. This work is part of Uisce Éireann's Leakage Reduction Programme which is included in our capital investment plans. Responsibility for the internal plumbing homes and the connecting pipe from the outer edge of the property boundary is the homeowners. Further information can be found at on the Uisce Éireann website ¹.

The HSE has also developed a frequently asked question section regarding lead in drinking water².

6.2.3 Action 1.3: Coordinate catchment management measures and champion nature-based solutions for improving source water quality

Summary of Action 1.3 Feedback

Integrated catchment management

An Fórum Uisce recommended more emphasis is placed on integrated catchment management, placing a need for engagement and collaboration for source protection in all catchments, which is essential to reduce the need for treatment and end pipe solutions. AFU suggested that Action 1.3 be changed to “coordinate integrated catchment management measures in all catchments and champion community lead and other nature-based solutions for improving source water”. An Taisce welcomed the acknowledgement of the need for catchment-based measures but highlighted the key word “integrated” was missing. They stated, “it is critical that integrated catchment management is undertaken”. An Taisce called for Uisce Éireann to work closely with other stakeholders to implement integrated catchment management in all catchments, not just trialing certain measures in test catchment. SWAN welcomed a dedicated action in relation to catchment management measures. SWAN believed more emphasis should be placed on “integrated catchment management at the full catchment scale, including examining land uses and engaging with landowners to incentivise practices that minimise pollution” and the need for end-of-pipe solutions. This approach, SWAN suggested, should focus on nutrient run-off and THMs as

¹ <https://www.water.ie/help/water-quality/lead-in-drinking-water>

² <https://www.hse.ie/eng/health/hl/water/drinkingwater/lead/>

well as pesticides. SWAN supported the AFU's recommendation that this approach should "take place in all catchments and much include engagement and collaboration with stakeholders", going beyond expansion of pilot projects.

Uisce Éireann welcomes An Forum Uisce, An Taisce and SWANs recommendations to put further emphasis on Integrated catchment management and will change Action 1.3 heading to "Coordinate Integrated catchment management measures and champion nature-based solutions for improving source water quality" It is intended that through our DWSP approach we will assess catchment risks to raw water quality, so that we can identify and prioritise measures to protect the source in all drinking water catchments. We also progress pilot projects to trial new initiatives before they get rolled out more broadly. Uisce Éireann will change the title of Action 1.3 to include reference to integrated catchment management, we also will change the title of Action 3.8 (under strategic objective 3). We are committed to working closely with other stakeholders to implement integrated catchment management in all drinking water catchments. Uisce Éireann are committed to playing its part in relation to this. Indeed, we must work with other stakeholders as it is not within UE's remit to manage or implement all catchment management measures, as some will be outside of UE's remit. This is recognised in the Drinking Water Regulations, where there is a definition of "Source Protection Agencies" with responsibilities allocated to each. Through the DWSP approach we will assess the risk of all potential sources of contamination within the drinking water catchment and are currently developing source risk assessments for nutrients and natural organic matter from peatlands with the potential to contribute to THM formation.

Source protection

Inland Fisheries Ireland welcomed the action and supported the statement that source protection is preferable to end-of-pipe solutions. They commented that initiatives supporting this have the potential to "benefit water quality, aquatic habitats and aquatic biodiversity more generally."

Uisce Éireann welcomes Inland Fisheries Ireland support of the statement that source protection is preferable to end-of-pipe solutions. To highlight the "benefit water quality, aquatic habitats and aquatic biodiversity more generally" we have updated the WSSP text as follows: In adhering to the principle of "control the source in preference to end-of-pipe solutions," our proactive approach not only aligns with regulatory directives but also underscores our commitment to sustainable, nature-based solutions that secure the quality and integrity of the drinking water we provide to our communities and provides added benefits for general water quality, aquatic habitats and aquatic biodiversity.

Risk of windfarms to drinking water sources

A stakeholder raised the issue of pollution of water during the construction and operational phase of wind farm developments.

The regulation of the construction and operation of wind farms is outside of Uisce Éireann's remit. However, as a statutory consultee we do have an opportunity to provide feedback to the local authority for consideration in the planning application. Action 1.4: Implement and continue to review our NWRP, delivering improvements in water supply infrastructure to ensure resilient supplies into the future.

6.2.4 Action 1.4: Implement and continue to review our NWRP, delivering improvements in water supply infrastructure to ensure resilient supplies into the future

Summary of Action 1.4 Feedback

Sustainable / Reliable water supplies

An Fórum Uisce supported the need for having robust water supply infrastructure and resilient future water supply. The Forum recommended “development and planning for interconnected supplies and new sustainable water sources is given priority, particularly for water supplies in the Eastern and Midlands Region where there is currently limited capacity and resilience.” The Forum also recommended that all source water bodies are protected from over-abstraction to be sustainable. Inland Fisheries Ireland requested that for all abstractions, baseflows in surface waters are maintained and that sufficient headroom is provided to accommodate projected drought periods occurring as a result of climate change while protecting the ecological health of surface water systems.” IAE consider that Uisce Éireann abstracts water from many sources that are unsustainable. They consider that sustainable alternatives are required and generally source must be adequate for existing and future needs. Clare County Council advised that scrutinise any proposals for the abstraction of water from Lough Derg and the River Shannon for use outside the county and all abstraction proposals that may impact the proposed South Clare/University of Limerick Economic Strategy Development Zone, an objective involving the reopening of the Errina Canal.

The objective of the NWRP is to move to a more interconnected water supply based on sustainable water sources. As part of the NWRP Uisce Éireann has completed a desk top risk assessment of our abstractions. Supply Smarter is the third pillar of the NWRP and includes an assessment of various solutions, such as, the sustainable use of groundwater and surface water sources, interconnectivity, conjunctive use, impoundments, water treatment plant upgrades and technologies such as desalination and treated water re-use. Site-by-site assessments will be required as part of the new abstraction licencing regime. Through the licensing process Uisce Éireann will gain full insight into the regulatory requirements and sustainability of our current water sources. A key objective of the NWRP is to improve the sustainability of the national water supply from its current baseline. The scale of investment to transform our water supplies will be considerable. In determining further water needs we have provided an allowance for peaking in demand during dry summer periods and we have considered the impact of climate change. All feasible options considered as part of the RWRPs were assessed to ensure the required supply could be obtained from the proposed sources sustainably. This process ensures that all future abstractions will be sustainable.

Plan-led development

Irish Home Builders' Association and Construction Industry Federation recommended that Action 1.4, "Implement and review our NWRP," should include plan-led development and infrastructure delivery targets., They state that Government support and prioritisation are essential to overcome delays and that Infrastructure investment should be prioritised to support population growth and housing needs.

Uisce Éireann note Irish Home Builders' Association and Construction Industry Federation submission. We follow a plan-led growth approach through engagement with planning authorities in the development of statutory plans such as Regional Spatial Economic Strategies, City and County Development Plans and Local Area Plans. Our participation in the statutory planning processes through consultation on county, regional and strategic plans, allows us to determine key areas for investment in the medium to long term to support the delivery of new homes and economic growth. The draft WSSP 2050 outlines our strategic direction to deliver water services at a national level. We have aligned with the National Planning Framework (NPF), as appropriate, and considered updates during drafting. The NPF and Regional plan and local level plans also inform our tier 2 or tier 3 implementation plans, such as the National Water Resources Plan. Our supporting processes include engagement with the Department of Housing, Local Government and Heritage regarding capacity for new housing developments. Our Strategic Aim on "Providing for growth" is supported by Action 2.6 to "Engage and collaborate with key stakeholders to support national, regional and local planning policy."

Water demand

The CRU agreed that there is a need for a long-term strategy which includes actions to “improve the resilience of the water supply and increase the current levels of service by implementing long-term projects that are designed to meet growth forecasts across these areas.” The CRU highlighted the importance of putting in place robust governance, planning, scoping, and monitoring of capital projects so that they are efficiently procured and delivered on time to specification and that proactive and constructive engagement with relevant stakeholders will be required.

Uisce Éireann welcomes CRUs submission. The scale of investment to transform our water supplies will be considerable. However, the outcome in terms of ability to protect the environment, provide a good Level of Service for all customers, support growth and economic development, and adapt to climate change impacts will be substantial. The development and implementation of the NWRP will enable us to understand the scale of strategic investment required across our supplies, and to propose the appropriate level of investment needed to meet population growth as set out in the National Planning Framework. The Preferred Approaches identified through this process will be prioritised on a national basis and progressed through Uisce Éireann Capital Investment Plans. Details of our governance processes are included in RC4 which will be submitted to the CRU in 2024.

Strategic water supply projects

Clare County Council noted their commitment to supporting the work of Uisce Éireann and other relevant stakeholders in addressing the impact of climate change on public drinking sources. The Council supported the investment in strategic water supply projects and leakage reduction programmes through the National Water Resources Plan and the Eastern and Midland Regional Water Resources Plan subject to appropriate environmental assessment and planning process.

Uisce Éireann welcomes Clare County council's support and commitments highlighted in their response under Strategic Objective 1. The NWRP provided preferred approaches for all WRZs and to meet population growth and economic across all water supplies. A key objective of the NWRP is to improve the sustainability of the national water supply from its current baseline. All feasible options considered as part of the RWRPs were subject to assessment to ensure the required supply could be obtained from the proposed sources sustainably. This process ensures that all future abstractions will be sustainable.

Hydrogen production

ESB highlighted the “opportunities to explore alternative water sources that can potentially meet the water demands of hydrogen production and industrial cooling and avoid placing strain on valuable potable water supplies.” ESB acknowledged that ESB and Uisce Éireann are jointly exploring a project to assess the feasibility and viability of reusing wastewater for future industrial and decarbonisation uses such as hydrogen production.” Gas Networks Ireland recommended Uisce Éireann incorporate planning for green hydrogen production in their Strategic Plan. They noted the importance of planning for this additional demand cannot be underestimated as demand for water grows, and climate change impacts on water availability. GNI noted that in The National Hydrogen Strategy it states that “it will be important to engage with Uisce Éireann as the sector develops to ensure any potential future water needs for the hydrogen sector are understood and that sufficient infrastructure investment in the water network can be made in advance so that no localised supply issues emerge.”

Uisce Éireann are committed to building on our current engagement and collaboration with ESB and GNI to ensure we work together on a more sustainable Ireland. We will need and intend to collaborate with stakeholders to determine Uisce Éireann's role in the national hydrogen strategy. The aim of the Hy Water Uisce Éireann | ESB collaboration is one initiative that will progress our understanding of some of the technical, economic and regulatory challenges and opportunities to inform our decisions and role.

Replacement of water mains and sewage pipes

One stakeholder requested “Replace not just fix the Antiquity Supply Water Main Pipe and Wastewater Pipes.” Some stakeholders noted concerns with the resilience and quality of the current water infrastructure with.” A stakeholder commented that replacing or repairing infrastructure would make infrastructure more resilient.

Our Capital investment plans include a significant component which is capital maintenance which includes refurbishment and replacement of assets. We have numerous projects and programmes to replace ageing infrastructure such as watermains and sewers. For example, as part of our National Leakage Reduction Programme we are replacing pipes across the country to provide a more secure, reliable and sustainable water supply. We are replacing all remaining lead pipes in the public water network with plastic pipes. The purpose of the projects and programmes is to maintain the base service level of the network assets through implementation of planned capital maintenance. Base maintenance is the replacement and/or refurbishment of assets so that the original service capacity is re-established.

Interim measures

Other submissions commented that long-term decisions are welcomed but too slow and that critical issues need to be dealt with quicker.

Uisce Éireann acknowledge that due to the current condition of our supplies, it will take many capital investment cycles to deliver the long-term solutions across all supplies. To ensure we can support growth while transforming our supplies, we also develop interim measures which can be implemented in the short term. Interim measures will be progressed to support growth as part of our current regulated investment cycle. However, it should be noted that such measures generally do not improve Levels of Service, they prevent current levels from deteriorating further.

Climate benefits of water conservation

The Eastern and Midland Regional Assembly noted the climate benefits of water conservation, which include “reducing operational energy use and by reducing infrastructural requirements.”

Uisce Éireann welcome the Eastern and Midland Regional Assembly submission; the climate benefit of water conservation is considered in our water conservation strategy and national water resource plan.

Water conservation & leakage reduction

The Irish Academy of Engineering noted the importance of water conservation and leakage reduction in Uisce Éireann’s strategy to sustainably manage our precious water resources. Leakage reduction and water conservation are key pillars of the National Water Resource Plan.

Targeted water mains replacement is a core element of our National Leakage Reduction Programme and is set out in section 7.3.1 of the Framework Plan. As stated in our draft Framework Plan, sustained leakage reduction involves first establishing the data and information to allow us to understand our networks (a process which is ongoing) and then implementing a range of interventions, including:

- *Effective management of excess pressure and pressure transients*
- *Speed and quality of repairs*
- *Active Leakage Control (ALC)*
- *District Metered Area (DMA) optimisation*

- *Asset renewal, including: - Valves and controls - Targeted mains replacement - Service connections*

The above represents industry best practice and aligns with EU Reference Document “Good Practices on Leakage Management” (WFD CIS WG PoM).

6.2.5 Action 1.5: Develop contingency plans to improve reliability of our water supplies.

Summary of Action 1.5 Feedback

Addressing uncertainties

Irish Home Builders and Construction Industry Federation recommended that Action 1.5 should also “address unknown events (e.g., conflicts, inward migration) that put pressure on water supplies and be ambitious enough to cater to “worst case” scenarios.”

Uisce Éireann note Irish Home Builders and Construction Industry Federation submission. We do allow for uncertainties in demand when we plan for the future. For example, the SDB is used to inform the future demand that we should provide supply for and we apply a percentage allowance for uncertainties such as increase population growth which allows for these “worst case” situations. The objective of the Preferred Approach for the RWPR-SE is to provide the 1 in 50 level of service in a dry year, which is defined by the Dry Year Critical Period (DYCP). Therefore, we are proposing to move away from vulnerable sources which we struggle to maintain supply from to more resilient sources of supplies which will be less vulnerable to dry weather events. This will reduce the impact on customers during times of drought and periods of dry weather.

Location of infrastructure

Inland Fisheries Ireland stated that storage reservoirs and associated infrastructure should be offline from existing watercourses. They should not disrupt “the hydromorphology of existing waters. This applies in relation to the intake point, and at the point of discharge e.g., they should not impact the quality, quantity, temperature, oxygen levels of the receiving waters.”

Uisce Éireann note Inland Fisheries Ireland comments and this can be considered at project assessment level, where appropriate.

Sustainable / Reliable water supply

Dun Laoghaire Rathdown County Council suggested “the benefit of providing water treatment capacity in excess of normal demand and growth and obtaining raw water from independent sources.” Enterprise Ireland recommended Uisce Éireann “ensure consistent water supply/quality and quality wastewater infrastructure facilities.” They commented that client companies communicate concerns regarding capacity constraints with water treatment plants, and adequate capacity needs to be provided to operate without service interruption. Ibec highlighted that the reliability of water supply is arguably the single greatest consideration for existing business users. In the short term, they commented, there should be an “acceleration of preventative activities such as replacement of corroded leaky pipes and incremental upgrades to treatment plants. Ibec requested the rationalisation of abstractions and better connection of regional distribution networks to provide greater resilience.

See also further information provided in response to Action 1.4 under sub heading Sustainable/Reliable Water Supplies.

Risk management

The Irish Academy of Engineering identified the importance of the management of significant risks to improve resilience, stating the need for the utility company to “develop and deepen its level of understanding of those risks and options for their effective management.”

Risk management within Uisce Éireann supports our forward planning and facilitates well informed and proactive risk-based decision making across our activities. The principles outlined in Uisce Éireann’s Enterprise Risk Management (ERM) Policy guide our risk management practices. Uisce Éireann maintains an effective risk governance structure, including a comprehensive risk management process to manage, review, monitor and report on the principal risks and uncertainties that could impact our ability to deliver our strategic objectives.

Security of supply metrics

The CRU welcomed the commitment to delivering reliable water supplies to customers. “It is important appropriate mitigation measures and contingency plans are identified to ensure safe and reliable water supplies continue to be delivered to all customers.” The CRU suggested that “these projects are identified and planned with sufficient lead time and are procured with a view to value for money.” They commented that data must be captured and monitored for security of supply metrics as soon as possible to ensure that Uisce

Éireann can mitigate supply issues by taking early action and plan accordingly over the medium-to long term. The CRU outlined that they would like to see how the metrics and information will aid the identification of relevant issues for consideration holistically with those developed under resilience.

The Capital Investment Plan and Water Services Strategic Plan aligns to the objectives of the Water Services Policy statement including Availability and Reliability. Uisce Éireann is engaging with the CRU on a Security of Supply Index (SOSI) methodology that is applicable to Ireland as the proposed SOSI methodology in the RC3 Performance Assessment Framework is not optimal for use in Ireland due to the lack of connectivity in the water supply network.

6.2.6 Action 1.7: Use less water through promoting water conservation to help customers reduce their use

Summary of Action 1.7 Feedback

SWAN welcomed the commitment to water conservation and public awareness initiatives. An Fórum Uisce welcomed that “Uisce Éireann will be exploring opportunities for rainwater harvesting and the circular use of water, complementary to nature-based solutions for stormwater management as part of the development of their Water Conservation Strategy”. Louth County Council welcomed the emphasis on water conservation and increased capacities through leakage reduction within Strategic Aim 1 and will continue to assist in improving “security of supply in addition to lowering maintenance costs in the network.”

Rainwater harvesting & circular use of water

SWAN believed Uisce Éireann should make a stronger commitment to play a leading role in promoting rainwater harvesting and the circular use of water, in collaboration with other stakeholders, in particular National Water Conservation Working Group/ Cork Rivers Group, Gleann a'Phuca, and two individual stakeholders suggested a plan should be implemented to secure city-scale resources to incentivise rainwater harvesting in industrial and residential contexts to reduce water usage in the summer. They recommended collaboration with local authorities and regional assemblies in this regard. They also highlighted that clear engagement is needed with developers at the planning stage. A stakeholder stated that SUDS and critically rainwater harvesting should be considered at new houses and commercial buildings where all toilets are plumbed to rainwater tank while another suggested using grey water for all new housing. An Forum Uisce recommended that additional measures such as “regional and community rainwater storage need to be implemented to mitigate against drought vulnerability and to secure

future reliable water supplies. Inland Fisheries Ireland noted that they advocated “for the re-use of treated wastewater in agriculture and industry to reduce the need for primary abstraction from surface and groundwaters. Not only does this improve circularity but it also reduces pressures on surface waters.” Another stakeholder noted that SuDS should be included in the Plan and also “critically rainwater harvesting at new houses and commercial buildings where all toilets are plumbed to rainwater tank” as a way to conserve water use.

Uisce Éireann recognise the evolving importance of Rainwater Harvesting and other Circular Economy of Water approaches for the sustainable use of water, and we commit to participating with other national bodies to promote these measures and develop standards. In Action 1.7 we commit to exploring opportunities for Rainwater Harvesting and the Circular Use of Water, complementary to nature-based solutions for stormwater management. We will strengthen the wording of the WSSP to support participating in the work of the Water Conservation working Group. We would highlight however, that Uisce Éireann is willing to play our part in water conservation but we do not have the power to mandate third parties water conservation measures in their own infrastructure. This would require a combination of voluntary change in attitude and legislative changes to mandate things like rainwater harvesting and circular use of water in building regulations.

Uisce Éireann currently works with developers to determine if water efficiency measures could be taken, and the developer can reduce the projected required water demand. In August 2022, we launched a guide for the construction industry that sets out how builders and developers can achieve water conservation through measures such as innovative technology installations and rainwater harvesting systems. We ran Water Conservation Clinics, developed in partnership with the Construction Industry Federation (CIF), to offer training and guidance on how businesses can conserve water on site. Uisce Éireann is also exploring concepts for potential pilot projects with developers to determine if water efficiency measures could be implemented to reduce projected water demand.

Greywater and rainwater harvesting are private side measures that can potentially result in a reduction in demand (greywater) or a reduction in some peaking in dry conditions. Uisce Éireann actively seeks to incentivise customer-side greywater usage initiatives. We highlight that non-potable water supplies such as greywater, must be kept separate to treated drinking water in distribution networks and domestic-plumbing systems to prevent contamination. A parallel network of pipelines would be required to deliver a non-potable water supply. Due to the seasonality of rainfall in Ireland, a significant amount of storage would be required to ensure that rainwater harvesting is a viable option to address demand, particularly during dry periods. The space for the storage required to maintain supplies during dry weather would not be available at a typical domestic property. As outlined in Section 9.3 of the draft NWRP-SE, Uisce

Éireann will progress pilot projects to assess the potential outcomes and benefits of rainwater harvesting over the coming years."

We also commit to exploring the opportunities to implement RWH and water reuse where feasible on our operational sites and explore opportunities to reuse treated wastewater offsite. We commit to working in partnership with planning authorities and developers to implement community-based rainwater harvesting and other Circular Economy of Water solutions as part of integrated water supply solutions. However, we do not have power to mandate third parties to take such an approach under current legislation. We would welcome guidance on this and that relevant authorities use such powers available to them to mandate water conservation measures on developments, where appropriate.

Water efficiency

The CRU questioned whether any consideration has been given to making 'water efficiency' a legislative requirement within building regulations for new builds. The CRU appreciated this may be a conversation for the Department of Housing, Local Government and Heritage. However, they noted "in the UK, following a public consultation, water efficiency labelling will be mandatory on all household appliances which use water by 2025. The aim is for these labels to echo energy efficiency labels, with a category rating from A to F on household goods. The UK government estimates that using these labels will help reduce water usage by 20% per person by 2038". The CRU questioned whether there is merit in Ireland adopting this or a similar approach. They wished to see the above points considered by Uisce Éireann in the development of its RC4 Investment Plan. When assessing the RC4 Investment Plan, the CRU and its consultants will seek evidence that projects and programmes designed to address water safety, reliability and conservation (either directly or indirectly) have been considered and incorporated. IAE suggested water efficiency at consumer level could mitigate against leakage control and network management. "A rating system such as the energy rating for homes or a combined energy and water efficiency rating should be introduced, with the consumer benefit that efficiency will be rewarded." IAE noted alternative methodologies such as water efficient appliances, fittings, smart technologies and use monitors could cultivate a better understanding of water conservation in a domestic setting.

Uisce Éireann currently works with developers to determine if water efficiency measures could be taken, and the developer can reduce the projected required water demand. In August 2022, we launched a guide for the construction industry that sets out how builders and developers can achieve water conservation through measures such as innovative technology installations and rainwater harvesting systems. We ran Water Conservation Clinics, developed in partnership with the Construction Industry Federation (CIF), to offer training and guidance on how businesses can

conserve water on site. Uisce Éireann is also exploring concepts for potential pilot projects with developers to determine if water efficiency measures could be implemented to reduce projected water demand. We commit to working with the DHLGH and NSAI, and industry bodies, to develop water efficiency standards, including water efficiency labelling. We also engage closely with UK/EU research groups to remain informed of the latest developments and ambitions for water efficiency and conservation. We are supportive of water efficiency measures at consumer level however, we have no power to mandate this in developments. This requires legislative change, which we would be supportive of.

6.2.7 Action 1.8: Use less water through developing and implementing an enhanced Water Stewardship Programme

Summary of Action 1.8 Feedback

Expansion of Stewardship Programme

The CRU commended the 'Stewardship Programme' for "improving awareness around the importance of water conservation measures in large non-domestic users." The CRU recommended the expansion of the Stewardship Programme to further its future impact by including either a section for trade effluent customers or potentially a dedicated programme aimed at reducing effluent volume/strength. The CRU also asked whether Uisce Éireann would make the Programme available to all non-domestic users over the lifetime of the WSSP 2050.

In response to the CRU, we will continue to explore opportunities to expand the water stewardship model as appropriate to more business sectors; and will participate with industry and standards organisations to investigate new technologies and services to achieve sustainable water usage. A new Trade Effluent Stewardship Programme is under development to support Uisce Éireann trade effluent customers in understanding and adapting to the upcoming changes in trade effluent charges. The key focus is on delivering a comprehensive Water Stewardship Programme to educate customers on best practices for trade effluent management, helping them reduce costs and align with sustainability goals. The programme will be piloted at the end of the year, ensuring readiness for the new charges set for 2026. Versions of the programme will be expanded across business sectors incrementally, e.g., the Acute Hospital sector (with HSE).

Small and medium sized enterprises

Enterprise Ireland encouraged the additional support "to help SMEs implement water reducing technologies on site and to reduce the volume of wastewater discharged to UE's

wastewater treatment plants.” They recommended the implementation of practical support measures for businesses, especially when there is an increasing expectation for companies to invest in on-site wastewater treatment before they can discharge wastewater into the Uisce Éireann network. This, they noted, poses “significant financial and technical challenges to many businesses”. Enterprise Ireland also recommended a strong consideration of cost reduction proposals in support of this long-term challenge.

Uisce Éireann welcomes Enterprise Irelands comments. We launched the Water Stewardship for SMEs Programme last year in partnership with the SFA. The programme delivers:

- *Discover best practices in water stewardship.*
- *Learn how to conduct a water audit.*
- *Find practical efficiency actions tailored to their business.*
- *Do at own pace online, achieve a cert supported by EWS.*

We acknowledge the grant aid made available from Enterprise Ireland for water efficiency measures developed by companies in Ireland and will commit to working with industry representative groups to participate in trials of water reducing technologies with potential for wide-scale roll-out.

Water efficiency

Ibec also stated “Uisce Éireann’s Water Stewardship certification should reach a greater pool of businesses. Changes to Irish Building Standards that would mandate more water-efficient taps and showers in new domestic and commercial properties would go a long way in support conservation efforts”. Ibec also recommended collaboration with other stakeholders to encourage retrofitting appliances in existing properties, potentially in conjunction with energy efficiency retrofits.

We note Ibec’s comments and are committed to working with the DHLGH and NSAI, and industry bodies, to develop water efficiency standards, including water efficiency labelling. We also engage closely with UK/EU research groups to remain informed of the latest developments and ambitions for water efficiency and conservation. We’re committed to extending our programmes to train all of our business customers across Ireland, setting the standard for water stewardship and inspiring global adoption of these best practices.

6.2.8 Action 1.9: Lose less water through delivering leakage reduction

Summary of Action 1.9 Feedback

The CRU was pleased to see the inclusion of leakage in the draft WSSP 2050 and agreed that addressing leakage is critical to securing a reliable and sustainable water supply. With “the requirement of Uisce Éireann to measure leakage levels under Statutory Instrument No. 99 of 2023, Uisce Éireann can use this as an opportunity to improve conservation efforts, reduce abstraction rates, and ensure efficient investment when meeting future EU Commission leakage targets.” The CRU are committed to set realistic achievable leakage targets which will act as milestones for Uisce Éireann to achieve over the course of the WSSP 2050. This is in recognition of, and to support, Uisce Éireann’s need to balance growing demand and alongside ensuring long-term sustainability of water supplies. The EPA welcomed “the inclusion of drinking water leakage reduction in the WSSP and that it is linked to Uisce Éireann’s and Ireland’s obligations under the recast Drinking Water Directive”.

Water main replacement

A stakeholder stated that the best way to reduce leakage rates and obtain clean drinkable water is to replace the old water main pipes. The stakeholder also recommended Capital Investment in the overall water infrastructure and technology. Councillor Pat Dunphy noted “A lot of leaks. Pipes need to be replaced at a much faster pace.” The Irish Academy of Engineering stated that “Ireland’s distribution network is between 65 to 85 years old. Our leakage rates are very high. To achieve a national leakage rate of 25% by 2030 will require substantial additional investment.” Another stakeholder noted the infrastructure has to be improved in rural communities and that water main repair is not sufficient. Cllr Pat Dunphy noted that there are a lot of leaks and that pipes need to be replaced at a much faster pace.”

We continue to work with the CRU to explore opportunities to expand the scope of the First Fix Free scheme to include more plumbing losses, and the Water Conservation Strategy is expected to propose further measures to address customer-side leakage. Targeted water mains replacement is a core element of our National Leakage Reduction Programme and is set out in section 7.3.1 of the NWRP Framework Plan. As per the NWRP, sustained leakage reduction involves first establishing the data and information to allow us to understand our networks (a process which is ongoing) and then implementing a range of interventions, including: Effective management of excess pressure and pressure transients Speed and quality of repairs Active Leakage Control (ALC) District Metered Area (DMA) optimisation Asset renewal, including: - Valves

and controls - Targeted mains replacement - Service connections. The above represents industry best practice and aligns with EU Reference Document “Good Practices on Leakage Management” (WFD CIS WG PoM).

We are committed to leakage reduction including in rural communities. Uisce Éireann will support the NPF, which advocates for strengthened rural communities. Uisce Éireann programmes that help to support growth in rural areas include the Source Protection Programme, Small towns and villages growth programme and the Inlet Works and Storm Sludge Programme. We have added text to our WSSP to highlight this commitment. Uisce Éireann investment planning considers all areas served by public water and wastewater networks, urban and rural. As noted in Section 9.1, ‘As the investment needs across the asset base will always exceed the available funding (for the foreseeable future), prioritisation is carried out as part of the investment planning process so as to ensure alignment with the Government’s priorities as set out in the Water Services Policy Statement (WSPS).’

First Fix Free Scheme

The CRU recognised that the First Fix Free Scheme is a “valuable benefit to customers who experience private-side issues with leaks which can be financially burdensome to fix and may lead to a significant volume of lost water over time.” The CRU suggested that they would welcome any expansion to First Fix Free or similar such schemes, in terms of scope (noting that it is currently limited to leaks located on external supply pipes). The CRU also asked if there is a case to be made for the creation of a ‘hardship fund’ that can be drawn upon by customers who experienced issues in financing private-side leak repairs or high level of water loss from a customer’s premises.

In response to the CRU the First Fix Free scheme addresses leakage on the customer side of the connection and we regard it as a water conservation measure primarily. We welcome the willingness of the CRU to explore expansion of the First Fix Free programme, noting that recent experience from the UK and Ireland suggests that the volume of water lost from internal plumbing losses is as great as the losses from service pipes. The water losses from internal plumbing systems are currently outside the scope of the First Fix Free Programme. We also note that any scheme to support customers suffering private side leaks should be developed with regard to insurable water damage under standard policies. We would welcome a “Solidarity Fund” to support customers who require assistance to prevent internal plumbing losses and repair faulty fittings, such as leaking toilets and dripping taps. We would recommend that such a fund be used by Uisce Éireann to provide an extended form of the First Fix Free Scheme, based on home visits from qualified customer service agents to ensure that the fund is used effectively and efficiently. Such a fund would not extend to cover insurable losses from water damage.

Leakage & water reuse

Inland Fisheries Ireland recommended that Action 1.7 should also include an assessment of leakage of waters at the Drinking Water Treatment Plants. In addition, they suggested that water conservation should include specific timebound targets for the proportion of treated wastewater re-used for non-human consumption. Such as the re-use of treated wastewater for agricultural and industrial purposes. We note IFI comments on water conservation.

Action 1.7 refers to our Water Conservation strategy, this considers measures to address leakage on the public side including from Uisce Éireann infrastructure. Our conservation strategy will also consider the use of treated wastewater and is discussed in more detail in our response to action 1.7 and action 1.8.

6.2.9 Conclusions on Strategic Objective 1

Having carefully reviewed the submissions received on Strategic Objective 1 Uisce Éireann have considered the following recommendations should be provided in the WSSP 2050.

Clarifications on Strategic Objective 1

Section 4.2, Action 1.1 - As requested by the EPA, we will include text under action 1.1 of the WSSP highlighting how the implementation of the DWSP will resolve supplies on the EPA's RAL initially and then move to a more proactive approach to improve drinking water supply resilience.

Section 4.2, Action 1.3 and Section 6.4, Action 3.8 – In response to An Forum Uisce and SWAN's recommendations to put further emphasis on Integrated catchment management we have changed Action 1.3 to *“Coordinate Integrated catchment management measures and champion nature-based solutions for improving source water quality”* and Action 3.8 to *“Champion nature-based solutions and integrated catchment management measures in the delivery of water and wastewater projects”*.

Section 4.2, Action 1.3 - To highlight the *“benefit water quality, aquatic habitats and aquatic biodiversity more generally”* we have updated Action 1.3 as follows: In adhering to the principle of *“control the source in preference to end-of-pipe solutions,”* our proactive approach not only aligns with regulatory directives but also underscores our commitment to sustainable, nature-based solutions that secure the quality and integrity of the drinking water we provide to our communities *and provides added benefits for general water quality, aquatic habitats and aquatic biodiversity”*.

Section 4.4, Action 1.7 - We have strengthened the wording of Action 1.7 to “participate in the work of the Water Conservation working Group”.

Section 4.4, Action 1.9 - We have added text to Action 1.9 to highlight our commitment to leakage reduction in rural communities.

6.3 Strategic Objective 2: Support our Customers, Communities and the Economy

In this chapter, we summarise the key references in submissions to issues under Strategic Objective 2. Within the overall heading of Strategic Objective 2 there were 86 references. We have further categorised references under the Actions as identified in the draft WSSP 2050. We deal with each of the Actions in this chapter, setting out first a summary of the relevant references in the submissions, followed by our response.

In our response survey, several stakeholders welcomed Strategic Objective 2 and highlighted better communication, engagement and collaboration as key for implementing this objective. Stakeholders including; CRU, An Taisce, EPA Inland Waterways Association of Ireland and An Forum Uisce all welcomed the aims and actions under Strategic Objective 2.

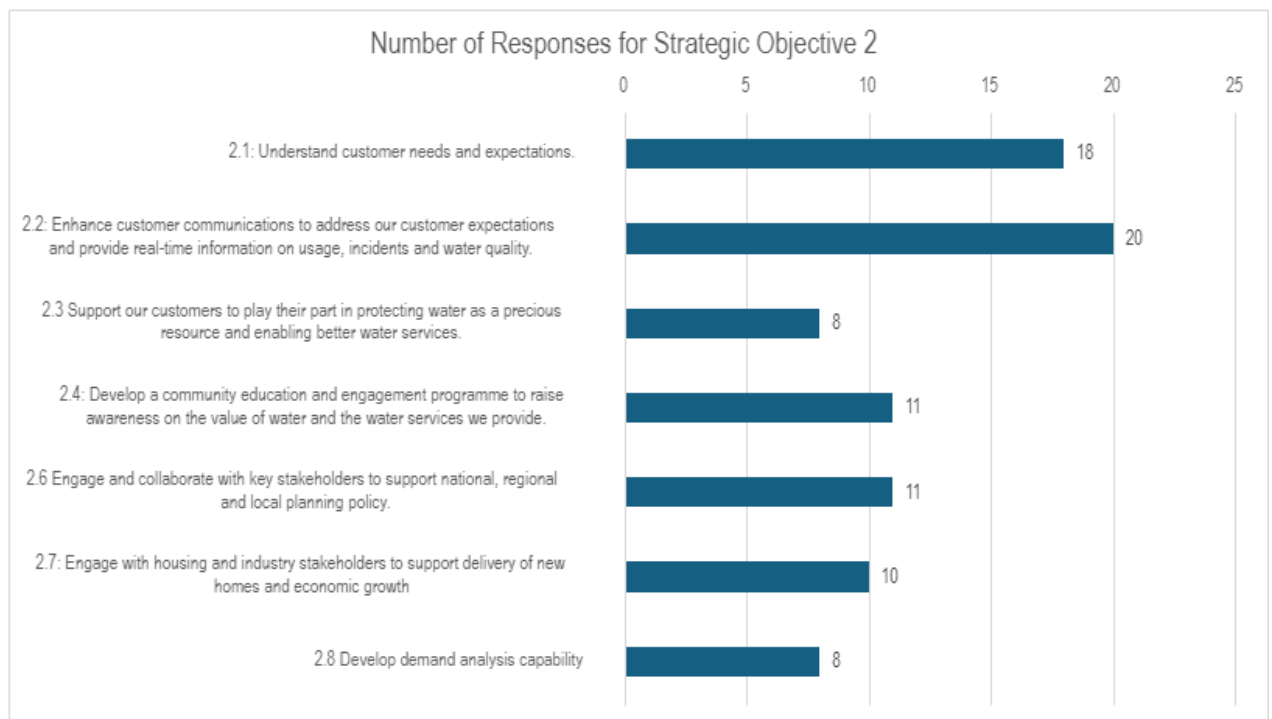


Figure 10 Number of Responses for Strategic Objective 2

6.3.1 Action 2.1: Understand customer needs and expectations.

Summary of Action 2.1 Feedback

Future populations' needs

The Irish Homebuilders Association (IHBA) and The Construction Industry Federation (CIF) noted Action 2.1 as an important aspect of any customer facing business but must include “objectives that will deliver long term for future populations’ needs, increased population figures, increased housing targets and actionable items that Uisce Éireann will undertake to meet these requirements”. They also referenced the draft National Planning Framework which recommended an increased housing delivery target of at least 50,000 units per annum.

Uisce Éireann are engaging on draft National Planning Framework through the consultation process. Uisce Éireann is committed to playing its part in the national drive to provide homes to people who need them, providing a safe and secure supply of water and wastewater treatment to homes across Ireland that will ensure quality of service for years to come is our priority. We must also prioritise the timely delivery of connections.

Uisce Éireann follow a plan-led growth approach through engagement with planning authorities in the development of statutory plans such as Regional Spatial Economic Strategies, City and County Development Plans and Local Area Plans. The draft WSSP 2050 outlines our strategic direction to deliver water services at a national level. We have aligned with the National Planning Framework (NPF), as appropriate, and considered updates during drafting. Our supporting processes include engagement with the Department of Housing, Local Government and Heritage regarding capacity for new housing developments. Our Strategic Aim on “Providing for growth” is supported by Action 2.6 to “Engage and collaborate with key stakeholders to support national, regional and local planning policy”. Uisce Éireann produce capacity registers annually to provide an indication of the available water and wastewater treatment capacity to assist planning authorities in their forward planning activities. We are engaging with the Department of Housing, Local Government on the draft National Planning Framework, the recommendation of which will inform our growth approach.

Communication with affected communities

A stakeholder highlighted that there is a need to “consult with all people in the affected areas”, work needs to be collaborative and should be scheduled in conjunction with utility providers. ULSSRA suggested that weekly website updates would be useful. Another

stakeholder requested that Uisce Éireann liaise with other utility providers when planning improvement works to minimise disruption and unnecessary duplication of work.

Uisce Éireann have a customer codes of practice that is set by our regulator which sets out requirements for communications. Uisce Éireann works in collaboration with organisations across Ireland to foster cohesive working arrangements when planning and delivering our projects. We work with other organisations such as the ESB, Transport Infrastructure Ireland (TII), Irish Rail/CIE, Waterways Ireland, EirGrid, Inland Fisheries Ireland, the Office of Public Works (OPW), Local Authority Roads Departments, Gas Networks Ireland (GNI) in several forums. Where opportunities present themselves, we work together and meet to discuss projects and plans. An example of this collaborative way of working is Uisce Éireann's membership of the Dublin Infrastructure Forum Technical Working Group, which coordinates the planning, development, implementation, and monitoring of various government and state-sponsored projects. The forum includes representatives from EirGrid, Dublin Airport Authority (DAA), TII, National Transport Authority (NTA), Irish Rail, GNI, ESB, Waterways Ireland, and the Dublin Local Authorities

Deliver a customer-centric approach

The CRU suggested that Uisce Éireann develop a targeted approach to capture customer views and “undertake meaningful research that leads to the enhancement of customer services, delivery of information to customers, and how customers can contribute to achieving some of the strategic objectives outlined in the WSP 2050”. The CRU commented that a “measurable and reportable aim for the WSP 2050 should include how Uisce Éireann will deliver more for its customers, and broader value to the environment (to the required standard) while also reducing the cost of doing so”. The CRU agreed with Uisce Éireann, that meaningful engagement with all its customers and communities at large is fundamental to achieving this aim and is eager to see the plans on how it will prioritise areas that require urgent action in the short term and how Uisce Éireann plans to commence delivery of these aims. The CRU agreed with the aim in the draft WSP 2050 on the need for a strong focus on customers. They noted it as crucial that Uisce Éireann quickly identify the plans and measures required in the short, medium and long-term to enable step changes to enhance and improve on the services and protections to its customers and to keep continually attuned to all its customer expectations.

Uisce Éireann welcomes CRU's comments on Action 2.1. As set out in Action 2.1 we plan to evolve our approach to customer research to help us to understand customer expectations. UE's Customer Strategy outlines our strategic initiatives and ambitions to deliver a customer-centric organisation. The strategy set out short- and medium-term strategic initiatives and the establishment of a Customer First governance forum that will monitor delivery of the strategic initiatives. The strategy will be reviewed periodically and a full refresh of the strategy in year 5.

Other business strategies that are relevant to improving our customer centricity will be included in the Customer First governance forum.

6.3.2 Action 2.2: Enhance customer communications to address our customer expectations and provide real-time information on usage, incidents and water quality

Summary of Action 2.2 Feedback

Data sharing & spatial tools

Gleann a'Phuca, and Cork Rivers Group suggested that an accessible spatial tool to report or map pollution or ecological issues or incidents related to waterways and rivers would be benefit with quarterly updates by Uisce Éireann on how the issues are addressed. Green Spaces for Health recommended a live map hosted by Uisce Éireann the location on the river where specific concerns are located. An Taisce recommend that open-source data is made available to the public to enhance transparency and to make informed contributions to public consultations. "A key example of such critical data is information regarding abstraction activity (location, quantities abstracted) to allow for public awareness of potential environmental impacts arising from this activity". For long-term transparency An Taisce recommend that specific commitments should be in place to make project details, timelines and expected outcomes available to stakeholders and the public, as well as the requirements and compliance with the Urban Wastewater Treatment Directive or the Water Framework Directive.

Uisce Éireann is in the early stages of its data maturity journey. However, during the course of this Water Services Strategic Plan 2050, it is also committed to embracing the requirements of the EU Open Data Directive's High Value Datasets (HVD). Uisce Éireann is cognisant of the of the requirements of the Directive in regard to HVD's. These datasets are defined as documents, the re-use of which brings significant benefits for society, the environment, and the economy. As outlined in Article 14 of the EU Open Data Directive, the identification of specific HVDs is based on their potential to:

- *Generate significant socioeconomic or environmental benefits and innovative services.*
- *Benefit a high number of users, particularly SMEs.*
- *Assist in generating revenues.*
- *Be combined with other datasets.*

Uisce Éireann has already begun publishing elements of its data on our website and linking it to the Open Data portal.

Uisce Éireann report all Wastewater incidents to the EPA. This includes any discharge that does not comply with the requirements of our licence. Any incident with the potential for environmental contamination of surface water or groundwater, or posing an environmental threat to land, or requiring an emergency response by the relevant Water Services Authority. These are also included in Wastewater Authorization Annual Environmental Reports which can be found on both the EPA and Uisce Éireann websites. The proposed recast rUWWTD requires that Member States ensure that adequate, easily accessible, and up-to-date information on urban wastewater collection and treatment will be made available to the public online. Further information on these details and the format and timing of the information may follow in subsequent implementation acts. Uisce Éireann will be reviewing this matter with all relevant stakeholders as part of the forthcoming work relating to the implementation of the rUWWTD.

The Water Environment (Abstractions and Associated Impoundments) Act, 2022 only recently commenced (August 2024). The associated regulations have also been published and we understand that the EPA are currently preparing licensing guidelines. In accordance with the Abstraction Act, Uisce Éireann will have to apply for licences for our existing abstractions, which are above threshold and any other abstractions which the EPA deem “significant”. This is a new regime, and data will be gathered and published during the licensing process. Since 2018 there has been a legal requirement to register all abstractions (including details of volume, location etc.) with the EPA and the EPA holds the central register.

Uisce Éireann in advance of and to assist in the licensing process developed the first National Water Resources Plan. This provides details of all our abstractions and an assessment at a desk-top level.

Community engagement

Upper Leeson Street Area Residents Association (ULSARA) suggested that Strategic Aim 5 and 6 are integral to each other as “engaging with communities is central to delivering for customers”. They commented effective engagement with community organisations will minimise the challenges in winning customer support and understanding. They highlighted recent examples where they have found it difficult to engage with Uisce Éireann and request improvements in this regard.

Uisce Éireann agree with upper Leeson streets Residential association that engaging with communities is key to delivering for customers. Many of the objectives, aims and actions of the Water Services Strategic Plan overlap, interact and are dependent on each other, including for example strategic aim 5 and 6, we will further highlight this interaction and dependency in the plan. We have a number of initiatives outlined in our customer strategy that would support better engagement with our customers and communities. Uisce Éireann’s Customer Strategy outlines our strategic initiatives and ambitions to deliver a customer-centric organisation. The

strategy set out short- longer term strategic initiatives and the establishment of a Customer First governance forum that will monitor delivery of the strategies initiatives. The strategy will be reviewed periodically and a full refresh of the strategy in year 5. Other business strategies that are relevant to improving our customer centricity will be included in the Customer First governance forum. Examples of some initiatives include Operational enhancement of our Local Representatives Service Desk, increased technical support in contact centre, our text notification service and our customer self-service platform.

Uisce Éireann have a customer code of practice that is set by our regulator which also sets out requirements for communications. Where there is an infrastructural project, we engage via our project and community teams.

Following feedback from communities around the country Uisce Éireann is launching a new communications channel direct to local community groups. This new avenue will allow us to share key public health information with community groups across Ireland on their social media pages. Uisce Éireann have collated a database of community groups – a county-by-county list – from information that is already available on social media. These lists are made up of a variety of community-based groups from Tidy Towns groups to GAA and rugby clubs, to parish councils and angling organisations. In the event of a water quality issue in their area we will provide an update to these groups and seek their support to share our key public health information with their followers. Community contacts will see our messages shared more widely on social media. This initiative will be in addition to communications we issue direct to registered vulnerable customers, media, public representatives, and other organisations who in turn circulate them among their audiences and constituents. Community Contacts will enhance Uisce Éireann's ability to communicate directly with communities across the country. Also, we have recently launched our SMS notification service which is offered/available to all 1.6m customers and interested bodies.

Communication regarding interruption of services

Ibec commented where planned or unplanned outages occur, Ibec recommended a multi-channel messaging to affected customers which they suggested would see particular uptake from large scale non-domestic users.

Uisce Éireann welcome the comment by Ibec on Action 2.2 and have the opt in text alert 'Outage Notification Service' option in place. Uisce Éireann's new national public information campaign - which focuses on our new free Outage Notification Service. The service was launched by the Customer Service Team last month as part of our remit to keep customers informed: it's a free text alert service which enables people to get water service updates if there is an issue that affects the water supply to their home or business. We had an advertising campaign promoting this.

Customer strategy

The CRU acknowledged that “due to the discontinuation of domestic water charges and the non-existent billing of domestic customers, Uisce Éireann may not be in a position to communicate directly with domestic customers to notify them where water is unfit for human consumption and where alternative supply arrangements are in place”. The CRU requested Uisce Éireann consider ways in which it can develop direct forms of communication with its customers over the coming years. The CRU suggested Uisce Éireann increased awareness of vulnerable customers register, Both LAWPRO and Tipperary County Council welcomed the recognition to deliver for customers and communities. They noted as key clear communication with local communities and key stakeholders as critical aspect of service delivery. TCC requested a Communication Strategy that would provide clarity and certainty to communities and stakeholders. TCC requested that the final Plan commits to improving public service communications. They further suggested a dedicated communications strategy for the elected council members to ensure “early and accessible access to information particularly in relation to outages and boil water notices.”

UE's Customer Strategy outlines our strategic initiatives and ambitions to deliver a customer-centric organisation. We have a number of initiatives outlined in our customer strategy that will support better engagement with our customers and communities. The strategy set out short- and longer-term strategic initiatives and the establishment of a Customer First governance forum that will monitor delivery of the strategic initiatives. The strategy will be reviewed periodically and a full refresh of the strategy at year 5. Other business strategies that are relevant to improving our customer centricity will be included in the Customer First governance forum. Uisce Éireann recognises that some of our customers have different needs when it comes to using our water services and communicating with us due to age, disability or medical conditions. In adherence to the customer handbook, we have a priority and special services register. Registration is via our website and through our customer contact centre. We actively promote this register if a customer makes us aware that they are in one of these categories, and we are also looking at other ways to promote the register through a wide range of communication channels on an ongoing basis.

Uisce Éireann has a Local and elected representative support desk. The Local and Elected Representative Support Desk is a dedicated service for political representatives nationwide. The service itself is delivered by our colleagues in the customer contact centre and managed by the LRSD/ERSD Team in Customer Operations. The Local and Elected Representative Support Desk is open from Monday to Friday, 09:00 – 17:30 (excluding Bank Holidays). For any urgent matters outside of these times, a priority service for Local/Elected representatives is available on our Customer Service line. The usual contact channels are still available to reps at this time. Contact

details are: LRSD (Phone): 0818 178 178, (Email): localrepsupport@water.ie, ERSD (Phone): 0818 578 578, (Email): oireachtasmembers@water.ie

Real-time information to customers

CRU welcomed the idea that Uisce Éireann will be providing a 'real-time' digital service for customers. The CRU further welcomed clarity on this service in future publications and the type of platform it will be on, SMS, web or email. The CRU suggested that Uisce Éireann learn from the example set by other utilities such as the ESB Networks use of an interactive and live 'Service Interruption Map' which allows customers to input their mobile number to be updated on current and specific works through the 'Keep me updated' option. This would help improve Uisce Éireann's communications while also helping to empower and protect customers. Another stakeholder suggested live website updates for boil water notices and fixes.

The ambition is to provide "real time information to our customers" and due to this we would need to upgrade systems and processes and keep informed of new and emerging technologies. The Uisce Éireann Customer Strategy outlines a number of initiatives that will support this longer-term ambition such as, improving accuracy and timely information from the field, SMS notification service (detailed below) phase 1 and subsequent phases to improve this service. Uisce Éireann have a new national public information campaign - which focuses on our new free Outage Notification Service. The service was launched by the Customer Service Team in August 2024 as part of our remit to keep customers informed: it's a free text alert service which enables people to get water service updates if there is an issue that affects the water supply to their home or business. We had an advertising campaign promoting this. This is the first time our customers, across 1.6 million households, will be able to sign up and get notifications for their area. This service is vital for inspiring confidence and strengthening our reputation to become Ireland's trusted water service utility. The aim of the national public information campaign is to clearly articulate the benefits of our new service and explain how people can sign up simply at water.ie. The campaign means we will reach audiences nationwide with high-profile advertising presence on RTÉ television, TG4, Virgin Media, Channel 4 and Sky TV, plus radio such as RTÉ, Newstalk and Today FM as well as local radio stations all over Ireland. Our adverts will also reach the public through digital channels like podcasts and online media players. We'll also have a presence on social media, including Facebook, Instagram, X, Tik Tok and LinkedIn, colourful messaging that reflects the benefits of the text alert service.

Complaints

The CRU noted that customers often have difficulty understanding the status of their complaint investigations, queries or work orders/site visits. They suggested consideration of any customer interface that would enable customers to easily understand the status of their complaints/queries, particularly in relation to Service Level Agreements set by Uisce

Éireann in its Code of Practice/Customer Charter. They further noted that customers occasionally find SMS updates from Uisce Éireann difficult to interpret and suggested innovations aimed at improving customers' understanding of their complaint/queries. Gleann an Phuca and Corks River Group recommended that the complaints procedure be improved through the implementation of contact points for regional districts and local catchment areas. The EPA commented on the omission of the importance of Uisce Éireann's complaint handling process. The EPA highlighted their experience is that many odour and noise complaints are not adequately investigated, resolved, and communicated to complainants. The EPA requested that the "complaint handling should be called out specifically in the WSSP as an area that Uisce Éireann will be working to improve over the course of the WSSP".

Following an investigation in 2022 by the CRU into Uisce Éireann's approach to resolving customer complaints, a recommendation was made for Uisce Éireann to carry out a benchmarking exercise against other UK water utilities to identify best practice and potential improvements in IW's processes in relation to complaint categorisation. The recommendations were presented to the CRU and a decision was made that Uisce Éireann should implement a process whereby a "sentiment check" would be carried out with customers at the end of each call into the customer contact centre. A sentiment check enables Uisce Éireann to identify whether the customer issue should be categorised as a complaint or otherwise at the end of the first contact making it clear to both parties what the next steps would be.

Notification of leaks

"A stakeholder also requested that the process to notify Uisce Éireann of a leak or watermain burst be more straightforward.

Uisce Éireann welcome the comment by the stakeholder on Action 2.2 and have a dedicated page on the Uisce Éireann website where a leak can be reported. [Report a Leak on Public Property | Contact | Uisce Éireann \(formerly Irish Water\)](#) This is then passed to the call centre for follow up.

Maintenance and repair

Councillor Peter Melrose commented that there seems to be confusion around responsibility for maintenance and repairs and requested clarity.

Uisce Éireann welcome the comment by Councillor Peter Melrose on Action 2.2. We are responsible for the maintenance and repair to public water services infrastructure up to the boundary of a private property. Details outlined on the Uisce Éireann website³.

³ <https://www.water.ie/help/pipe-maintenance-responsibility>

Engagement on public health & source protection

LAWPRO suggested improvement in the communication on the causes behind boil water notices or outages, where the causes are due to contaminants and are known so relevant stakeholders are made aware of their responsibilities when it impacts on water supplies. LAWPRO acknowledged Uisce Éireann's commitment to engaging with housing and industry stakeholders to plan for future service needs and suggested this include engagement with the agricultural sector on source protection particularly from grassland herbicides such as MCPA and glyphosate.

Uisce Éireann welcomes LAWPRO's submission. We regularly monitor and test all water supplies. If we find harmful bacteria or pathogens in water samples, we:

- *Consult the Health Service Executive (HSE), Ireland's public health authority.*
- *Tell affected customers if our consultation with the HSE determines there is a risk to public health.*
- *Place a Boil Water Notice or Do Not Consume notice on the water supply.*
- *Report the issue to the Environmental Protection Agency (EPA).*
- *Investigate the cause of the issue and correct it.*

To protect public health, we sometimes we issue a notice before test results confirm the risk. We do plan to engage with the department of Agriculture and other relevant stakeholders as part of our source protection and catchment management activities as detailed in Action 1.3.

Water fountains & circular use of water

A stakeholder queried whether all water fountains were in use. The same stakeholder also suggested an improvement to home wastewater recycling.

Uisce Éireann are engaging with the Department through the drinking water expert group to ascertain national requirements for drinking water fountains. Water conservation measures such as grey water recycling and rainwater harvesting are considered as part of our water conservation strategy. We are committed to and understand the importance of engagement with other infrastructure providers as we plan and deliver new and upgraded services.

Uisce Éireann has recently completed a Drinking Water Fountains pilot scheme with a number of Local Authorities in the Dublin Area. The final 'Drinking Water Fountains Pilot Report' was issued to the Department of Housing, Local Government and Heritage and also to the Department of Enterprise Climate and Communication to support consideration of a wider national rollout of Drinking Water Fountains.

6.3.3 Action 2.3 Support our customers to play their part in protecting water as a precious resource and enabling better water services.

Summary of Action 2.3 Feedback

Customer & community education

An Forum Úisce acknowledged Uisce Éireann's focus on water conservation and customer education and communication on water conservation measure

A stakeholder suggested opportunities to identify actions to educate the public, local authorities, and elected representatives to the risks of wastewater for rivers and waterways. Green Spaces recommended that the plan should include a strong commitment to raising awareness amongst the public on the risks of wastewater for our rivers. A stakeholder suggested opportunities to identify actions to educate the public, local authorities, and elected representatives to the risks of wastewater for rivers and waterways.

As set out in Action 2.3 regarding wastewater we aim to embed a broader understanding of the wastewater process with our customers and communities, including the need for new and sustainable solutions to wastewater management to protect the environment. It is important to gain public support and understanding for this infrastructure which often attracts initial. Uisce Éireann is launching a new communications channel direct to local community groups. This new avenue will allow us to share key public health information with community groups across Ireland on their social media page. We have collated a database of community groups – a county-by-county list – from information that is already available on social media. These lists are made up of a variety of community-based groups from Tidy Towns groups to GAA and rugby clubs, to parish council. In the event of a water quality issue in their area we will provide an update to these groups and seek their support to share our key public health information with their followers. Community contacts will see our messages shared more widely on social media. This initiative will be in addition to communications we issue direct to the vulnerable customers, media, public representatives, and other organisations who in turn circulate them among their audiences and constituents. Community Contacts will enhance Uisce Éireann's ability to communicate directly with communities across the country. Also, we have recently launched our SMS notification service which is offered/available to all 1.6m customers and interested bodies.

Community engagement

The Cork Rivers Group requested Uisce Éireann support their work on the ground and engage with them. The Group commented there is growing concern across different local areas for the state of rivers and waterways in the Cork region and a need to take action to protect and nurture them. The Group suggested that they can be a "vital pathway to ensure

this strategy is implemented through a meaningful collaboration with local communities". The Cork Rivers Group, Gleann a'Phuca, Green Spaces for Health, and an individual stakeholder outlined that supporting local communities and groups who advocate for rivers is key to ensure local protection of water environments and ecosystems and should be more explicit under strategic objective 4. They recommended "a key action in this section of the plan to frame relationships between Irish Water and communities as bidirectional and mutually fruitful."

We set out actions to protect the environment under Strategic Objective 3. Our community education and engagement programme will cover both the protection of water supplies and the protection of the environment. Uisce Éireann are committed to building on our current engagement and collaboration as set out in the WSSP. Uisce Éireann continues to engage within the RBMP three-tiered governance and implementation structure, the purpose of which is to ensure an integrated and cooperative approach to developing and implementing river basin management plans. The requirement in the Water Action Plan 2024 for the development of 46no. Catchment Management Work Plans will further facilitate an integrated catchment management approach by bringing together Sectoral Action Work Plans from each sector at water body scale.

We would also highlight that a core function of LAWPRO is to work with community groups to support the work already being done to promote better water quality, and to encourage more groups to get involved. Community involvement is key to the protection and management of local water bodies. This is being achieved through a three-stage process:

- *Raising awareness of LAWPRO and engaging communities on local water quality issues and concerns.*
- *Supporting community involvement in the stewardship of local streams, rivers, lakes, and coasts.*
- *Building capacity within local communities through knowledge funding and training.*

LAWPRO's is building networks of active communities with the knowledge, skills, and capacity to make a difference. In this way, LAWPRO's 13 Community Water Officers have established themselves as contact points for local communities. This is clear by the growing number of groups and champions getting involved in caring for their local water environment. Increased public participation in the river basin management planning process will be achieved by the establishment of Catchment Community Fora during the lifetime of the third cycle. These Fora will build on the capacity within communities to identify and implement measures, with the objective of producing Community Action Plans.

Uisce Éireann are committed to building on our current engagement and collaboration as set out in the WSSP. Uisce Éireann continues to engage within the RBMP three-tiered governance and implementation structure, the purpose of which is to ensure an integrated and cooperative approach to developing and implementing river basin management plans. The requirement in the Water Action Plan 2024 for the development of 46no. Catchment Management Work Plans will further facilitate an integrated catchment management approach by bringing together Sectoral Action Work Plans from each sector at water body scale.

Engagement on Environmental and ecological issues

Gleann a'Phuca, Cork Rivers Group and an individual stakeholder commented that the actions in the draft WSSP 2050, related to communication with customers, are mainly focused on drinking water. They recommended that the strategic focus is broadened to consider environmental and ecological issues and opportunities associated with ensuring reliable water supplies and conserving resources.

We welcome the comment by Gleann a'Phuca, Cork Rivers Group and an individual stakeholder on Action 2.3 and set out actions to protect environment under Strategic Objective 3. Our community education and engagement programme will cover both the protection of water supplies and the protection of the environment. For example, in action 2.4 we have committed to educating customers and the communities on the processes involved to safely discharge treated wastewater to the environment

Collaboration on catchment management & nature-based solutions

Green Spaces for Health discussed an ecology report of the Glasheen river (July 2024) that they have commissioned and request to collaborate with Uisce Éireann on their findings and work to efficiently identify misconnections and sewerage outflows. They further noted the need to collaborate with Irish Water and other appropriate local bodies to identify nature-based solutions for all rivers but in this instance specifically for the Glasheen River.

Uisce Éireann welcome the comment by Green Spaces for Health on Action 2.3. We set out actions to protect the environment under Strategic Objective 3. Our community education and engagement programme will cover both the protection of water supplies and the protection of the environment. It is our intention that collaboration and working with communities will be the key to finding opportunities for catchment management and nature-based solutions and supporting their delivery on the ground.

6.3.4 Action 2.4: Develop a community education and engagement programme to raise awareness on the value of water and the water services we provide

Summary of Action 2.4 Feedback

Increase local knowledge and experiences

Gleann a'Phuca, Cork Rivers Group and one individual commented that under Strategic Aim 2.4 Uisce Éireann should ensure that resources and support are provided to embrace and elevate local knowledge and experiences of communities and catchment areas.

Uisce Éireann welcome the comment by Gleann a'Phuca, Cork Rivers Group and one individual on Action 2.4. Uisce Éireann set out how we plan to engage with communities in Action 2.4. Uisce Éireann have a number of initiatives set out in our customer strategy that support this engagement including, for example Increase 'Technical Support' in Contact Centre and for Agents. Uisce Éireann also have a sustainability ambition of educating 1 million people on the value of water.

Promote conservation efforts

The CRU noted that engaging with communities offers valuable opportunities to improve Uisce Éireann's contact with households but also to further conservation efforts by spreading awareness. The CRU queried if Uisce Éireann has any long-term plans to promote conservation efforts and plans to transform different types of customers from standard users to active users who engage with conservation efforts over the duration of the WSSP 2050.

Uisce Éireann welcome the statement by CRU, we set out our commitment to Water Conservation under Strategic Objective 1. Uisce Éireann also have an ambition under our sustainability framework to educate 1 million people on the value of water.

Delineation of public and private side Assets

The CRU noted that in providing the dispute resolution service for customers the lack of clarity for customers regarding the delineation between public assets versus private-side pipework. The CRU suggested that further transparency for customers would increase customer trust and understanding, foster positive interactions between customers and Uisce Éireann, and may help to reduce the number of escalated/high profile complaints referred to the CRU's dispute resolution service.

Uisce Éireann are committed to providing further transparency to our customers, we have a section included on our website which sets out who is responsible for which pipes⁴. Uisce Éireann will endeavour to explain this more to customers on an individual basis and via social media.

Engagement on environmental and ecological issues

The Cork Rivers Group recommend that the strategic focus is broadened to consider environmental and ecological issues and opportunities associated with ensuring reliable water supplies and conserving resources. Gleann a' Phuca/Cork River group, commented public education and support for monitoring and protection of water ecosystems, in collaboration with local groups and communities, should be a key priority in this plan.

Uisce Éireann welcome the Cork River Group/Gleann a' Phuca submission. Please refer to response in Action 2.3 under heading Engagement on Environmental and ecological issues

Custodians of water

Gleann a' Phuca, Cork Rivers Group one individual and Green Spaces for Health further noted under Action 2.4, Uisce Éireann is considered the “custodian” of water, but communities are seen as customers. They would recommend a revision of the framing of engagement in this section to highlight the “importance of bidirectional and meaningful partnerships, as local communities and groups may well consider themselves (and be de facto) custodians of, and champions for, water ecosystems and resources, as well as hold local knowledge and expertise”. They recommended a statement in this objective that “reflects a meaningful partnership between Uisce Éireann and groups where the common objectives are the aligned priorities outlined”.

Uisce Éireann welcome the Cork Rivers Groups' comment on Action 2.4 and agree that communities are also the custodians of water, and we have amended the text of the WSSP in line with this.

Community engagement

Green Spaces for Health noted that they are currently mapping the pipes that lead into the Glasheen River in Cork. Collaboration and cooperation in making decisions that impact local rivers and waterways is a fundamental action.” Green Spaces for Health noted that they have experienced “difficulties in communications with Irish Water in the past”. In their submission they recommended “an accessible system of communication that provides meaningful engagement with and between community groups and the water services to

⁴ <https://www.water.ie/help/water-quality/lead-in-drinking-water>.

future proof those services. A sustainable plan for our water should accommodate appropriate access to relevant services”.

Uisce Éireann welcomes Green Spaces for Health ‘s comment on Action 2.4. We set out actions to protect the environment under Strategic Objective 3. Our community education and engagement programme will cover both the protection of water supplies and the protection of the environment. Please see detailed responses to Action 2.2, community engagement and under action 2.3 Community Engagement.

Catchment management to protect water bodies

An individual stakeholder urged for redrafting of strategic objective 2 to demonstrate the ways nature can be restored in our rivers. They also recommended “carrying out full surveys and monitoring urban rivers for micro plastics, heavy metals, chemicals and other pollutants, Mapping, locating all waste pipes entering rivers, Identifying misconnections and sewerage outflows, the sewerage pipes need upgrading to cater for all the additional buildings that were connected to pipes that were never intended to serve so many buildings." A stakeholder suggested that Uisce Éireann work with people on physical items like aerators for taps and water efficient devices. Engineering it out will be the only way some people will comply. They also push for nature-based solutions in towns and cities and nature-based solutions. They also suggested Involve citizen science in building up trust in the drinking water and to use existing education programmes like Green Schools to deliver water education, the success of the DUMp Campaign and welcome further initiatives such as connecting with farmers on chemical use and campaigns such as clean coasts 3Ps.

We plan to take a collaborative approach to management of our sewer networks through the completion of Integrated Urban Wastewater Management Plans as set out in Strategic Objective 3. We set out in action 2.4 that we propose to “enhance peoples’ understanding of the value of water and water services and highlight how everyone can contribute to protecting our water supplies and the environment. “for example, we partner with An Taisce on the Think Before You Flush campaign which is a public awareness campaign about the problems that sanitary products and other items can cause to the plumbing in our homes, neighbour's homes, wastewater network and marine environment when they are flushed down the toilet. Uisce Éireann’s requirements with regards to monitoring of discharges and rivers are set out in our discharge licenses and within legislation, we monitor in line with these requirements. Surveying and identification of misconnections is something that is considered within our drainage area plans and Integrated Urban wastewater Management Plans.

Uisce Éireann discuss nature base solution and water efficiency in detail in our responses under Strategic Objective 1 and 3. Uisce Éireann currently work with clean coasts to deliver the think

before you flush campaign. Uisce Éireann also have pesticide awareness campaigns and works with various stakeholders in drinking water source catchments to manage pesticide use. Collaboration with public agencies and catchment stakeholders is key to protecting and improving our drinking water sources, as mitigation measures may not always be within our control. Uisce Éireann will engage in partnerships to develop and implement catchment management solutions, sharing the responsibility for enhancing the safety and quality of our drinking water. Uisce Éireann actively collaborate a diverse range of stakeholders including landowners, industry groups, agricultural, forestry and environmental sectors, and public agencies to promote source protection and raise awareness of the value of water.

6.3.5 Action 2.6: Engage and collaborate with key stakeholders to support national, regional, and local planning policy.

Summary of Action 2.6 Feedback

The Office of the Planning Regulator (OPR) noted the commitment of Uisce Éireann, under Strategic Objective 2, to work with policymakers, planning authorities and housing and industry stakeholders to support Ireland's economy and the delivery of housing. The OPR would like to acknowledge the positive working relationship that has developed between the Office and Uisce Éireann in the assessment and evaluation of statutory development plans and local area plans. "Uisce Éireann continually demonstrates its awareness of the national and regional planning and development policy framework."

Planning for growth

The Southern Regional Assembly particularly supported Strategic Objective 2 Support our customers, communities and the economy.

They further noted Action 2.6 is of crucial importance to ensure that future investment takes place within the overall policy context set out by the NPF and RSES. The SRA requested that locations that are planned for future growth under these strategies The SRA acknowledged the references to the Regional Spatial and Economic Strategies (RSES) in the Draft WSSP and noted that "strong partnerships will underpin the approach to planning for the future". The SRA also noted that the Plan's strategic objectives would be fundamental to achieve the National Strategic Outcomes of the NPF and the strategic outcomes of the RSES. The SRA highlighted the upcoming review of the NPF needs to be incorporated into the WSSP 2050. The Eastern and Midland Regional Assembly commented that it is essential that the EMRA and Uisce Éireann engage and collaborate over the course of the review of the RSES to ensure compliance with legislation and proper planning and sustainable development. The EMRA supports the co-operation of relevant

stakeholders to work together to continue to raise awareness and increase education in relation to the value of water services. They noted that RPOs such as RPO 7.43, RPO 10.8 and RPO 10.9 support collaboration with Uisce Éireann for growth and strategic development and the examination of raw water sources.

The NWRA recommended “This high-level strategic document should acknowledge and address the legacy of underinvestment in the Northern and Western Region and provide for the delivery of integrated investment priorities, including critical enabling water and wastewater investment of scale by Uisce Éireann.” They requested it as necessary for balanced regional investment in water services to be clearly identified in the relevant strategic Objectives, Aims and Actions. They highlighted water services capacity deficits within the region. They requested provisions in the WSSP for addressing individual and small group water services in small rural settlements by providing adequate water services to these settlements. The IHB and ICI noted that the plan in its current form focuses on prioritising growth areas that have available infrastructure and environmental capacities, but, in tandem with this, they would like to see “infrastructure planned to unlock future development which is undertaken in a targeted manner.”

Uisce Éireann welcomes the comments from the Regional Assemblies, IHB and ICI and acknowledges the importance of collaboration and engagement with stakeholders, especially in relation to national and regional policies like the NPF and the RSES, and Uisce Éireann actively engages with stakeholders to ensure that investment is aligned with targeted growth as much as is possible while still ensuring that we fulfil our environmental, regulatory and other obligations. Uisce Éireann also engages extensively with individual local authorities throughout the development and local area plan making process. Uisce Éireann will support the NPF, which targets more balanced regional growth and development, and its subsidiary plans, subject to technical and funding constraints. Uisce Éireann welcomes coordinated rural settlement investment and works with LA in the delivery, for example, the Small Towns and Villages Growth Programme. Following the implementation of the Water Supply Project, existing water sources will not be made redundant. Uisce Éireann’s investment planning considers all areas served by public water and wastewater networks, urban and rural. As noted in Section 9.1, ‘As the investment needs across the asset base will always exceed the available funding (for the foreseeable future), prioritisation is carried out as part of the investment planning process so as to ensure alignment with the Government’s priorities as set out in the Water Services Policy Statement (WSPS).’ Please refer to detailed response under action 3.1 regarding DPI, Unsewered settlements and rural communities.

In response to NWRA regarding individual and small group water schemes. Uisce Éireann respects that GWSs are community owned, democratically controlled, private supplies with each individual scheme being owned and controlled by its members. Decisions made in relation to

GWSs will have to be made democratically by the schemes' members, and any final decision must be respected. However, Uisce Éireann will accommodate publicly sourced GWSs wishing to transfer ownership to Uisce Éireann. Our demand forecasts include a 'headroom allowance' in our estimation of demand to account for uncertainty in future growth. This includes new demands associated with future connecting GWSs. The 'headroom allowance' provides a buffer in the supply demand balance (SDB) to ensure that the Preferred Approach is sized appropriately to meet future required needs. Our operational and maintenance planning will take account of the associated distribution networks currently being upgraded under the Multi-annual Rural Water Programme (MARWP). The Preferred Approach identified in the regional plans will progress to project level through Uisce Éireann's planning and investment cycles. At the project level stage multi-disciplinary technical impact assessments will be carried out to ensure any proposed pipelines, sources and/ or ancillary works have minimal impact on GWS sources and infrastructure. In response to the EMRA Uisce Éireann supports and encourages collaboration with our stakeholders.

Engagement with planning authorities

Dún Laoghaire Rathdown County Council welcomed the publication of the Draft Water Services Strategic Plan 2050. The Council agreed with the approach of aligning the WSSP 2050 with national and local development plans. Dun Laoghaire Rathdown anticipates significant level of development over the coming years and noted that “Uisce Éireann’s strategic objective of providing safe and reliable drinking water is a prerequisite to allow such development, including housing, to take place.” Tipperary County Council recommended that whilst the need to ensure the protection of the environment is of critical importance, development and growth must be consistent with the policies and objectives of the National Planning Framework (NPF), the relevant Regional Spatial and Economic Strategies (RSES) and County Development Plans (CDP). The identification and development of infrastructure “should follow the relevant Planning Policy Plan. Growth must be plan-led, not infrastructure-led with priority given to investing in growth areas.” Tipperary County Council also noted that “in providing water and wastewater infrastructure in our rural settlements will be critical to implementing the Climate Action Plan, allowing people to reside in agglomerations where efficient public services and public transport can be provided.” Louth County Council commented that the prioritisation of growth areas that already have available infrastructure and environmental capacity in the Draft WSSP will have significant impacts on the availability of Drogheda and Dundalk to meet the population and economic targets set out within the NPF for Regional Growth Centres”.

They cited an example of where a recent planning decision (June 2024) by An Bord Pleanála to refuse permission for a large-scale housing development within the urban area of Dundalk because of the insufficient commitment by Uisce Éireann and appropriate

timescale for the capacity upgrade works to allow access to an effective wastewater treatment system. Louth County Council highlighted the importance of “continued investment in the water services infrastructure in the settlements designated for growth within national and regional and I also raised concerns that growth may be hindered in areas that do not have capacity or which face challenges in terms of capacity in the absence of new or upgrading infrastructure, and this would not be considered to align with national policies. Louth County Council requested that any underlying policy documents or plans of this Draft WSSP 2050 make reference to specific objectives and improvements for Regional Growth centre. Clare County Council stated that a strong commitment must be made in the strategy regarding the provision of sustainable public wastewater infrastructure solutions to support the growth of rural settlements.

They suggested Uisce Éireann must have a role in the delivery of developer led/provided infrastructure, to ensure the necessary standards and management are ensured. They also suggested the action needs further support through more focused actions to manage the availability of capacity to support housing and the economy in line with national policy. The council noted that under the aims and actions under Strategic Objective 2, the provision of adequate and reliable wastewater treatment capacity through maintenance, upgrading and provision is essential to accommodate future development requirements. Clare County Council also noted that there continues to be several service and compliance issues in existing wastewater systems, some of which are “being addressed under Uisce Éireann’s 2020-2024 Programme of Investment.

The draft WSSP 2050 outlines our strategic direction to deliver water services at a national level. Uisce Éireann have aligned with the National Planning Framework (NPF), as appropriate, and considered updates during drafting. Uisce Éireann follows a plan led approach and engages extensively with all local authorities throughout the development plan and local area plan making processes to ensure that national, regional and county level planning policy is taken into account in investment in growth.

Uisce Éireann have to work within the confines of its budget set by the Department and the CRU. We carry out prioritisation as part of the investment planning process with the aim of ensuring alignment with the priorities of the Government as set out in the Water Services Policy Statement. Providing for growth is a key factor in those decisions Uisce Éireann also supports the development of rural communities through programmes like the Small Towns and Villages Growth Programme, among others. Refer also to response above under heading planning for growth.

Collaboration with stakeholders

Irish Home Builders and Construction Industry Federation requested this section requires further focus. “Stakeholders should be identified, with targeted meetings and plans put in place to aid this increased headroom”. Enterprise Ireland requested enhanced coordination between the EPA and Uisce Éireann to provide for a clear and timely process for businesses to obtain licences for wastewater discharge.

The Water Services Strategic Plan is a high-level tier one plan and does not contain this level of detail. However, Uisce Éireann are committed to building on our current engagement and collaboration with all stakeholders including the EPA as set out in the WSSP and will continue to consult, liaise and work with these stakeholders to improve processes. Through working collaboratively with key stakeholders, we believe that we can deliver outcomes for Ireland more effectively, efficiently and faster than if we were working in isolation.

Standardised asset data

Clare County Council requested that Specific actions are needed within the Water Services Strategic Plan to address the disconnect between what is evidenced from Annual Environmental Reports, EPA Licence Reviews, and inspection reports to what is provided through a Confirmation of Feasibility Letter.

Uisce Éireann recognises that accurate and robust data is a key component of any modern utility. We provide the best available data at an appropriate level for the ask, and at a point in time. Since inception, Uisce Éireann has worked to improve ways of working and streamline systems and processes to deliver consistent and accurate data. During RC4, Uisce Éireann will continue to invest in data improvement initiatives such as Invest to Outcome Digital and will develop a Data Competency Programme.

Water Supply Project

Ibec encouraged the agile planning approach and collaborative data analysis which Uisce Éireann advocates for to be adopted widely to ensure the adequacy of the regional supply capacity in the longer term. The provision and capacity of water and other utilities plays a critical role in residential and commercial. Ibec also noted that for new and existing customers in the Greater Dublin Area (GDA), there is the prospect of supply increasingly failing to meet the growing demand for homes and businesses. They commented that recently enacted water abstraction legislation may pose challenges even for meeting current demand Ibec also stated that the Government decision to allow Uisce Éireann to commence work on planning consent for the Shannon Water Supply Project Water Supply Project, Eastern and Midlands Region (WSP) will serve to alleviate these pressures. Ibec emphasised that continued backing will be required to this enabling infrastructure is in place to support “sustainable growth across the economy and society”, as “delayed delivery

will threaten the country's ability to meet our housing targets and could have adverse impacts on our ability to secure and grow inward investment."

Uisce Éireann welcomes Ibec's support of the Water Supply Project which is critically important to sustaining growth across the economy for the Region.

6.3.6 Action 2.7: Engage with housing and industry stakeholders to support delivery of new homes and economic growth

Summary of Action 2.7 Feedback

Engagement with housing and industry stakeholders

Irish Home Builder and Construction Industry Federation commented that whilst Action 2.7 commits to engagement with housing and industry stakeholders, as well as referencing plan-led development targeted, outcomes should also be included here. They suggested reviewing this every six months and engaging with housebuilders and planners to identify key future projects that can be prioritised from an investment perspective to unlock all development types. Furthermore, they suggested Uisce Éireann share capacity data to support information on available serviced zoned lands.

Uisce Éireann welcome the comment by Irish Home Builder and Construction Industry Federation on Action 2.7. Uisce Éireann does meet with the planners in each Local Authority. We follow a plan-led growth approach through engagement with planning authorities in the development of statutory plans such as Regional Spatial Economic Strategies, City and County Development Plans and Local Area Plans. Our participation in the statutory planning processes through consultation on county, regional and strategic plans, allows us to determine key areas for investment in the medium to long term to support the delivery of new homes and economic growth. The draft WSSP 2050 outlines our strategic direction to deliver water services at a national level. We have aligned with the National Planning Framework (NPF), as appropriate, and considered updates during drafting. The NPF and Regional plan and local level plans also inform our tier 2 or tier 3 implementation plans, such as the National Water Resources Plan. Our supporting processes include engagement with the Department of Housing, Local Government and Heritage regarding capacity for new housing developments. Our Strategic Aim on "Providing for growth" is supported by Action 2.6 to "Engage and collaborate with key stakeholders to support national, regional and local planning policy". Uisce Éireann produce capacity registers annually to provide an indication of the available water and wastewater treatment capacity to assist planning authorities in their forward planning activities.

Foreign Direct Investment

IDA Ireland outlined that “the availability of strategic land banks with advanced provisioning of utilities is a key requirement by investors when evaluating potential locations for investment. IDA Ireland highlighted the requirement for on-site wastewater treatment as a challenge in circumstances where the cost of investing in on-site treatment was not factored into the assessment of total costs at the time of investment decisions. IDA Ireland commented that the WSSP should seek to highlight how Uisce Éireann can compete internationally for FDI. IDA is supportive of investment that can deliver services to standards expected by multinational companies locating in Ireland, that are comparable with our competitors for FDI projects". A stakeholder suggested that Uisce Éireann does not provide sufficient support to the FDI sector.

Uisce Éireann acknowledges the IDA's submission on the WSSP and welcome their views in relation to FDI and the provision of high quality water services. Uisce Éireann works closely with the IDA in the area of water services provision for prospective industries seeking to establish operations in Ireland. Both Uisce Éireann and IDA are currently sharing plans to understand ways in which we can work together to further deliver essential water services for FDI.

Uisce Éireann within highly regulate structures and is required to follow CRU policies in relation to the provision of water services to the non-domestic sector. Uisce Éireann provides support to the FDI sector and a focused on maintaining safe and reliable water and wastewater services to all existing customers including FDI customer. As for all customer today, this is based on first come first serve basis and we follow plan-led growth approach for our domestic and non-domestic customer. The Connecting Charging policy will be applied by Uisce Éireann consistently to all Customers seeking Connection to the Network and will not have any regional or local variations. This will ensure equity and non-discrimination in the provision of a standard, transparent Connection charging regime for Irish Water's customers. Under the policy, customers will contribute to the cost of providing their Connection, including a contribution to the cost of providing Network Infrastructure to facilitate the Connection.

Stakeholder engagement

The CRU recognised the growing demand for both domestic and non-domestic water and wastewater services. They recommended that Uisce Éireann continue to engage with and further develop closer collaboration with its environmental regulator, the Environmental Protection Agency, and the planning board, An Bord Pleanála, to ensure the delivery of capital programmes that can meet the future needs of the economy, and customers. The CRU welcomed Uisce Éireann's commitment to working closely with developers and other stakeholders to streamline processes. The EPA highlighted that the section of how Uisce

Éireann will collaborate with key stakeholders needs to have greater emphasis on how water services is a cornerstone of housing development and needs significant sustainable investment into the future.

Our commitment to engaging with stakeholders and customers is set out in WSSP 2050, Collaboration is also included as a key enabler to our WSSP. Uisce Éireann is committed to playing its part in the national drive to provide homes to people who need them, through providing a safe and secure supply of water and wastewater treatment across Ireland that will ensure quality of service for years to come is our priority. We must also prioritise the timely delivery of connections. Uisce Éireann is an enabler to housing and a dedicated team has been put in place to support developers and to improve customer timelines.

Uisce Éireann plays a central role in meeting the housing supply challenge and feeds directly into the Government's Housing for All Plan, working in partnership with Local Authorities and Developments to play our part. Our Connections Charing policy was approved by the CRU post their 10-week consultation and went live on the 1st of April 2019. The Policy is based on establishing Standard Connection Parameters and Standard Connection Charges for the majority of Connections. Some Connections may inevitably have additional Quotable Charge elements, dependent on Customer specific load or volume requirements, site specific factors and distance from the Network. Any customer that are changed a quotable changes element is based on the additional scope needed to provide a least cost design solution and is based on Contractors Rates which were tendered under the Utilities Frameworks procurement rules.

To manage our operational licencing requirement and CIP investment we engage with the Environmental Protection Agency, and the planning board, An Bord Pleanála, to ensure the delivery of capital programmes that can meet the future needs of the economy, and customers.

6.3.7 Action 2.8: Develop demand analysis capability to inform, forecast and plan for future investment requirements

Summary of Action 2.8 Feedback

Population forecast

The Southern Regional Assembly noted it as crucial that population forecasts are based on the policy context of the NPF, RSES and Development Plans to ensure that investment happens where it is planned. The SRA cited the Report of Expert Group for the First Revision of the National Planning Framework (August 2023) that highlighted the importance of regional balance and clustered and compact development and infrastructural investments, and that this alignment requires a much greater commitment

to joined up policy making and a follow through by all Departments and Agencies. Gaia Ecotecture recommended that Uisce Éireann reflect actual population growth in your planned improvements to plants.

Uisce Éireann welcomes the comments from the SRA and acknowledges the importance of national and regional policies like the NPF and the RSES. Uisce Éireann reviews the NPF, RSESs and all Development Plans as they are published to ensure that Uisce Éireann is fully cognisant of the planning policy, population targets and employment targets therein. These are key inputs into our strategic plans and investment along with other drivers such as compliance and sustainability. We produce capacity registers annually to provide an indication of the available water and wastewater treatment capacity to assist planning authorities in their forward planning activities.

Future projections of demand growth

CRU queried how Uisce Éireann has accounted for future projections of demand growth for its domestic and non-domestic customers. They further queried what is the source of the growth projections that have been used to forecast future water demand, particularly for the Dublin region and whether Uisce Éireann is “confident that its draft WSSP puts the utility on a path to addressing future demand requirement scenarios”. An Forum Uisce recommended that “the most up to date data and models are used in terms of population growth projections for futures thinking and adaptive planning, particularly when it comes to water efficiency, energy targets and increased economic and housing demands”. Another stakeholder commented that the improvements need to be scaled to increasing population and realistic forecasts.

There are 3 different growth rates applied to the population in the GDA WRZ in the NWRP. Through consultation of NPF, RSES, ESRI and CDPs a growth rate of 30.8% up to 2044 was applied to Dublin City extent of the WRZ, 29.1% up to 2044 was applied to the key towns in the WRZ and 17.5% up to 2044 applied to the rural extent of the WRZ. The Dublin city comprises 70.8% of the WRZ, the key towns represent 15.7% of the WRZ and the rural area is 13.6% of the WRZ. A similar process is applied when calculating growth rates for the rest of the country, considering the NPF, RSES, ESRI, CDPs and LAPs. We produce capacity registers annually to provide an indication of the available water and wastewater treatment capacity to assist planning authorities in their forward planning activities.*

Future demand

Enterprise Ireland highlighted that long-term sufficient water services must be provided at a sufficient capacity to meet future demand and investment opportunities and due consideration to the needs of the enterprise sector.

We note the statement by Enterprise Ireland on Action 2.8. We carry out prioritisation as part of the investment planning process with the aim of ensuring alignment with the priorities of the Government as set out in the Water Services Policy Statement. Non domestic growth is a factor in those decisions.

Capacity Register

Tipperary County Council welcomed the publication of Uisce Éireann's capacity register with respect to its infrastructure within the County and would welcome consultation in advance of publication. Furthermore, they suggested an assessment of the projected future capacity demands of water and wastewater infrastructure should be undertaken in consultation with Local Authorities and form an action within the strategic plan. "Clear measures must be set out as to how deficiencies would be addressed with timescales for same particularly as it relates to Key and District Towns."

The Water Services Strategic Plan 2050 is a high-level document and does not include this level of detail. Uisce Éireann can confirm that in estimating growth projections to inform projects Uisce Éireann consider the National Planning Framework, Regional growth Rates, ERSi and County Development Plan targets and then add strategic reserve.

6.3.8 Conclusions on Strategic Objective 2

Having carefully reviewed the submissions received on Strategic Objective 2 Uisce Éireann have considered the following clarification should be provided in the WSSP 2050.

Clarification on Strategic Objective 2

Section 5.3, Action 2.4 - In response to the submission from a member of the Cork Rivers Group, we have amended the text in Action 2.4 to highlight that communities are also custodians of water. In response to stakeholder submissions regarding the need to ensure balanced regional growth, we have amended the text in Action 2.6 to emphasise our support for the National Planning Framework, which targets more balanced regional growth. We also highlight our commitment to work with local authorities to deliver programmes in the longer term like the Small Towns and Villages Growth Programme.

6.4 Strategic Objective 3 Protect and Restore our Environment

In this chapter, we summarise the key references in submissions to issues under Strategic Objective 3. Within the overall heading of Strategic Objective 3 there were 78 references. We have further categorised submissions to the actions as identified in the draft WSSP 2050. We deal with each of the actions in this chapter, setting out first a summary of the relevant references in the submissions, followed by our response.

In our response survey, several stakeholders welcomed Strategic Objective 3 and noted it as important in particular monitoring, reporting and enforcement. Stakeholders including; Bord Iascaigh Mhara, An Taisce, EPA, Inland Fisheries Ireland, and LAWPRO all welcomed the aims and actions under Strategic Objective 3.

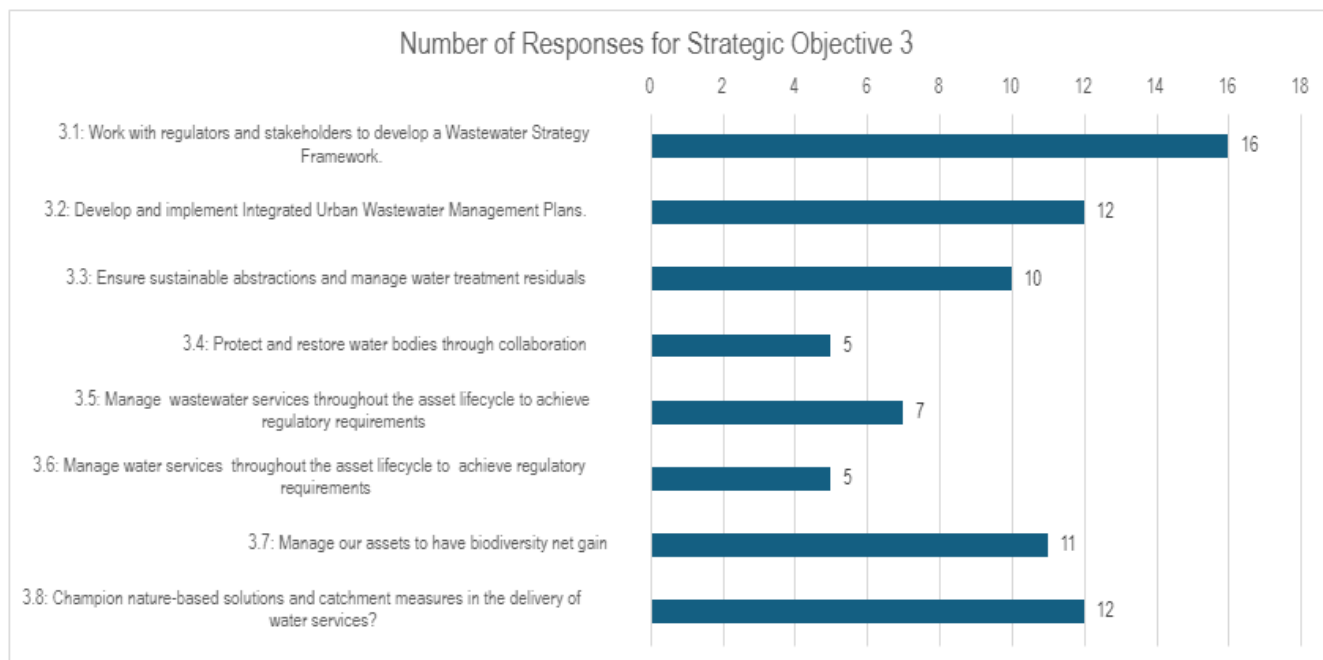


Figure 11 Number of Responses for Strategic Objective 3

6.4.1 Action 3.1: Work with regulators and stakeholders to develop a Wastewater Strategy Framework

Summary of Action 3.1 Feedback

The EMRA advise that the regions priorities of ensuring that the water supply and wastewater needs are met by new national projects for the Region support this action. They also highlight that this action is critical to achieving and maintaining good environmental status of marine waters in the region.

Separate sewers

Tipperary County Council requested that the WSSP commits to developing a programme of upgrading wastewater infrastructure and networks, facilitating the segregation of wastewater and stormwater, to prevent flooding on combined systems.

Action 3.1. The wastewater strategy framework will include plans to continue upgrading wastewater networks and facilitating separation of stormwater entering the combined system in line with requirements under the recast UWWTD for Integrated Urban Wastewater Management Plans which is also an action in the WSSP.

Developer provided infrastructure / Unsewered towns / Rural settlements

Tipperary County Council also requested that the Plan commits to developing a road map for the provision and management of wastewater services infrastructure in settlements where Uisce Éireann does not have infrastructure currently. "This includes Developer Provided Infrastructure (DPI) and unsewered towns." The Council committed to working collaboratively "with Uisce Éireann to ensure the efficient and effective transition of DPIs to Uisce Éireann in line with Department of Housing, Local Government and Heritage correspondence of 18th April 2024." LAWPRO highlighted that a road map is required for the provision and management of wastewater services infrastructure where Uisce Éireann does not have any infrastructure currently including DPI. Some stakeholders noted the lack of wastewater management services in villages and rural areas. One stakeholder recommended the "upgrading of rural wastewater treatment facilities will improve and protect the environment and will have a much more positive impact than small upgrades at larger facilities."

Uisce Éireann have not specifically called out DPI within the Water Services Strategic Plan. Until recently, DPI came under the remit of the Planning Authorities with some initial resolution programmes advanced by the Rural Water section in the Department of Housing, Local Government and Heritage. However, from the beginning of 2024, the Department assigned responsibility for the remediation of Developer Provided Infrastructure (DPI) nationally to Uisce Éireann. A cross-sectoral Steering Group has been established, led by the Department and involving Uisce Éireann and representatives from Local Authorities to give effect to the decision made and to scope out a remediation programme. Funding has not yet been allocated for a DPI Remediation Programme. One of the items to be addressed by the DPI Steering Group will be to determine long-term sustainable solutions for different categories of DPI. Given the scale and complexity involved with some of the DPI across the country, it is acknowledged that it will take some time to resolve all of them, and that a range of resolution options are likely to be needed.

Settlements which do not currently have public wastewater infrastructure do not fall within the remit of Uisce Éireann. However, the wastewater collection and treatment needs of a selected number of rural settlements and villages not currently serviced by Uisce Éireann is being addressed through Measure A8 of the Multi-Annual Rural Water Programme 2022-2025. Funding for Measure A8 has been committed under Project Ireland 2040 – National Development Plan 2021-2030. The Department of Housing, Local Government and Heritage has approved funding of up to 85% of the bid submission project cost with the Local Authority contributing the balance of the final project cost. Uisce Éireann will work with the DHLGH and the LAs, through our new connections process, to support the development and implementation of appropriate wastewater treatment solutions for these settlements under the Measure A8 programme.

Uisce Éireann's investment planning considers all areas served by public water and wastewater networks, urban and rural. As noted in Section 9.1, 'As the investment needs across the asset base will always exceed the available funding (for the foreseeable future), prioritisation is carried out as part of the investment planning process so as to ensure alignment with the Government's priorities as set out in the Water Services Policy Statement (WSPS).'

Micropollutants

Inland Fisheries Ireland requested that “Uisce Éireann’s Wastewater Strategy Framework includes the treatment of micro-pollutants and emerging pollutants, such as microplastics, PFAS etc. Currently standards exist for some of these for drinking water provision (i.e., European Union (Drinking Water) Regulations 2023, SI 99 of 2023), but not for wastewater discharges or for sludge sent for landspreading.” Inland Fisheries Ireland also requested that parameter limits are set to prevent the release of these pollutants into the environment. Ibec also discussed the impact on pharmaceuticals and cosmetics sectors from “the establishment of a new Extended Producer Responsibility Scheme to help fund Quaternary Treatment for removal of certain organic micropollutants from Uisce Éireann’s larger wastewater facilities”. They noted that “these actors will wish to be involved in the design, and possibly the administration, of any such scheme.

The Wastewater Strategy framework will be developed to consider the recast UWWTD which includes requirements for quaternary treatment to remove micropollutants, increased monitoring for microplastics and a wide range of chemicals including PFAS. The DHLGH is lead for establishing EPR scheme and Uisce Éireann is willing to work with industry in collaborative working structures set up by the Department.

Major project delivery

Ibec noted ongoing engagement with housing and industry bodies as essential to ensure adequate water supply and wastewater treatment capacity. In particular, Ibec stated that “The Greater Dublin Drainage Project (GDDP) is urgently needed for the many reasons outlined in Ibec’s recent submission to the An Bord Pleanála Statutory Consultation on the project.” They also outlined that other major investments will be necessary over the period to 2030 to comply with the recast Urban Wastewater Treatment Directive and to address pressures on receiving water bodies. The Irish Academy of Engineering consideration that investment in water networks and treatment plants, including the Water Supply Project and Greater Dublin Drainage projects are essential to meet national needs especially in light of intense weather patterns and increased incidences of overflow.

Our commitment to engaging with housing and industry bodies to provide for housing and economic growth is set out under Action 2.7. Uisce Éireann note and agree with the statement by the Ibec on Action 3.1. UÉ set out under Strategic Aim 14 the actions we will take to secure long-term funding including Action 4.9 Quantify and articulate long-term investment needs for our water and wastewater assets, this will include consideration of water main and sewer replacement needs while in Action 4.10 we set out the need to Secure a multi-annual funding approach. Both the Water Supply Project and the Greater Dublin Drainage Project are included in Uisce Éireann’s Draft Capital Investment Plan 2025-2029.

National and regional approach to wastewater management

The CRU requested that Uisce Éireann “develop a national and regional approach to wastewater and drainage across wider catchments which would be beneficial for planning and delivering programmes that protect water quality and communities from flooding”. The CRU also requested that Uisce Éireann take a holistic approach to reviewing the NWRP, the new Integrated Urban Wastewater Management Plans, and any future national or regional plans for wastewater and drainage. The objective of these reviews would be “to consider the interdependencies within the water sectors and to determine investment priorities and identify service gaps”. They note that this aligns with Uisce Éireann’s systems thinking approach.

Uisce Éireann welcome the statement by the CRU on Action 3.1. Integrated Urban Wastewater Management Plans are a requirement of the proposed recast of the UWWTD. These plans include a requirement for planning for the reduction of pollution discharge and impact for both wastewater and urban runoff (surface water) drainage systems. Working groups to assess the impact of the rUWWTD and develop plans for its implementation will be progressing over the coming months under the direction of the DHLGH. Uisce Éireann has responsibility for

wastewater systems whereas responsibility for surface water systems in urban areas lies with Local Authorities. In order to develop an approach for integrated drainage planning involving multiple agencies, Uisce Éireann will be reviewing the approaches taken in other countries across Europe. Uisce Éireann will take a systems thinking approach to developing and reviewing our plans and look at the interactions and potential co benefits of the provision of water and wastewater services. For example, we are already an active collaborator with other agencies with drainage responsibilities regarding the progression of nature based sustainable urban drainage solutions (NbS/SuDS). Uisce Éireann collaborated on guidance published in May 2024 which helps to advise relevant bodies design for rainwater management and to encourage nature-based solutions. gov - Rainwater Management Plans - Guidance for Local⁵ Authorities ([www.gov.ie](https://www.gov.ie/en/publication/d9a24-nature-based-management-of-urban-rainwater-and-urban-surface-water-discharges-a-national-strategy/)) and gov - Nature Based Management of Urban Rainwater and Urban Surface Water Discharges - A National Strategy ().

Wastewater compliance

The EPA noted that over half (58%) of all licensed treatment plants do not meet the standards set in EPA licenses. They stated UÉ must achieve compliance with wastewater authorisations at the earliest opportunity and inclusion in the WSSP to reflect this. The EPA also stated that this section would benefit from a clear commitment to comply with their Wastewater Discharge Licences and the new recast Urban Wastewater Treatment Directive. They highlighted a key driver for protecting and restoring the environment should be the elimination of wastewater treatment plants from the EPA's Priority Area List (PAL) and this should also be referenced in this section." They also recommended that the language used should be stronger and more directed towards UÉ themselves in developing a Wastewater Strategy Framework, with input from external stakeholders."

Uisce Éireann welcome the statement by the EPA on Action 3.1. Uisce Éireann is committed to progressively improving compliance with WWDAs and we have included text to convey this and have enhance our text to further convey this. We have included reference to the EPA's Priority Action list in Action 3.5 and strengthened language within the WSSP which demonstrates our commitment to waste water compliance.

Significant pressures & Water Framework Directive objectives

LAWPRO highlighted that the plan outlines the good work done to reduce the number of water bodies where urban wastewater is a significant pressure. However, they requested that the plan to "commit to prioritizing wastewater treatment plants identified as significant

⁵ <https://www.gov.ie/en/publication/d9a24-nature-based-management-of-urban-rainwater-and-urban-surface-water-discharges-a-national-strategy/>
<https://www.gov.ie/en/publication/93f67-rainwater-management-plans-guidance-for-local-authorities/>

pressures in Uisce Éireann Capital Investment Plans. Swan requested a strengthening of wording regarding the Wastewater Strategy framework aim, highlighting that Uisce Éireann must do everything necessary to meeting WFD objectives, including measures beyond meeting compliance with Wastewater Discharge Authorisations.

Environmental compliance, including removing sites from the PAL , resolving issues where UE's assets are significant pressures on water bodies and progressively improving compliance with WWDAs, is prioritised in UE's capital investment planning process but will take several investment cycles to fully resolve. Requirements are set within waste water discharge authorisations to facilitate water body achieving WFD objectives, For example, in assessing what Emission Limit Values in waste water authorisations are appropriate Uisce Éireann takes consideration of surface water quality objectives which are needed to facilitate the waterbodies achieving its WFD objectives and proposes ELVs accordingly to the EPA in licence applications and licence review applications. There are many other pressures impacting on WFD objectives - Uisce Éireann mitigate our activities via, inter alia, the WWDA.

Shellfish waters

Bord Iascaigh Mhara (BIM) welcomed Uisce Éireann's approach to engaging with key stakeholders and requested direct consultation with aquaculture operators and fishers as part of that engagement. They commented that "these stakeholders are dependent on the water and coastal zones for their livelihood's and are reliant on good water quality and are the first to experience problems". Their submission noted more could be done to communicate issues and strengthen monitoring and compliance with licences following on from concerns raised at ROC level".

Uisce Éireann welcome the statement by Bord Iascaigh Mhara (BIM) on Action 3.1. UÉ engages directly with a broad range of stakeholders including those bodies representing the aquaculture industry in a variety of forums including those where individual operators are represented. For a detailed response see response under heading designated shellfish water in section 6.1.4 Environment and Biodiversity Crises

Publicly available information

Cork Rivers Group highlighted "It would be important to make more accessible to the public information about the modelling used to monitor river catchments, with regards to what is measured, and the criteria based on which decisions on wastewater are made."

All supporting documentation to WWDA applications, of which modelling is a key part, are publicly available through the EPA WWDA portal. Please also see the Capital-Investment-Plan-

2020-2024-Explanatory-Booklet.pdf (water.ie)⁶ on our website which contains info on project stages

Discharges to sewer

A stakeholder recommended working with industry for a holistic view on wastewater/pollution management to actually restore the Irish Waterways.

Uisce Éireann engages with Industries as part of licensing and compliance activities in our role as a water services authority. Trade effluent discharges vary in their nature, composition, and volume depending on the industry. There is also varying capacity in our sewers and wastewater treatment plants. This means Uisce Éireann must carefully assess and regulate all trade discharges to our sewer network to ensure that public health, our operations, assets and the environment are fully protected. As part of our engagement with Industry on both licensing and compliance issues, Uisce Éireann always seeks to get a good understanding of the customer needs and endeavours to service those needs while maintaining our own environmental and regulatory obligations. We recognise the need to work collaboratively with Industry to support licensing and compliance solutions that benefit both Uisce Éireann and Industrial Customers

Bathing waters

A stakeholder highlighted a concern about “untreated wastewater entering our rivers and beaches on the West and North Coasts of Clare. This has resulted in beaches being closed and individuals becoming ill from recreational activities in our coastal waters.

Uisce Éireann is committed to progressively improving compliance with WWDAs including protecting bathing waters.

6.4.2 Action 3.2: Develop and implement Integrated Urban Wastewater Management Plans

Summary of Action 3.2 Feedback

Nature-based solutions

The Southern Regional Assembly welcomed the approach of promoting the role of nature-based solutions within the Draft WSSP, an area that the SRA has engaged in as part of the Interreg Europe Blue Green Cities project and made particular reference to Action 1.3, Action 3.2 and Action 3.8. They further stated that this “needs to continue to be a priority action for future Uisce Éireann plans and projects”. Inland Fisheries Ireland supported

⁶ <https://www.water.ie/sites/default/files/projects/strategic-plans/capital-investment-plan/Capital-Investment-Plan-2020-2024-Explanatory-Booklet.pdf>

Action 3.2 “particularly for the co-benefits which can be achieved through biodiversity enhancement, and the mitigation of hydraulic loads on combined sewer and storm systems through Nature Based Solutions (NBS) as well as mitigating untreated run-off from impermeable surfaces in urban areas.” LAWPRO suggested maximizing the incorporation of nature-based solutions at planning stage in dealing with and diverting excess rainwater from collection systems and reducing pollution due to rainwater.

Uisce Éireann believe that the Nature Based Solutions that include provision for the treatment and attenuation of urban runoff will greatly improve urban drainage performance and help towards improving water quality and reducing flooding risk.

Bathing waters

The Irish Academy of Engineering submission highlighted the increase in open water swimming and the critical attention on CSO's and SO's. They highlighted the lack of understanding of sources of pollution after periods of rainfall. They requested additional investment in the separation of drainage networks by Local Authorities to relieve localised flooding and surcharge is required to mitigate this risk.

Uisce Éireann welcome the feedback from the Irish Academy of Engineering. The proposed recast Urban Wastewater Treatment Directive will require Local Authorities and Uisce Éireann to work together to develop Integrated Urban Wastewater Management Plans and assess and mitigate against the negative impacts of both urban runoff and Storm Water Overflows on people and the environment including bathing waters.

Sustainable urban drainage & misconnections

Tramore Community Rivers Group welcomed the reference to “plans to address the combined sewer system and the problem with pollution from Storm Drain runoff and industry which is a significant problem in The Tramore River and in many urban rivers in Cork.” They highlighted that storm run-off management should be addressed as a matter of urgency. They also highlighted initiatives by the Cork rivers group, Douglas tidy town and Dublin urban river life projects regarding misconnections. Corks river group and Gleann na Phuca also highlighted the importance of locating pipes and identifying misconnections.

Uisce Éireann welcome the statement by Tramore Community Rivers Group. The proposed recast Urban Wastewater Treatment Directive will require Local Authorities and Uisce Éireann to work together to develop Integrated Urban Wastewater Management Plans and to assess and mitigate against the negative impacts of both urban runoff and Storm Water Overflows. Uisce Éireann is

an active collaborator with other agencies with drainage responsibilities regarding the progression of nature based sustainable urban drainage solutions (NBS/SuDS). Please refer to guidance published in May 2024 to help advise relevant bodies design for rainwater management and to encourage nature-based solutions gov - Rainwater Management Plans - Guidance for Local Authorities (www.gov.ie) and gov - Nature Based Management of Urban Rainwater and Urban Surface Water Discharges - A National Strategy (www.gov.ie).⁷

As the storm sewer networks are the responsibility of the local authorities, it is therefore the responsibility of the local authorities to identify and resolve foul misconnections to the storm sewer networks. Such foul misconnections contribute to urban runoff pollution to receiving water bodies and so these must be addressed in the Integrated Urban Wastewater Management Plans which will have to be developed collaboratively by UÉ and the relevant local authorities. We propose to develop strategic partnership working with local authorities to deliver these plans in the coming years as set out in Action 3.2 of the WSSP.

Significant pressures

LAWPRO stated that urban wastewater is a significant pressure which can be reduced or eliminated over time from a water quality perspective. LAWPRO indicated that “references to the impact of urban wastewater were limited within the plan compared to previous plans. LAWPRO would like to see greater emphasis and detail on the impacts of Urban wastewater in the plan and ideally specific targets outlined or referenced. LAWPRO highlighted a lack of progress in areas listed in the EPA Urban Wastewater Report 2022. LAWPRO also requested that the impact of stormwater overflows on marine and freshwater resources is assessed and resolved, in particular bathing areas and shellfish production areas.

Urban wastewater is the fourth 'most common' pressure on water bodies, after agriculture, hydromorphology and forestry. The number of water bodies impacted by Urban wastewater has dropped by about a third since the start of the second cycle, by far the most of any sector. Uisce Éireann are committed to continuing this trend. UÉ highlight the impact of wastewater discharges in our key challenges section of the report. Environmental compliance, including removing sites from the PAL, resolving issues where UE's assets are significant pressures on water bodies and progressively improving compliance with WWDAs, is prioritised in UE's capital investment planning process but will take several investment cycles. UÉ have strengthened the text in the WSSP to demonstrate our commitment in this regard. SWOs referenced in our Wastewater Discharge Authorisation are to be surveyed and assessed on a prioritised basis. Provision of event duration monitors of the stormwater overflows is being prioritised to

⁷ <https://www.gov.ie/en/publication/d9a24-nature-based-management-of-urban-rainwater-and-urban-surface-water-discharges-a-national-strategy/>

understand the frequency of activation (spills); Shellfish and Bathing Waters being examples of high priority areas to be monitored.

Information on storm water overflows

Lawpro suggested improvements on the information available on storm water overflows and the findings from these projects to identify and address environmental risks and guide investment planning.

The proposed recast UWWTD requires that Member States shall ensure that adequate, easily accessible, and up-to-date information on urban wastewater collection and treatment will be made available to the public online including some details of the discharges from Storm Water Overflows in larger agglomerations. Further information on these details and the format and timing of the information may follow in subsequent implementation acts. UÉ will be reviewing this matter with all relevant stakeholders as part of the forthcoming work on implementation of the impact of the rUWWTD.

Waste Water Strategy Framework

Ibec welcomed the establishment of Integrated Urban Wastewater Management Plans to help to alleviate “pressure on existing treatment plants and could also help to mitigate the risk of storm water overflows.” In addition, they would welcome “Cooperation between UÉ and regulatory authorities on a national Wastewater treatment strategy Framework. This would be a Tier 2 strategy that coordinates the approach to IUWMPs where UÉ would actively seek the views of business authorities on a National Wastewater Treatment Strategy Framework as it previously did when developing the National Water Resources Plan.”

Uisce Éireann welcomes Ibec's statements statement. As set out in Action 3.1 we have proposed development of a Tier 2 Wastewater Strategy Framework . UÉ would propose to engage with stakeholders in the development of this plan.

Network resilience

The CRU believed the sub theme ‘developing network resilience’ would benefit from a greater focus on the wastewater and flooding aspect alongside the already mentioned ‘security of supply’. “This is because future weather events may cause droughts which impact the water supplies but can also cause flooding from the wastewater and drainage network, as the combined sewers can be overwhelmed by extreme rainfall events.” Another stakeholder highlighted “resilience in wastewater networks to take account of climate change in particular flood events.” A number of stakeholders also remarked that

the network does not have capacity for sewerage outputs and that sewerage pipes need to be upgraded, enlarged and diverted.

Uisce Éireann as part of its drainage area planning process has built hydraulic models of all our main urban areas and has used these models to understand the risk of flooding for a number of epochs including current, short-term and longer-term development scenarios for a number of storm events that include best practice rainfall allowances for climate change. In addition, Uisce Éireann has a developed process for recording and investigating actual flooding events and this is used to compare and update the models. All modeling of Uisce Éireann discharges is included in our license submissions to EPA and are publicly available on their website.

Monitoring

One individual, the Cork Rivers Group and Gleann a'Phuca requested that a commitment should be clear in the plan with regards carrying out a full survey and monitoring of urban rivers for pollutants including microplastics, heavy metals, microbes (e.g., E.coli), and chemicals

*Uisce Éireann monitors its discharges, and ambient monitoring points up and downstream of our discharges. The information is publicly available in our annual environmental reports for each agglomeration. Apart from this, the EPA and local authorities have primary responsibility for monitoring water quality in rivers and this data is generally publicly available via [Catchments.ie](https://www.catchments.ie) - Water, from source to sea.*⁸

Domestic wastewater inspections

One stakeholder looked for Implementing a system for funding domestic wastewater inspections and proper regulation of domestic wastewater management.

Domestic wastewater inspections are the responsibility of local authorities and are not within Uisce Éireann's remit.

⁸ <https://www.catchments.ie/>

6.4.3 Action 3.3: Ensure sustainable abstractions and water treatment plant residuals

Summary of Action 3.3 Feedback

Water treatment plant residuals

Clare County Council welcomed the reference in the strategy to the completion of a risk assessment of discharges of water treatment plant residuals as part of Uisce Éireann's Water Treatment Plant (WTP) Residuals Strategy. They suggested that Uisce Éireann should review current methods of handling and disposal of water treatment sludge. They noted that "discharge of water treatment sludge to receiving waters, where practised, should cease as a matter of urgency and leachate from stored drinking water sludge should not give risk to environmental pollution". Inland Fisheries Ireland suggested that operational discharge of Drinking Water Treatment Plants residuals should be licensed and monitored by the EPA. An Taisce commented that the recognition of Water Treatment Plant residuals as a pressure to water quality which is additional to urban wastewater is omitted from the WSSP.

Uisce Éireann note and welcome Clare County Council submission and support for the completion of a risk assessment of water treatment plant residuals. This will include the management of water treatment sludge and potential leachate. In relation to regulation of discharges, the EPA are better placed to consider this response in their role as the regulator. Uisce Éireann is aware of legacy issues associated with WTP residuals. Assessments of UE's residual producing WTPs are currently being undertaken to determine the potential risk of residual discharges to receiving water bodies, with a view of informing monitoring to verify risk and inform interventions.

Discharges from water treatment plants

IFI commented that "operational discharges from DWTP of chemicals such as aluminium sulphate require additional regulatory oversight to monitor their impact. IFI recommended that DWTP risk assessments include assessments of management of storage and transfer of chemicals at all sites and that annual reports are published with respect to their outcomes." Other stakeholders requested more control of effluent and the prevention of run off and legal contamination. The EPA commented that "the WSSP does not deal with the potential risk to the environment at water treatment plants, from issues such as drinking water sludge management and chemical handling and storage. LAWPRO noted that Uisce Éireann must ensure adequate management and control of hazardous substances/materials on site that these are risk assessed within the footprint of the facility.

They suggested that Management controls of emissions from Uisce Éireann sites should receive greater priority.

The EPA in their role as regulator would be better placed to comment on regulatory oversight. We have amended Action 3.3 in the WSSP 2050 to address potential pollution threats to water bodies from our water services, including the risks associated with the storage and transfer of chemicals. The action outlines our approach to risk assessment and sets out a commitment to enhance contingency plans and incident response processes. Uisce Éireann has developed a WTP Site Spill risk assessment methodology to determine the potential risk to the aquatic environment from chemicals associated with water treatment used at WTPs. As part of this assessment, risk assessments on sites located in sensitive catchments (e.g., SACs) are prioritised. These assessments will identify any potential risks and inform actions and mitigation measures where required. These risk assessments commenced in late August 2024 and are currently on-going. Site spill risk assessments are also being integrated into the Drinking water safety plan approach.

Additionally, Uisce Éireann's Water Treatment Plant (WTP) Residuals Strategy will inform monitoring to verify risk and inform interventions. The strategy will outline UE's approach to on-site treatment and management of WTP residuals and ensure that investment in new infrastructure is the most cost-effective over the asset's lifespan, while also ensuring that the environment is protected.

We can also confirm that the EPA's "IPC Guidance Note on Storage and Transfer of Materials for Scheduled Activities" has been fully incorporated into Uisce Éireann design specifications regarding chemical storage and associated pipework. UÉ advise that training is underway in relation to chemical use and management on-site, this is a mandatory course for Operators which covers the impact to the environment when chemicals spills occur and spill response guidance. Operations personnel, including WTP and WWTP Operators, are attending this course which is facilitated through the Water Services National Training Centres. Uisce Éireann have also developed a toolbox talk on the safe delivery of chemicals to site which is being rolled out to frontline operations personnel. In addition, a chemical Guidance bulletin has been prepared and is currently being communicated to all operators via the Regional Operational teams. Uisce Éireann have also updated our 'Drinking Water Incident Response Guidance' and have developed a comprehensive suite of operation and maintenance standard operating procedures (SOPs). These SOPs will promote safe and effective chemical management practices by frontline operations personnel. Uisce Éireann expect to commence roll out of standardised operation and maintenance practices to sites on a prioritised basis in Q4 2024.

Transfer of water between catchments

IFI also raised concerns regarding the diversion of raw waters between different river systems and requested “its practice at UÉ sites is documented and published. Significant transfers of water should not occur between catchments due to biosecurity risk and be avoided where possible. Similarly the recirculation of treated wastewater should occur within the same catchment unless otherwise licensed.

In December 2022, the Government published the Water Environment (Abstractions and Associated Impoundment) Act (the "Abstraction Act"). The Abstraction Act commenced on the 28th August 2024 and the supporting regulations came into operation on 29th August 2024. Under the new regime, we will be required to apply to the EPA for licences for all existing abstractions above certain thresholds and for all abstractions that EPA consider to be significant. Through the licensing process Uisce Éireann will undertake more detailed assessments of our existing abstractions and appropriate conditions will be imposed by the EPA.

THMs

IFI highlighted “particularly in areas of where there are high levels of organic matter, the potential for the formation of Trihalomethanes (THM) and related compounds has serious long-term consequences for aquatic biodiversity as well as human health.

See response to THM heading under Action 1.1 of this report.

6.4.4 Action 3.4: Protect and restore water bodies through collaboration

Summary of Action 3.4 Feedback

Data sharing

An Fórum Uisce welcomed “collaboration in terms of the open sharing of data and the development of shared catchment models that will be used to find the most cost-effective measures to meet waterbody objectives.” Inland Fisheries Ireland suggested that communications should include the installation of Event Duration Monitors (EDMs) on all Combined Storm Water and Pumping Station Overflows and publish online in the immediate future. They noted that “Publication of this data would highlight problems, improve transparency and accelerate intervention where ongoing problems exist. This, IFI noted, also aligns with UÉ’s statement in Action 3.4, namely the open sharing of data on all the pressures impacting on water bodies.

Uisce Éireann is in the early stages of its data maturity journey. However, we are also committed to embracing the requirements of the EU Open Data Directive's High Value Datasets (HVD). Uisce Éireann is cognisant of the requirements of the Directive in regard to HVD's. These datasets are defined as documents, the re-use of which brings significant benefits for society, the environment, and the economy. As outlined in Article 14 of the EU Open Data Directive, the identification of specific HVDs is based on their potential to:

- Generate significant socioeconomic or environmental benefits and innovative services.*
- Benefit a high number of users, particularly SMEs.*
- Assist in generating revenues.*
- Be combined with other datasets.*

Uisce Éireann has already begun publishing elements of its data on our website and linking it to the Open Data portal. For instance, the proposed recast rUWWTD will require that Member States ensure that adequate, easily accessible, and up-to-date information on urban wastewater collection and treatment will be made available to the public online including some details of the discharges from Storm Water Overflows in larger agglomerations. Further information on these details and the format and timing of the information may follow in subsequent implementing acts. UÉ will be reviewing this matter with all relevant stakeholders as part of the forthcoming work on the implementation of the rUWWTD.

Disproportionate costs

An Foram Uisce commented that where the WSSP states that there may be a small number of cases where meeting the WFD objectives would be disproportionately costly, the Forum recommended that further justification is provided here and to include details on what may happen in terms of remediating these water bodies." The Forum also recommended that there is more ambition to deal with these cases to deliver the best possible outcomes for water quality, "as Ireland has an obligation to meet the requirements of the WFD."

Uisce Éireann welcome the comment by An Foram Uisce on Action 3.4. Inevitably there will have to be some exemptions to the WFD due to disproportionate cost and/ or technical feasibility. These cases may have multiple significant pressures and in such cases any justification for exemptions will have to address the cost and/ or technical feasibility to address and resolve all of the pressures. If and when any cases for WFD exemptions are justified in relation to urban wastewater pressures, Uisce Éireann would still have obligations to deliver the best possible outcomes by complying with whatever appropriate obligations are set in our wastewater discharge authorisations. As set out in the draft WSSP we are committed to achieving full compliance with our WWDA obligations.

Integrated catchment management

SWAN supported “a multi-sector integrated approach to catchment management, in particular in the context of source protection.”

Our commitment to integrated catchment management is set out in action 1.3 and action 3.8 of the WSSP 2050

Significant pressures & compliance

Inland Fisheries Ireland acknowledged the “significant improvements in compliance in UÉ’s WWTPs since 2013.” Though they wished to see this level of compliance extend to sub-threshold certified wastewater plants, either by the upgrading of these plants, or the diversion of wastewater to licensed wastewater treatment facilities. An Fórum Uisce recommended that the objective of the collaboration should meet the requirements of the Water Framework Directive, in particular addressing the 197 water bodies where urban wastewater pressures is a significant pressure. SWAN recommended a clear commitment is included to halt pollution by Uisce Éireann of the 197 impacted water bodies and made recommendation to amend wording of the action.

Environmental compliance, including removing sites from the PAL, resolving issues where UE’s assets are significant pressures on water bodies and progressively improving compliance with WWDA’s, is prioritised in UE’s capital investment planning process but will take several investment cycles. UÉ is committed to progressively improving compliance at all of our WWTPs, regardless of size, and has several initiatives, in particular for those identified as significant pressures in the RBMP process. UÉ have strengthened our commitment to addressing significant pressures and pal sites within the WSSP.

Combined sewers and overflows

Another stakeholder commented that “combined sewers and storm overflows are a huge risk to our aquatic environment and our recreational waters”.

Uisce Éireann have several actions in our plan to address combined sewers overflow (termed storm water overflows in the relevant legislation) as detailed in Action 3.2 and 3.5 of the WSSP.

Enforcement

One individual commented “there is no suggestion of enforcement to protect what’s left of our biodiversity or secure it for the future”. They requested “changes to planning legislation

and significant penalties for any breaches that negatively impacts the ecosystem and affect the wellbeing of the local community, when and where future industrial and housing developments are being granted permission to build and operate”.

These actions are outside Uisce Éireann's remit.

6.4.5 Action 3.5: Manage wastewater services throughout the asset lifecycle to achieve regulatory requirements

Summary of Action 3.5 Feedback

Compliance

Clare County Council recommended that the WSSP would benefit from the inclusion of more actions to address the ongoing issues at the Wastewater Treatment Plants. The further commented that non-compliant WwTPs impact growth in line with national planning policy. These aims need to be linked to Action 3.1 and 3.4 and specifically Action 3.5 which looks at regulatory compliance. One stakeholder also noted that “the continuation of safe treatment and disposal of wastewater is required so as to reduce any risk to the environment” The EPA acknowledged that “UÉ has made progress on assessing the condition of sewers through drainage area plans and assessment of storm water overflows.” However, they noted that there is no reference to implementing the findings of these drainage area plans and upgrading storm water overflows causing pollution. Previous assessments of shellfish areas over the past decade, have identified the need for infrastructural investment, such as ultraviolet treatment, in specific areas.

Uisce Éireann are committed to managing wastewater assets to achieve full regulatory compliance with the Urban Wastewater Treatment Directive and our Wastewater Discharge Authorisation however it will take a number of investment cycles to meet all the known needs. Actions 3.1, 3.2, 3.4 and 3.5 will all support achievement of regulatory wastewater compliance, The WSSP is a 25 year plan, further detail will be included in lower tier plans such as RC4 investment plan and implementation plans such as the Wastewater Strategy Framework. UÉ are also committed to addressing all significant urban wastewater pressures identified in the RBMP and will be delivering recommendations of drainage area plans on a prioritised basis as part of investment planning process, Shellfish Waters are considered along with other protected areas in the Capital investment plan. As per the methodology that was developed in consultation with the EPA and the bodies specified in the Wastewater Discharge Authorisation, there are works being progressed under the Wastewater Disinfection Programme and where an urban wastewater source has been identified as the issue, and appropriate solution identified, these are progressed through the capital investment projects and programme.

Significant pressures & meeting Water Framework Directive objectives

An Taisce called on Uisce Éireann to commit to addressing the 197 water bodies where urban wastewater specifically is a significant pressure to bring them into compliance with the WFD. “Where this is found to be unfeasible, sufficient justification for a WFD exemption should be outlined and adequate remediation provided.” SWAN recommended that more emphasise must be on meeting WFD objectives, suggested strengthened wording to reflect our commitment and would welcome a strategic aim specifically focused on the WFD, but recommend the language must be strengthened to reflect a stronger commitment. SWAN supported the AFU recommendation that the strategic aim should clearly “reflect UE’s statutory obligation as a public authority, as set out in the European Communities (Water Policy) Regulations 2003 (SI 722 of 2003, S.I. No. 272/2009 - European Communities Environmental Objectives (Surface Waters) Regulations 2009 and the Water Services Act 2007.

Uisce Éireann do commit to meeting our obligations under the Water Framework directive within action 3.5. We are committed to UWWTD compliance, authorisation compliance and addressing all significant urban wastewater pressures identified in the RBMP. Uisce Éireann is committed to not only meeting our own obligations under the Water Framework Directive but going further through playing our part to help Ireland meet WFD objectives through for example collaboration with other external stakeholders, landowners and community groups on wider catchment management-based initiatives that result in source water protection.

Risk assessment, contingency planning and incidence response

The Department of Housing, Local Government and Heritage commended Uisce Éireann’s strong commitment to nature conservation in the draft WSSP, provided for in Strategic Objective 3. However they recommended “comprehensive risk assessments, contingency plans and incident response processes are also required in relation to the implementation of Strategic Objective 3, including additional or improving on existing actions for Strategic Objective 3, whereby there is a commitment to carry out and record risk assessments, prepare and publish contingency plans and incident response procedures for all proposed and existing site infrastructure operated by UÉ.

Uisce Éireann welcome this comment by the Department of Housing, Local Government and Heritage and are committed to protecting and restoring our water environment by mitigating pollution threats to water bodies from our operations and activities. We have amended Action 3.3 to address this risk by undertaking risk assessments, implementing preventative measures, and enhancing contingency plans and incident response processes.

Operations

The EPA commented that there is “very little information in the WSSP about the operation of plants”. The EPA commented that the WSSP focuses largely on development of infrastructure but “more is needed on the processes, procedures, and technical competence to support the infrastructure”. They further noted that “operation and maintenance must be properly resourced to avoid operational issues becoming problematic at plants”.

Uisce Éireann welcome the comment by the EPA on Action 3.5. Our commitment to improve operations and maintenance of our assets is addressed by Action 4.5 which describes our dedication to continuous improvement of our processes, systems and information by striving to achieve ISO 55000 certification. UÉ have amended our WSSP 2050 to include further detail under Action 4.5 on our transition to intelligent operations. In Section 8, under our long-term approach, “Building our culture, empowering our people”, we further explain our commitment to transitioning our skilled and experienced local authority workforce to secure technical knowledge of existing assets and operations. We have also added text to emphasise our dedication to enhancing our training programmes to ensure all employees have the right capabilities and skills to carry out their roles.

6.4.6 Action 3.6: Manage water services throughout the asset lifecycle to achieve regulatory requirements

Summary of Action 3.6 Feedback

Meeting Water Framework Directive objectives

An Fórum Uisce supported the reference to the Water Framework Directive (WFD) as one of the fourteen Strategic Aims but recommended that the wording of Strategic Aim 8 is strengthened to “clearly outline UE’s statutory obligations of the EU Water Framework Directive (as a public authority).

See response under Action 3.4 of this report under heading Significant pressures & meeting Water Framework Directive Objectives.

Impoundments & abstraction authorisation

Inland Fisheries Ireland (IFI) submission referenced Uisce Éireann commitment to “Identify impounding structures which support abstractions”. Inland Fisheries Ireland also recommended that the impact of these structures be assessed and quantified, and

strategies for mitigation or preferably removal developed. Inland Fisheries Ireland noted their preference for removal of structures and their replacement with alternative abstraction infrastructure. Inland Fisheries Ireland also requested that the development of a Fish Pass Programme is “accelerated and prioritised and that IFI should be consulted in this regard. Inland Fisheries Ireland noted Uisce Éireann regulatory requirements in this regard. Tramore Community Rivers Group welcomed reference to the Fish Pass Programme and the removal of impounding structures is welcome and they look forward to its implementation. They also highlighted the requirement to monitor environmental base flows and license abstraction.

Field-based data collection and validation is ongoing as part of abstraction licensing and drinking water safety planning activities. This work includes assessing whether the in-stream structures are barriers to the movement of aquatic species. There is a significant ongoing discussion and collaboration with IFI in relation to barrier removal. Discussions are ongoing with IFI on delivery UEs fish pass programme through a partnership approach.

Uisce Éireann will apply for abstraction licences under the new abstraction legislation, including licences for existing abstractions. The EPA will assess and set appropriate conditions and will set in-stream flow requirements necessary to support healthy ecosystems. UÉ will work towards managing our abstractions, so they are sustainable and meet abstraction licencing requirements. Inland Fisheries Ireland will be a key stakeholder in the abstraction licencing process. UÉ will engage with Inland Fisheries Ireland as part of the process and, where appropriate, will work to improve fish migration upstream and downstream of abstraction points.

Abstractions authorisation

Ibec highlighted how climate change will impact Uisce Éireann’s efforts to maintain a resilient water supply. They further cited the new EPA Licence conditions to reduce offtakes from many existing surface water and groundwater abstractions. “In some cases, it may be necessary to seek temporary derogations from the environmentally sustainable abstraction flow limit, pending the development of new supplies”.

In terms of future abstraction licensing and associated guidance we note that the Water Environment (Abstractions and Associated Impoundments) Act, 2022 (the Abstraction Act) has recently commenced and associated regulations have been published. This legislative regime will be regulated primarily by the EPA, and we await the publication of guidance to inform our approach. Uisce Éireann set out our commitment to sustainable water supplies in Action 3.4 Managing our water services assets.

6.4.7 Action 3.7: Manage our assets to have biodiversity net gain

Summary of Action 3.7 Feedback

Clare County Council commended Uisce Éireann's commitment to ensuring that biodiversity 'net gain' is achieved across its infrastructure projects by 2030 will make a valuable contribution surrounding habitats and ecosystems. Councillor Peter Melrose acknowledges that it appears the importance of biodiversity is now being considered in the creation of human infrastructure. and would like Uisce Éireann to continue to be creative, imaginative, and ambitious when it comes to supporting and enhancing habitats and ecosystems.

Peatlands

The Irish Peatland Conservation Council (IPCC) requested that the WSSP aligns with the outcomes and actions of BOGLAND." The IPCC urges developers to properly assess and screen for impacts on the habitat or species that may occur during construction. They advise there is an opportunity to work with government departments such as the National Parks and Wildlife Service who could advise on areas in need of restoration or stabilisation. Another stakeholder also highlighted the importance of bog habitats,

Uisce Éireann can confirm that we have reviewed the EPA funded project 'Bogland' and agree with the recommendations of the project. Peatlands are a very unique habitat in Ireland and Europe and their protection and restoration is essential in addressing the current climate and biodiversity emergencies. Uisce Éireann agrees that bogs should be protected as they provide vital habitats for a wide range of species, sequester carbon and help to protect our drinking water sources. These will be considered at greater level in Tier 2, Tier 3 plans and at project level. The WSSP is a high-level national plan.

Biodiversity projects

The Department of Housing, Local Government and Heritage welcomed Strategic Aim 9 and Action 3.7 and note it will support Ireland's 4th National Biodiversity Action Plan 2023-2030 (NBAP) and international, European and national commitments. The Department also noted that monitoring biodiversity projects is essential and will be required to support objective four of the NBAP, "Enhance the Evidence Base for Action on Biodiversity". The Department noted that for Action 3.7 no mitigation measure has been recommended within the AA conclusion. And commented it is imperative that any positive biodiversity

actions are appropriate to the location; all biodiversity projects will require screening for AA, in accordance with the Habitats Directive.

Uisce Éireann can confirm that all Uisce Éireann projects, including biodiversity projects, are subjected to the requirements of the Habitats Directive and transposing regulations, and this is reflected in Table 6.6 Action 3.7. Uisce Éireann can also confirm that 'any positive biodiversity actions are appropriate to the location and are only implemented in accordance with the advice provided by competent experienced ecologists.

Comprehensive risk assessment, contingency planning, and incident response

The NPWS recommend an additional mitigation measure is included in the AA, whereby comprehensive risk assessments, contingency plans and incident response processes are prepared to ensure pollution threats can be eliminated at both existing and any planned new sites operated by UÉ.

Uisce Éireann are committed to protecting and restoring our water environment by mitigating pollution threats to water bodies from our operations and activities. We have amended Action 3.3 to address this risk by undertaking risk assessments, implementing preventative measures, and enhancing contingency plans and incident response processes.

Biodiversity Net Gain

Inland Fisheries Ireland welcomed the commitment to Biodiversity Net Gain (BNG). They requested that "there are clear metrics in place for BNG assessment, In addition to tree planting, the restoration of riparian habitat, restoring longitudinal connectivity in rivers, reducing impounded sections of watercourses, reducing risk of fish impingement and entrainment at abstraction points, and preserving ecological base flows in rivers and streams are all metrics which can be utilised for measuring BNG." Fencing of watercourses is another extremely simple and effective method of protecting water quality. The CRU welcomed the biodiversity net gain ambition but questioned whether this ambition has considered implications of the Nature Restoration Law.

Uisce Éireann welcomes Inland Fisheries Ireland submission and can confirm that Uisce Éireann have developed Biodiversity Calculators to assist in quantifying the biodiversity net gain that can be achieved in the delivery of our infrastructure projects. We would agree that the restoration of riparian habitat and restoring the longitudinal connectivity in rivers are all metrics that can and are being utilised in measuring biodiversity net gain. The WSSP has considered the adopted Nature Restoration Law, which was approved by vote of the European Parliament on 17th June 2024. In Ireland, the production of a National Restoration Plan will be led by the NPWS. The

participatory stakeholder engagement process to support the development of the National Restoration Plan has commenced. One of the key tasks of the restoration planning process will be to identify the design, targets and incentive schemes to deliver restoration measures, including consideration of national and EU funding opportunities and a comprehensive assessment of funding needs.

The National Restoration Plan is eagerly awaited, however, in its absence, Uisce Éireann has been proactive and has set objectives and targets to protect biodiversity and are doing so in the knowledge that such objectives and targets will likely need to be revised upon finalisation of the National Restoration Plan. This is reflected in the 4th National Biodiversity Plan; detailing that production and finalisation of a National Restoration Plan will require updating of the National Biodiversity Action Plan by 2027. Likewise, Uisce Éireann will need to review and update its Biodiversity Action Plan when the National Restoration Plan is in place. We have amended the text in Action 3.7 to explain that our next Biodiversity Action Plan will consider Ireland's 4th Biodiversity Action Plan 2023-2030 and the European Nature Restoration Law.

Natural capital accounting

The Department of the Environment Climate and Communications (DECC) requested that “Uisce Éireann consider the application of natural capital accounting in order to protect the environment while managing assets” in both Strategic Objective 3 and 4. They also requested Uisce Éireann to consider “how the Water Services Strategic Plan can contribute to action 3.3 of the Bioeconomy Action Plan, taking into account the publication by the NESC on Natural Capital Accounting: A Guide for Action”.

The bioeconomy action plan is considered in our Net Zero road map and our sustainability framework. It will also be considered in our circular and natural capital approaches including our lower tier plans such as our Circular Economy Design standard the review of the National Wastewater Sludge Management Plan and our Biodiversity Action plan.

Wastewater impact on the environment

Councillor Michael Doyle commented “The environment is being damaged because of faulty wastewater services.”

Uisce Éireann are committed to managing wastewater assets to achieve full regulatory compliance with the Urban Waste Water Treatment Directive and our Waste Water Discharge Authorisations, however it will take a number of investment cycles to meet all the known needs. Actions 3.1, 3.2, 3.4 and 3.5 will all support achievement of regulatory wastewater compliance.

6.4.8 Action 3.8: Champion nature-based solutions and catchment measures in the delivery of water services

Summary of Action 3.8 Feedback

The Southern Regional Assembly welcomed the approach of promoting the role of NBS within the Draft WSSP, an area that the SRA has engaged in as part of the Interreg Europe Blue Green Cities project.

Working with Communities

One individual, Gleann a'Phuca and Cork Rivers Group welcomed Action 3.8 but recommended that clear examples of nature-based solutions are provided together with a more expanded consideration of local opportunities and constraints.

It is our intention that collaboration and working with communities will be the key to finding opportunities for catchment management and nature-based solutions and supporting their delivery on the ground. We have strengthened our wording in this regard in the WSSP.

Integrated urban management planning

The Irish Academy of Engineering stated "Interactions between intense rainfall, storm water drainage, storm water overflows, and discharges of untreated wastewater from combined sewers will always exist. The role of UÉ and local authorities need to be clearly defined and a programme of measures put in place to minimise discharges to the combined sewer network.

Another stakeholder commented that decisions should be taken considering the water systems as a whole, particularly mentioning rainwater, treatment and piped system to the point of use, piped waste and water collection and treatment.

This is addressed through Action 3.2 Develop and implement Integrated Urban wastewater Management Plans and through our system thinking approach to long term planning.

Land use planning

Clare County Council noted that the commitment to employ NBS for wastewater treatment and source protection is commendable. However, "this Action needs to be linked to land use planning to allow Local Authorities to plan for such catchment measures through zoning of appropriate lands. Uisce Éireann will need to work with the Local Authorities in

advance of any such planned additionality to existing plants or future growth/expansion of plants to allow for a timely zoning of appropriate lands for such measures taking future climate risk scenarios into consideration."

Uisce Éireann encourages Planning Authority objectives and initiatives supporting the implementation of Sustainable Urban Drainage Systems (SuDS) and the enhancement of green and blue infrastructure, which is provided for in the National Planning Framework under NPO 57, and NPO 78 (SuDS) and NPO 82 and 90 (green and blue infrastructure) of the Draft First Revision to the National Planning Framework (July 2024). SuDS and green and blue infrastructure are encouraged both in new developments, including the public realm, and as retrofit schemes in existing developed areas. These measures can provide a cost effective and sustainable means of reducing pollution and flooding risk at source by limiting or removing surface water inflows to combined sewers while providing multiple additional benefits such as improved air quality, biodiversity, amenity and noise reduction. The removal of surface water from combined sewers, increasing available capacity for foul drainage for new developments, is particularly relevant to the achievement of compact growth objectives. Uisce Éireann welcomes opportunities to engage with any planning authorities interested in progressing nature-based rainwater management initiatives in line with the Nature-based Solutions to the Management of Rainwater and Surface Water Runoff in Urban Areas Best Practice Interim Guidance Document, and Nature Based Management of Urban Rainwater and Urban Surface Water Discharges - A National Strategy.

Effective nature-based solutions

Inland Fisheries Ireland welcomed the initiative which can have significant co-benefits for water quality and aquatic habitat and biodiversity. "ICWs and nature-based solutions must be capable of consistently achieving effluent quality standards that ensure good ecological status in receiving waters. It is imperative that only NBS which can consistently guarantee excellent nutrient removal throughout the year should be considered. Long-term maintenance agreement for such solutions must be put in place to ensure their continued effectiveness."

Uisce Éireann are committed to designing most effective NBS wastewater treatment systems with multiple benefits for water quality, habitat and biodiversity as well as energy efficiency, low carbon solutions. UÉ is leading a research project on NBS for WW treatment with University of Galway which is about investigating the performance of wetlands through seasonal variations and interrelationships with variability in receiving waters assimilative capacity to allow us to design the most appropriate sustainable solutions.

Blue Dot catchments

LAWPRO noted that “the plan does not reference high status objective waters or Blue Dot waters, or the Blue Dot Catchments Programme. As the standards required to protect and restore this network of water bodies is higher than for good status, this is a significant omission within the Plan and as a result, the SEA and NIS”. LAWPRO would like to see a firm commitment to the protection and restoration of all Blue Dots given their sensitivity and the lower number of water bodies impacted by wastewater.”

In response to this comment by LAWPRO, we have added a recognition of the high-status objective to end of first paragraph in Action 3.4 above, blue dot catchments are considered within the SEA.

Integrated catchment management

LAWPRO also requested to see a greater commitment to investment and coordination with other state agencies in progressing integrated catchment management to ensure clean and sustainably managed water supplies. As well as risk assessment on sources an assessment of the cumulative impact of multiple abstractions on a water body (especially sensitive water bodies with a high-status environmental objective) should also be detailed. SWAN believed that “water and wastewater services management can only take place within, and not alongside, integrated catchment management and we recommend that this approach be more strongly articulated in the final WSSP.” IAE stated that Source protection through catchment management and nature-based solutions are essential to protect our water resources.”

See response under heading Integrated Catchment Management in Action 1.3. We have strengthened our wording in Action 3.4 on collaboration and coordination through Water Framework Directive planning governance and implementation structures.

Protection of upland areas

The same stakeholder requested that Uisce Éireann “input into the management of some upland areas in which to plant trees to reduce run-off during storms and some flushing meadows which can provide a buffer area for excess water volume during floods”. The stakeholder commented that these areas “should be protected from being built on as they already have another function”.

Native woodland planting is being considered within catchments to protect water sources. Local authorities deal with planning decisions, and we engage with them to make them aware of the sensitivities and risks in our drinking water catchments.

Definitions

Green Spaces for Health commented that “the draft plan we argue is too vague on nature-based solutions. It is not strong enough on describing exactly how nature-based solutions can be employed at scale and it does not include a clear definition on what nature-based solutions are and how they may be implemented.”

Uisce Éireann will update the glossary term to this “NBS are defined as “actions to protect, conserve, restore, sustainably use and manage natural or modified terrestrial, freshwater, coastal and marine ecosystems which address social, economic and environmental challenges effectively and adaptively, while simultaneously providing human well-being, ecosystem services, resilience and biodiversity benefits” (UN Environment Assembly, 2022) “.

6.4.9 Conclusions on Strategic Objective 3

Having carefully reviewed the submissions received on Strategic Objective 3 Uisce Éireann have considered the following clarifications should be provided in the WSSP 2050.

Clarifications on Strategic Objective 3

The following sections of the WSSP 2050 have been updated to reflect feedback:

Section 6.2, Action 3.3 – In response to IFI’s comment on the environmental risks associated with chemical handling on drinking water treatment plant sites, Action 3.3 has been amended to incorporate our approach to addressing potential pollution threats to water bodies from our water services, including the risks associated with the storage and transfer of chemicals. The action has changed to, “Manage our water service assets and operations to reduce the risk of impacts to water bodies”.

Section 6.3, Action 3.3 - In response to the DHLGH and NPWS submissions on managing risks we have amended Action 3.3 to refer to our approach to risk assessment and our commitment to implement preventative measures and enhance contingency plans and incident response processes.

Section 6.3 – Action 3.5 has been amended to emphasise our commitment to environmental compliance, including removing sites from the EPA’s Priority Areas List (PAL). We have added text to strengthen our commitment to work stakeholders, including

industry customers to enhance treatment at the source to improve the quality of trade effluent discharging into sewers.

Section 6.3, Action 3.4 – In response to LAWPRO, we have added a recognition of the high-status objective to end of first paragraph. Blue dot catchments are considered within the SEA. We have also strengthened our wording on collaboration and coordination through the WFD governance and implementation structures.

Section 6.4, Action 3.7 – We have amended the text in Action 3.7 to explain that our next Biodiversity Action Plan will consider Ireland's 4th Biodiversity Action Plan 2023-2030 and the European Nature Restoration Law.

Section 6.4, Action 3.8 - We have strengthened our wording on collaboration and working with communities for catchment management and nature-based solutions and supporting their delivery on the ground.

Section 7.4, Action 4.5 – We have included further detail on our transition to intelligent operations, supporting our commitment to improve operations and maintenance of our assets.

Section 8, under our long-term approach, "Building our culture, empowering our people", we further explain our commitment to transitioning our skilled and experienced local authority workforce to secure technical knowledge of existing assets and operations. We have also added text to emphasise our dedication to enhancing our training programmes to ensure all employees have the right capabilities and skills to carry out their roles.

Glossary – The definition of Nature-Based Solutions has been updated to, "Nature-Based Solutions (NBS) are defined as actions to protect, conserve, restore, sustainably use and manage natural or modified terrestrial, freshwater, coastal and marine ecosystems which address social, economic and environmental challenges effectively and adaptively, while simultaneously providing human well-being, ecosystem services, resilience and biodiversity benefits" (UN Environment Assembly, 2022).

6.5 Strategic Objective 4: Sustainable Services Fit for the Future

In this chapter, we summarise the key references in submissions to issues under Strategic Objective 4. Within the overall heading of Strategic Objective 4 there were 54 references. We have further categorised submissions under the Actions as identified in the draft WSSP 2050. We deal with each of the Actions in this chapter, setting out first a summary of the relevant references in the submissions, followed by our response.

In our response survey, several stakeholders welcomed Strategic Objective 4 and noted it as important that multi-annual budget certainty, faster decision-making processes and more collaboration and cooperation between stakeholders in the water sector. Stakeholders including; CRU, Ibec, DECC, CRU and IAE all welcomed the aims and actions under Strategic Objective 4.

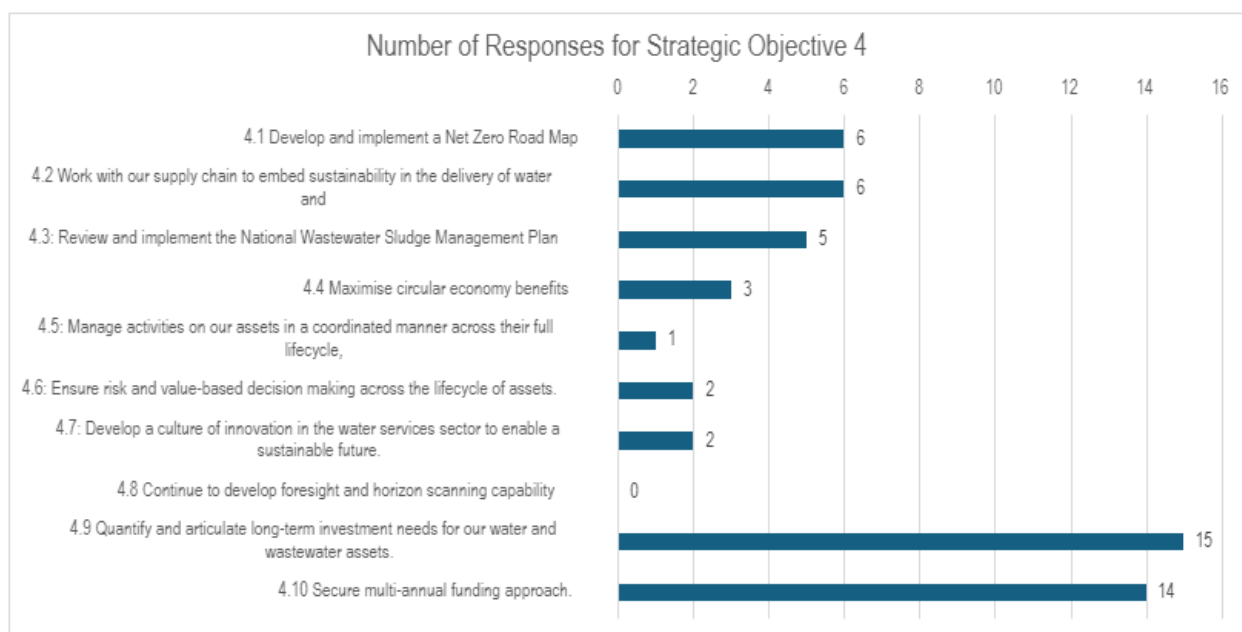


Figure 12 Number of Responses for Strategic Objective 4

6.5.1 Action 4.1: Develop and implement a Net Zero Road Map

Summary of Action 4.1 Feedback

Commitment to take mitigating actions to reduce greenhouse gas emissions

Inland Fisheries Ireland submission (IFI) discussed the Intergovernmental Panel on Climate Change's AR6 report which warns that "climate disruption is accelerating and that "immediate, rapid, and large-scale reductions in greenhouse gases" are necessary". In the

context of this, IFI welcomed Uisce Éireann's commitment in the draft WSSP to take mitigating actions to reduce GHG emissions. An individual stakeholder commented that "there is no explicit call out to deal with methane or NO2 greenhouse gas emissions".

Uisce Éireann welcome Inland Fisheries Ireland comments on Uisce Éireann's commitment in the draft WSSP to take mitigating actions to reduce GHG emissions. Our commitments to GHG reduction which included NO2 is set out within Action 4.1.

Energy efficiency

The CRU would like to see "Uisce Éireann address the Energy Efficiency First Principle in the WSSP 2050, and how this will look in practice" in response to the European Union's recast Energy Efficiency Directive EU/2023/1791. The CRU also requested that "Uisce Éireann confirm if it will include and discuss the Energy Efficiency First Principle in their 'Road Map'". The Irish Academy of Engineering noted Uisce Éireann's demand for energy "will inevitably increase in future given the utilities need to provide for ongoing population increase, economic growth and the impact of evolving national and EU legislative requirements. This increased need can be partially addressed by selecting processes and equipment that is more efficient and carbon neutral".

Uisce Éireann note comments from the CRU and Irish Academy of Engineering on the Energy Efficiency Directive, the Energy Efficiency First Principle, energy demands and advise that these are being considered and incorporated into our Net Zero Roadmap. Energy efficiency improvement is a key sustainability measure to help ensure water and wastewater services are resilient to climate change and for developing a low greenhouse gas (GHG) emitting water and wastewater service. Uisce Éireann accounts for 21% of public sector electricity consumption and is by far the largest consumer of electricity in the public sector. We are therefore focused on improving energy efficiency in asset design, upgrades, lighting and heating, transport and process, as well as on renewables such as PV, wind and biogas, and focusing on reducing demand (Use Less), particularly in the context of the current energy crisis.

We have made significant progress on our journey to become an energy efficient, low carbon, sustainable water utility. We have achieved improvements of over 30% in our energy efficiency. We are developing plans to move towards net zero carbon, including further development of renewable energy sources on our assets, linking energy use from greenhouse gas emissions. See also response regarding critical entities' directive under response to Action 4.5.

Bioeconomy Action Plan

One stakeholder noted that Uisce Éireann's "assets need to be aligned with the National Bioeconomy Action Plan 2023-2025 (Action 4.1.1) and need to be engaged in the development of water infrastructure for bioeconomy demonstration initiatives".

The bioeconomy action plan is considered in our Net Zero road map and our sustainability framework. It will also be considered in our circular and natural capital approaches including our lower tier plans such as our Circular Economy Design standard, the review of the National Wastewater Sludge Management Plan and our Biodiversity Action plan.

6.5.2 Action 4.2: Work with our supply chain to embed sustainability in the delivery of water and wastewater infrastructure

Summary of Action 4.2 Feedback

The Eastern and Midlands Regional Assembly discuss the Regional Spatial and Economic Strategy (RSES), in their strategy, noting the Climate Action and the Climate Strategy of the RSES which "aims to ensure that the RSES drives climate resilience throughout the Region and accelerates climate action". They make particular reference to Regional Strategic Outcome (RSO) 9 'Support the Transition to Low Carbon and Clean Energy', RSO 8 'Build Climate Resilience' and RSO 7 conservation and enhancement of the water resources in the Region. EMRA also commented that "Climate Regional Policy Objectives (RPOs) are also integrated throughout the RSES and include priorities related to the built environment, sustainable transport, energy and waste, flood resilience and water, and green infrastructure and ecosystem services".

Climate change

The EPA noted that "risks from climate change should be considered in the WSSP from both water services and environmental perspectives". They also highlighted the importance of River Basin Management Plans and Drinking Water Safety Plans as appropriate tools through which integrated catchment management and resilience to the expected impacts from a changing climate will be achieved. In seeking to include a consideration of climate vulnerabilities and risks in the WSSP, the EPA referred Uisce Éireann to Ireland's Climate Change Assessment Reports and ongoing work on the National Climate Change Risk Assessment (NCCRA).

The risk from climate change vulnerabilities and risks on both wastewater and water services are being incorporated into our Sustainability Framework and considered throughout the WSSP. For example, actions related to integrated urban wastewater management planning, review of the national water resource plan and development of wastewater strategy will all need to consider future climate change scenarios. We can confirm that Ireland Climate Change assessment reports and NCCRA will also be considered in our sustainability framework and considered in the development of our Tier 2 plans.

Innovation

The Department of the Environment, Climate and Communications (DECC) requested that “Uisce Éireann consider emerging knowledge on biorefinery and wastewater treatment and encourage Uisce Éireann to identify actions to move from this knowledge base to piloting/scaling and maturing the uptake of this technological development on a phased basis”.

In response to Department of the Environment, Climate and Communications (DECC) requests on biorefinery and wastewater treatment we welcome this and note that it is incorporated into our innovation approach. We have a four-stage innovation process that seeks to advance the scaled application of innovative and value-adding processes and technologies. The scope of our research includes synergies between our future operations and emerging processes in adjacent sectors. We will continue to work with key stakeholders and the supply chain to ensure opportunities for resource recovery, energy efficiency and sustainability are developed, understood and realised.

Biogas and collaboration with Gas Networks Ireland

Gas Networks Ireland noted that “projects such as the proposed Regional Sludge Hub Centre under the Greater Dublin Drainage Project, where the treatment process will generate biogas, for use as a renewable energy source on site, have the potential to present collaborative opportunities between Uisce Éireann and Gas Networks Ireland”.

We are committed to building on our current engagement and collaboration with Gas networks to ensure we work together for a more sustainable Ireland.

Renewable energy

One stakeholder noted that “renewable energy from wind and solar with battery storage should be implemented on as many sites as possible”. The EMRA and a stakeholder’s referenced the Climate Strategy of the Regional Spatial and Economic Strategy (RSES),

which “aims to ensure that the RSES drives climate resilience throughout the Region and accelerates climate action”. Particular reference is made to Regional Strategic Outcome (RSO) 9 ‘Support the Transition to Low Carbon and Clean Energy’, RSO 8 ‘Build Climate Resilience’ and RSO 7 which is concerned with the conservation and enhancement of the water resources in the Region. They noted that “the energy use implications, and the associated impacts on the environment and climate, of supplying and pumping water over distances when delivering water supply, should also be taken into consideration by UÉ, and the most energy efficient methods should be employed in this respect”.

Renewable energy and energy efficiency are considered in our Net Zero Roadmap. Please see also the response under heading energy efficiency under Action 4.1.

6.5.3 Action 4.3: Review and implement the National Wastewater Sludge Management Plan

Summary of Action 4.3 Feedback

In the Eastern and Midlands Regional Assembly (EMRA) submission, they referenced the Climate Regional Policy Objective 10.13 from the Regional Spatial and Economic Strategy and noted that this “outlines that EMRA shall support appropriate options for the extraction of energy and other resources from sewerage sludge in the Region”. They suggested that RPO 10.13 aligns with Action 4.3 as well as Action 4.4 to maximise circular economy benefits.

Anaerobic digestion

Gas Networks Ireland supported Uisce Éireann’s commitment to “continue to incorporate anaerobic digestion into the sludge treatment process and use the biogas produced for energy recovery”. They noted that this approach is “well aligned to the recently published National Biomethane Strategy where one of the five key pillars of the strategy is Bioeconomy and Circular Economy”.

Uisce Éireann note and agree with Gas networks on the commitment to anaerobic digestion into the sludge treatment process and reuse of the biogas produced for energy recovery.

Micropollutants

Inland Fisheries Ireland had concerns that “micro-pollutants in biosolids are not subject to sufficient oversight and are at risk of leaching into the aquatic environment through infiltration through soils or surface run-off”.

Uisce Éireann note Inland Fisheries Ireland comment and are actively engaging in research in this area for example, regarding quality of sludge, we are committed to compliance with legislation. Uisce Éireann's wastewater sludge is managed in accordance with our National Wastewater Sludge Management Plan. UÉ wastewater sludge is treated to comply with the requirements of the Sewage Sludge Directive 86/278/EEC on the protection of the environment, and in particular soil. UÉ utilises our Sludge Framework Contractors to support this. The reuse of biosolids in agriculture is managed in accordance with the associated Nutrient Management Plans. These Nutrient Management Plans are approved and monitored by the Environment Section of the Local Authority.

Bio economy

Irish Business and Employers Confederation (Ibec) noted that a number of Uisce Éireann's activities, such as the updating of the National Wastewater Sludge Management Plan, impact particularly on certain sectors of the economy. They advised Uisce Éireann "to engage proactively with members in the agrifood sector, some of whom previously raised concerns over the categories of farmland on which the recovered material might safely be spread". They also suggested "a greater use of SuDs to absorb sludge residuals may help to avoid conflict, while also enabling more circular use of materials through nutrient recovery". The Department of the Environment, Climate and Communications (DECC) requested that Uisce Éireann "reference the bioeconomy, alongside circular economy approaches with regards to reviewing and implementing the National Wastewater Sludge Management Plan, in line with the participation of Uisce Éireann in the Irish Bioeconomy Forum". In particular, they requested reference to "biorefinery as part of the consideration of advanced technologies and processes to extract even more value from sludge, potentially creating new products or energy sources".

DECC also encouraged "Uisce Éireann to outline the continuation to incorporate anaerobic digestion into the sludge treatment process and use the biogas produced for energy recovery and also to examine the development of biorefinery". They requested that Uisce Éireann "reference the Bioeconomy Action Plan 2023-2025 and the need to develop bioeconomy demonstration initiatives (action 4.1 of the Bioeconomy Action Plan) and to consider developing one such initiative involving urban biowaste including sewage sludge from wastewater". DECC requested "Uisce Éireann consider the Bioeconomy Action Plan 2023 – 2025, particularly for considering the development of urban and regional bioeconomy initiatives which focus on making biobased products from urban biowaste and sewage sludge."

In response to Ibec and DECC Uisce Éireann are engaging with the Agri food sector on the review of our Sludge Management plan and will be going out for public consultation on the plan. We

are also advocating the use of Nature Based Solution such as sludge drying reed beds. The Bioeconomy Action Plan is considered in our approaches to the circular economy and will be considered in the review of the National Wastewater Sludge Management plan. We welcome DECC comments and we will incorporate into the review of the plan as we see it to be key to our sustainability objectives and the circular economy. AD is a core part of our sludge treatment approach and will continue to be so into the future to maximise the generation of biogas. The bioeconomy action plan is being considered in our Net Zero road map and our sustainability framework. It will also be considered in our circular and natural capital approaches including our lower tier plans such as our Circular Economy Design standard, the review of the National Wastewater Sludge Management Plan and our Biodiversity Action plan.

6.5.4 Action 4.4: Maximise circular economy benefits

Summary of Action 4.4 Feedback

The Eastern and Midlands Regional Assembly (EMRA) commented that this action “is supported by the Regional Spatial and Economic Strategy which states that the bioeconomy, which is the renewable energy segment of the circular economy, in Ireland has enormous potential which is yet to be unlocked”. They noted that this requires investment and implementing systemic changes that cut across different sectors. “In this regard, Regional Policy Objective 7.34 outlines that EMRA supports the exploration of opportunities in the circular resource-efficient economy”.

The Department of the Environment, Climate and Communications requested that Uisce Éireann’s consider the following when finalising the plan in the context of this aim: “Waste Action Plan for a Circular Economy Circular Economy Act 2022 Whole Government Circular Economy Strategy”.

DECC also requested “Uisce Éireann consider the role of biorefinery within the context of upgrading wastewater treatment plants, in line with circular economy and bioeconomy policy developments.” An individual from the department of Agriculture, Food and the Marine noted that “as indicated in the National Bioeconomy Action Plan 2023-2025 (Action 4.1.1) DAFM, DECC, DHLGH and Uisce Éireann should work together to develop biobased products from wastewater to develop circular bioeconomy opportunities”.

Uisce Éireann welcome the submission received in relation to Action 4.4. and note they are incorporated into our Circular Economy approach and associated standards. We further agree that collaboration with others, including the departments, is important to delivering our circular economy approach.

6.5.5 Action 4.5: Manage activities on our assets in a coordinated manner across their full lifecycle, with the aim of achieving ISO 55000 certification.

Summary of Action 4.5 Feedback

The CRU regarded Uisce Éireann's plan to achieve ISO 55000 certification as "a positive step towards managing assets effectively". They note that "given the scale of Uisce Éireann's asset base, it is imperative that these assets are managed and maintained in a cost-effective manner to deliver services at the lowest asset lifecycle cost". They commented that this starts with Uisce Éireann continuing to improve its asset data and were pleased to see this included in the draft WSSP 2050. The CRU also "welcomes Uisce Éireann's plans to deliver planned maintenance in a timely manner, rather than reactive maintenance". They noted that "these improvements to asset management will be key to ensuring that Uisce Éireann's assets are operationally resilient and avoid service disruption to customers". They further noted that "Uisce Éireann needs to remain cognisant of any other threats that exist to their assets such as climate change, cyber security, or single points of failure. It is therefore imperative that Uisce Éireann have comprehensive plans for maintaining and securing their assets, ensuring they remain resilient to all potential threats that could disrupt or damage any assets".

The CRU agreed with Uisce Éireann that "there will be an increasing need to focus on asset resilience and maintaining asset health". They requested "to see the urgent and measurable steps in the short-term and long term, that Uisce Éireann will take to start delivering on this aim, within defined time periods". The CRU are particularly interested in "the understanding of areas of vulnerability, so that appropriate improvements can be made, or the need for new investments or safety measures that can be planned and delivered". Additionally, the CRU intends placing a particular focus on asset maintenance when assessing Uisce Éireann's RC4 Investment Plan, so the CRU wishes to understand how preventative maintenance more clearly has been factored into Uisce Éireann's plan".

Uisce Éireann welcomes CRU's feedback, as stated in Strategic Aim 12 we will manage the risk and resilience of our services through best practice asset management. Within the current draft Capital Investment Plan RC4, UÉ sets out investment cases to address service resilience and asset maintenance over the next 5 years within our RC4 submission. Further detail is provided in our RC4 submission. UÉ has optimised investment decisions by prioritising the best possible service improvements, while ensuring security of supply and maximizing value, dedicated to helping communities to thrive. UÉ has also set out our governance and Capital investment processes within our RC4 submission. UÉ are also working towards ISO 55000 certification.

Uisce Éireann are aware that they will potentially fall within the scope of the new Critical Entities Resilience Directive for both Water and Wastewater. UÉ have had engagements with both the DHLGH and the Department of Defense (CER Group) in relation to the directive. UÉ will shortly commence our own internal assessments to determine any impacts to our existing resilience models.

Clear lines of responsibility for the management of risk are a key element of effective risk management and within the UÉ enterprise risk management framework there is formal reporting and escalation of risks on a regular and defined basis. Project/programme risks are analysed both qualitatively and quantitatively and are recorded, reviewed and updated on a regular basis as new risks emerge, with risk registers updated and a refresh of risk controls and actions undertaken on an ongoing basis. UÉ Directorates report on a quarterly basis on key, emerging and trending and high impact/low probability risks, and escalates risks as required to the UÉ Assets and Services Risk Sub-Committee, the UÉ Risk Management Committee and the UÉ Board, as required. For example, current key strategic risks for UÉ with the potential to impact delivery include global economic, political and social risks such as: the current macroeconomic and heightened geopolitical environment; inflation; resourcing challenges; operational and organisational transformation challenges; and disruption to supply chains, all of which are driving uncertainty. These risks are being actively managed at both a project/programme level and at an enterprise level in line with the overall UÉ enterprise risk management framework.

6.5.6 Action 4.6: Ensure risk and value-based decision making across the lifecycle of assets

Summary of Action 4.6 Feedback

Risk-value-based decision making

Tipperary County Council noted that Plans will be delivered based on 'Risk / Value-based decision making' (see Figure 1 of the Plan). TCC requested that value for money and whole life costs are based not just on the monetary return on investment but more on the environmental and community benefit that will result from the provision of the required wastewater infrastructure.

The Capital Investment Plan will be a dynamic portfolio of investments, which will be monitored and reviewed by both UÉ and other stakeholders over the course of the five-year period. It will be targeted at addressing the most critical investment needs and responding to any emerging policy requirements, which will be reflected in updated investment allocations, if required. UÉ ensures that health and safety is a top priority to ensure that we meet our responsibilities, UÉ also prioritises its investment around the following 3 themes of the water services policy statement:

1. **Availability and Reliability:** water services will support regionally balanced economic and social development through accessible, dependable and reliable water services.
2. **Safety and Quality:** water services will be safe and protect human health.
3. **Sustainability:** water services will be efficient, resilient and sustainable in the long term.

The investment planning methodology and informed decision-making is outlined in section 4 of the draft RC4 submission paper for the CRU.

The investment planning approach allows an appropriate combination of interventions to be identified based on legislative, business, operational and financial constraints. It will also support in delivering on the Government's WSPS Objectives, NPF objectives and UÉ's WSSP Objectives, in the most effective and efficient way. It also allows UÉ to monitor and report to stakeholders on the progress made against achieving these targets and objectives.

UÉ uses an asset management approach which focuses on managing asset and service risks and realising value from our water and wastewater assets across the asset base to achieve the desired objectives across service delivery and environmental improvements. Applying the asset management approach delivers benefits to Uisce Éireann:

- *Better customer Outcomes and value for money*
- *Safe operations and services for staff and customers*
- *Whole lifecycle management of the assets*
- *Good asset knowledge informing all investment decisions*
- *Better planning for environmental, sustainability and asset resilience*

The asset management approach is incorporated into the investment planning process and ensures maximum value over the lifetime of UÉ's assets for its customers.

6.5.7 Action 4.7: Develop a culture of innovation in the water services sector to enable a sustainable future

Summary of Action 4.7 Feedback

Innovation process

The Irish Academy of Engineering commended Uisce Éireann's "approach to innovation since its establishment and strongly support and encourage that approach into the future". Their submission noted the Plan's reference to adopting innovative approaches and technologies to problems and challenges such as climate change, and higher standards for

potable and treated water. However, the IAE commented that “this is presented as an intention rather than a commitment and the ‘how’ needs to be more explicit”.

Uisce Éireann innovation will develop portfolios of innovation that address priority business challenges. Each initiative will be sponsored by a senior leader and will be supported through 4 stages of our innovation process (ideate, incubate, target, accelerate). The aim at each stage is to inform decision making and acceptability of new solutions to be adopted and realise value for UÉ, customers and communities. Increased adoption of innovative solutions will be realised through developing and continuously improving the requirements for our asset base in the UÉ Standards and Specifications.

Collaboration with stakeholders for innovative solutions

The Eastern and Midlands Regional Assembly (EMRA) commented on the “need for appropriate adaptation or climate proofing measures will be necessary to ensure a comprehensive response to the challenge of climate change in the Region”. In this respect, they referenced Climate Regional Policy Objectives 7.43 from the Regional Spatial and Economic Strategy which “highlights that Climate Action Regional Offices and local authorities should consider the identification of critical infrastructure within their functional areas, particularly of the interdependencies between different types of sectoral infrastructure, as a first step in ‘future proofing’ services and to help to inform longer-term adaptation planning and investment priorities”. EMRA suggested that Uisce Éireann “seek collaboration between relevant stakeholders to inform future solutions in this regard. This would align with the action to develop a culture of research and innovation, through knowledge sharing and collaboration”.

Uisce Éireann has established an internal innovation community to prioritise and oversee our innovation initiatives and engagement with external stakeholders including relevant agencies. Within the community, communication and knowledge management is an essential aspect of sharing the learning and adoptability of solutions emerging from the wide range of collaborations with universities, industry and peer organisations.

6.5.8 Action 4.9: Quantify and articulate long-term investment needs for our water and wastewater assets

Summary of Action 4.9 Feedback

The CRU acknowledged in their submission “the importance of predictable and stable funding arrangements to optimally and efficiently deliver multi-annual investments”. However, they noted that “given the context of the funding arrangements within which

Uisce Éireann operates, it is vital that Uisce Éireann seeks ways to optimise its funding model to ensure that the agreed outputs and outcomes that its commits to are delivered within the revenue ceilings determined by the CRU". The CRU noted that "while aspects of Uisce Éireann's funding model are currently under review, the CRU will continue to determine a fixed annual revenue and Uisce Éireann must strive to achieve its investment and delivery plan within this funding envelope". Councillor Michael Doyle stated via the feedback form that a "huge increase in investment needed"

Clarification on the spend

One individual commented looked for further clarity on how today's funding is spent and on what investment projects.

The WSSP is a strategic long-term plan, thus will not have contain this level of detail. Within the current draft Capital Investment Plan RC4, UÉ has optimised investment decisions by prioritising the best possible service improvements, while ensuring security of supply and maximizing value, dedicated to helping communities to thrive. UÉ as a regulated utility has funding constraints and needs to prioritise investment where it is needed most. Appendix four of the RC4 plan sets out a list of projects and programmes based on the current methodology set out in the document and taking on board stakeholder requirements and feedback, as appropriate, received to date. The Projects and Programmes listed are expected to be either commenced, progressed or completed during the 2025 to 2029 period. This draft is continuously being refined and is subject to budget, legislative changes, technical, supply chain and environmental constraints, as well as statutory approvals.

Uisce Éireann are continuing to invest in and prioritise where we can deliver improvements for the most critical needs in drinking water quality, leakage reduction, water availability, wastewater compliance, efficiencies and service for consumers. This Capital Investment Plan sets out UÉ's budgetary plan for our capital investment in the water services network for the period 2025 to 2029. This capital budgetary plan will be in line with the objectives as set out in the Government's Water Services Policy Statement (WSPS). In preparing the Capital Investment Plan, UÉ must optimise investment decisions by prioritising the best possible outcomes, while balancing risk, deliverability and maximising value for money.

Plan-led development

The Irish Home Builders' Association and Construction Industry Federation recommended "including plan-led development as a strategic aim under the fourth objective, to ensure sustainable infrastructure and unlock various developments (commercial, schools,

hospitals, housing). They further commented that this “should also be mirrored by the CRU, to reflect the focus on plan-led development”.

Uisce Éireann agree with Irish Home Builders' Association and Construction Industry Federation that supporting plan-led development is important to supporting growth and ensuring sustainable infrastructure. Action 2.7 of our WSSP explains that we follow a plan-led growth approach through our engagement with planning authorities. UÉ have amended our glossary of terms to include Plan-led development.

Investment plan

The CRU “understands that Uisce Éireann is likely to request a significant step-up in annual revenues over the medium term compared to investment to date. In light of the significant sums of customer money that is to be invested, it is crucial that Uisce Éireann embed the need for efficiency, a strong focus on customers and the environment and a philosophy of value for money into all aspects and levels of its business”. The CRU further noted that “Uisce Éireann should aim to develop solutions that best ensure long-term stability and predictability in its investment plan, to enable timely and efficient investment delivery. This includes the flexibility to swiftly incorporate any lessons learned to ensure ambitious investment plans are delivered efficiently and within the required timelines”. In this regard, they commented that the “Governance Framework will need to consider and demonstrate how the achievement of these aims are going to be measured and reported”.

Uisce Éireann welcomes and note CRUs comments. Uisce Éireann has undertaken a significant body of work to update policies, standard operating procedures, reporting, guidance, training, etc. to address the requirements of the Infrastructure Guidelines (formerly called the Public Spending Code) and the Sector Specific Guidelines. Substantial progress has been made in refining UÉ's investment planning and management processes as well as the Project Lifecycle framework to align to PSC and Scottish Waters International review to ensure effective governance to the identified investments. The details of which are outlined in the RC4 submission. The CRU has also engaged an additional third-party review to verify implementation of SWI's review. Another key objective of this review was to provide UÉ with further implementable recommendations identified, with the intention of driving further improvements in UÉ's processes, systems and people. UÉ have included details of our governance framework in our RC4 submission.

Robust data and digitisation

The CRU noted that “Robust Data and Digitisation is a significant issue that will need to be addressed by Uisce Éireann”. They commented that “when making investment decisions, accurate and robust data is crucial” and “the collection, collation and management of

relevant data is imperative in order to facilitate decision-making regarding water and wastewater services". Their submission noted that "improvements required in the availability and access to data and information and the collection and collation of robust data across its investments and knowledge base on assets health would merit strong emphasis in Uisce Éireann's WSSP 2050".

Uisce Éireann recognises that accurate and robust data is a key component of any modern utility. Since inception, Uisce Éireann has worked to improve ways of working and streamline systems and processes to deliver consistent and accurate data. During RC4, Uisce Éireann will continue to invest in data improvement initiatives such as Invest to Outcome Digital and Data Improvement Plan Further details will be provided as part of our RC4 submissions to the CRU.

We have included details of our governance framework and on informed decision making in our RC4 submission to the CRU.

Operating capital expenditure

The Irish Academy of Engineering commented that "there is a case to be made for a change to the current approach of separating operating expenses, and capital expenditures to one which provides flexibility to the utility to take a more holistic approach to the management of its asset base". One stakeholder commented that "the networks are degrading faster than can be maintained at the present rate of renewal". While another submission requested "a 10-to-20-year Capital Program to replace the old infrastructure". One stakeholder commented that there is "no explicit description of a rolling capital maintenance plan was given, with which the system will continue to deteriorate.

The CRU is Uisce Éireann's economic regulator who determine our revenue regulatory regime including the current RC3 building block regime consisting of separate operating and capital expenditure. We include aging infrastructure as one of our key challenges and actions to address this are set out throughout our WSSP. Historically, capital maintenance in Ireland's water services sector has been well below adequate long-term maintenance levels. We have started to address this by building up our capital maintenance activities over the previous investment periods and this will continue into RC4. Uisce Éireann's capital investment plans are on a 5-year cycle as required by CRU Our RC4 Capital Investment Plan sets out UÉ's plan for our capital investment in the water services network for the period 2025 to 2029. Future Revenue Controls we will continue to invest in our networks to deliver improvements for the most critical needs in drinking water quality, leakage reduction, water availability, wastewater compliance, efficiencies and service for consumers in linked with the Government's policies and plans.

Recast Urban Wastewater Treatment Directive

LAWPRO commented that a funding model is needed “to meet the requirements of the proposed recast Urban Wastewater Treatment Directive”.

The requirements of the recast Urban Wastewater Treatment Directive, once it is adopted, will be incorporated into future capital investment plans. In relation to quaternary treatment, transposition of the recast directive into Irish legislation will need to address how the funding model for this element will be put in place in line with the extended producer responsibility provisions of the directive.

Regional Spatial and Economic Strategy

it is essential that the Eastern and Midland Regional Assembly and Uisce Éireann engage and collaborate over the course of the review of the RSES to ensure compliance with legislation and proper planning and sustainable development”. EMRA comment that this specifically would apply to action 2.6 engaging and collaborating with key stakeholders to support national, regional, and local planning policy, and action 4.9 which is concerned with quantifying and articulating long-term investment needs for water and wastewater assets. We note the submission from the Eastern and Midland Regional Assembly and welcome collaboration with the ERMA for the review of the RSES to ensure compliance with legislation and proper planning and sustainable development.

Tariffs

IDA Ireland commented that “Uisce Éireann’s (and by extension CRU) approach to pricing should take a holistic view, recognising the significant contributions that are already made by non-domestic consumers including through corporation taxation receipts, job creation and expenditure throughout the Irish economy”. They noted that this is particularly important against the backdrop of Ireland’s aging infrastructure for water provision that is urgently in need of upgrade. They also noted that “a long-term, strategic view on the provision of this enabling national infrastructure (incl. consideration of funding sources) should be taken, and recognise that investment now, without seeking full cost recovery, will be recouped many times over in the medium and long term through increased job creation, innovation and investment in Ireland”. IDA Ireland’s submission also questioned “whether it is reasonable for enterprise, that is already making a significant contribution to the economy, to be penalised, through increased tariffs, for past failures to maintain and upgrade Ireland’s water infrastructure”. They noted that “this draft plan recognises the legacy of underinvestment in water services over many decades and consequent deficiencies in Ireland’s water and wastewater assets, compared to other European

countries”, despite this, tariffs are increasing in October 2024, with further increases signaled”.

Since 2014, UÉ have been addressing the legacy of underinvestment through sustained capital investment. UÉ charges non-domestic customers in line with the Non-Domestic Tariff Framework (NDTF) as approved by the CRU. Tariffs are calculated using the allowed revenue approved by the CRU and reflect increased growth and investment in UÉ’s network for the benefit of customers.

Sustained investment

The EPA commented that “at the current rate of investment in and development of water services infrastructure in Ireland, it will take decades before the requisite level of compliance and resilience will be achieved”. They noted that “securing the appropriate level of investment will be critical for UÉ to expedite the achievement of this ambition”. They recommended that Uisce Éireann “better articulate how greater advancements can be achieved in water services with significant sustained investment. Reference should be made to the capital investment planning process and how it should be used to secure greater investment for water services”.

Responding to the EPA, a key aspect of developing our Investment Portfolio for RC4 is the Outcomes that we aim to achieve during the RC4 period at the point in time corresponding to submission of the Capital Investment Plan to the CRU. The funding allocation creates uncertainty from a capital delivery perspective as there is no guarantee the level of funding will be sustained year to year. It has a distinct knock-on impact on our project and planning delivery, our ability to manage statutory processes, as well as some of our key stakeholders, contractors and suppliers who have urged for greater clarity and stability over our funding. The ability to prioritise and re-assign expenditure will be dependent on timing and availability of capital and capacity of the supply chain to absorb additional work.

6.5.9 Action 4.10: Secure multi-annual funding approach.

Summary of Action 4.10 Feedback

The CRU agreed with “the position set out by under Action 4.10, Secure Multi-Annual Funding Approach. Namely that stability and certainty of funding is required to efficiently meet the infrastructure development and maintenance needs identified for multiannual projects, and the investment ambitions of the WSSP 2050”. The CRU also welcomed “the ongoing work through the funding model working groups set up by the Department for Housing Local Government and Heritage (DHLGH) are soon to be concluded and the

decisions arising from this working group are intended to provide multi-year certainty in funding and ensure that funding is in sync with the CRU's regulatory model".

Funding model arrangements

The CRU noted that "in the context of the funding model arrangements currently in place, until any changes arising from the working group are implemented, Uisce Éireann should aim to develop solutions that best ensure long-term stability and predictability in its investment plan, to ensure timely and efficient investment delivery". They recommended that "Uisce Éireann include an action, to review and update as required, the systems it will enhance, develop and implement to embed a value for money mindset and drive economic efficiency. The CRU further recommended that Uisce Éireann "include an action to review and find suitable options and solutions on how it can minimise risks relating to the funding arrangements that are currently in place to fully deliver the ambitions of the WSSP". The CRU acknowledged that Uisce Éireann "will face challenges over the course of the WSSP 2050 in securing sufficient exchequer funding". Therefore, "it is imperative that Uisce Éireann become proactive in seeking opportunities to reduce costs where possible.

They would also like to see Uisce Éireann consider approaches to how it can improve its cost data recording and management. This would improve the available information for setting tariffs and develop a more robust understanding of customer behaviour. Where plans to improve cost data recording and management do materialise, these should include review timeframes as milestones over the course of the WSSP 2050". The CRU commented on the importance of accurate and robust data for better decision making. The CRU understands that Uisce Éireann has been on a journey to date to better understand the breadth and detail of its network assets and commented that now Uisce Éireann is in a stronger position to translate that data and knowledge into more informed decision making. CRU's submission also discussed their ongoing engagement with Uisce Éireann as part of their regulatory assessment to determine revenues for the next revenue control (2025- 2029). They acknowledged that Uisce Éireann expects a significant step-up in funding compared to the previous revenue control period and subsequently noted that "it is imperative that Uisce Éireann engages with the CRU to build on the current governance and reporting framework".

It is expected that the recommendations from the funding working group will be reflected in the next revenue control decision covering the period 2025-2029. UÉ has also undertaken a significant body of work to update policies, standard operating procedures, reporting, guidance, training, etc. to address the requirements of the Public Spending Code and the SSG. Substantial progress has been made in refining UÉ's investment planning and management processes as well as the Project Lifecycle framework to align to PSC and SWI's review to ensure effective

governance to the identified investments. The details of which are outlined in the RC4 submission. The CRU has also engaged an additional third-party review to verify implementation of SWI's review. Another key objective of this review was to provide UÉ with further implementable recommendations identified, with the intention of driving further improvements in UE's processes, systems and people.

Securing multi-annual funding

The Irish Home Builders' Association and Construction Industry Federation noted that Uisce Éireann “requires multi-annual budget certainty with ring-fenced funding for critical infrastructure” and “aim 14 should ensure this funding is secured directly for infrastructure delivery”.

Councillor Michael Cahill commented that a large investment would be required “to bring our water quality and treatment up to an acceptable level”. They noted that this investment was particularly important for the health of people and the natural environment. One individual discussed the issue of economic water scarcity in Ireland, the commented that there was still underinvestment in water infrastructure.

One stakeholder commented that Uisce Éireann must “ensure the government gives a guarantee of funding and Uisce Éireann control spending”. Other submissions noted that “Uisce Éireann must have multi-annual budget certainty, where critical capital infrastructural investment is ringfenced from leakage, Local Authority and general maintenance projects. A commercially viable operational model will be required to attract and retain water and waste water plant/infrastructure operators/recourses and allow the industry to develop, attract talent, apply the latest technology and innovate.”

Uisce Éireann agrees that funding in water services is critically important for public health and the environment. Uisce Éireann will spend €6bn on capital expenditure over the RC3 period 2020-2024, highlighting the Government's support for Uisce Éireann's capital investment plan and water services nationally to date. A further €10.2bn is forecast to be spent over 2025-2029, as included in Uisce Éireann's latest Strategic Funding Plan (SFP). The SFP is currently under review by the Minister for Housing, Local Government and Heritage. The National Development Plan provides a level of certainty around multi-annual capital funding. However, Uisce Éireann is eager for further operational and capital funding certainty in line with its regulatory period (5 years). This would facilitate multi-year project and programme planning and delivery with increased certainty, allowing our supply chain and contractor base to scale up appropriately. This would ensure we are not ramping up or down certain projects in line with available funding at short notice with the consequent risk of the supply chain redeploying resources to other projects in Ireland and the UK.

Funding Working Group

The Irish Academy of Engineering noted that the Plan's success depends on "economic and technical feasibility," suggesting "Uisce Éireann (UÉ) may struggle to meet its objectives due to its reliance on 80% central government funding". While technically feasible, they commented that "affordability / value for money is the primary constraint" on achieving compliant and energy-efficient water services infrastructure. "Without multi-annual and adequate funding, the necessary and essential improvements to our water services will not be made and existing infrastructure will continue to deteriorate." The submission suggested that "the working group established in 2024 to review funding should be given a published remit and publish its report to ensure stakeholders are aware of the funding requirements and constraints. The potential impacts of a failure to provide adequate funding needs to be quantified and communicated." The IAE also referenced Ireland's boom-and-bust economic cycles and the historical impact of these on capital expenditure on water services. They noted that the current funding model, which avoids direct household bills, places the financial burden on the Exchequer and reduces customer accountability for water consumption. This model also complicates compliance with the Water Framework Directive (WFD). The IAE are aware that funding decisions by the Commission for Regulation of Utilities (CRU) involve benchmarking to ensure resilience against unexpected challenges. However, they commented that the current model "reduces the accountability of the customer for the management of their consumption, a key issue from a water conservation perspective".

The IAE commented that the reference Section 7.6 of the Plan to certainty on funding availability on a multi-annual basis, particularly for high value multi-year projects, where Ministerial consents are provided on a phased basis, "is an important statement and one which should be given greater emphasis and included as one of the key challenges". The IAE also suggested a more flexible approach to managing operational and capital expenditures, allowing for better alignment with economic, environmental, and emissions objectives. They also recommended using a broader range of benchmarking data from other EU jurisdictions. They noted that Uisce Éireann's funding sources include equity, non-domestic charges, new connections revenue, and debt, but it remains cash neutral each year, relying heavily on the Exchequer. They further commented that this reliance leads to funding uncertainty, especially during unexpected operational cost over-runs, which can delay or defer projects.

Uisce Éireann have been engaged as part of the funding working group with the Department of Housing, Local Government and Heritage, Department of Finance, Department of Public Expenditure NDP Delivery and Reform, NewERA and the CRU. The final recommendations from the working group will be presented to the Minister for Housing, Local Government and Heritage

to consider. It is expected that the recommendations from the funding working group will be reflected in the next revenue control decision covering the period 2025-2029. Uisce Éireann are heavily reliant on funding from the Government, who have been very supportive to date, acknowledging the challenges that the annual Government Budgetary process brings. We are hopeful that the recommendations from the funds working group can bring multi-year funding certainty for future revenue controls in line with the regulatory model. This will in turn provide increased certainty for Uisce Éireann's supply chain and contractor base, with a clear pipeline of projects and programmes. Unexpected cost pressures can have an impact on project delivery (e.g., global energy crisis), with Uisce Éireann actively working with its regulator to embed inflationary type adjustments in its next revenue control decision (2025-2029).

Cancellation of contracts

Irish Business and Employers Confederation (IBEC) commented that “following the abolition of domestic water charges, and UÉ’s resultant 80% reliance on Exchequer subvention, the regulatory process has become more complicated and arguably subject to greater uncertainty”. They suggested that “the cancellation of contracts at short notice due to Exchequer funding failing to materialize should be avoided” and “a more robust funding framework would be aid in this”.

In response to Ibec Uisce Éireann is heavily reliant on Government funding, with the Government very supportive to date. There are aspects of the funding model that are currently challenging, particularly with regards to managing our funding at the end of year to remain cash neutral. This is being reviewed and discussed with the Government and CRU.

6.5.10 Conclusions on Strategic Objective 4

Having carefully reviewed the submissions received on Strategic Objective 4 Uisce Éireann have considered the following recommendations that should be provided in the WSSP 2050.

Recommendations on Strategic Objective 4

In response to Irish Home Builders' Association and Construction Industry Federation Action 2.7 of our WSSP explains that we follow a plan-led growth approach through our engagement with planning authorities. We have amended our glossary of terms to include Plan-led development.

6.6 Approaches to meeting long-term challenges

In this chapter, we summarise the key references in submissions to issues under Approaches to Long-term Challenges. We received 36 references in relation to Approaches to Long-term Challenges. Within the overall heading of Approaches to Long-term Challenges we have further categorised submissions under the four key approaches as identified in the draft WSSP 2050. We deal with each of these key approaches in this chapter, setting out first a summary of the relevant references in the submissions, followed by our response.

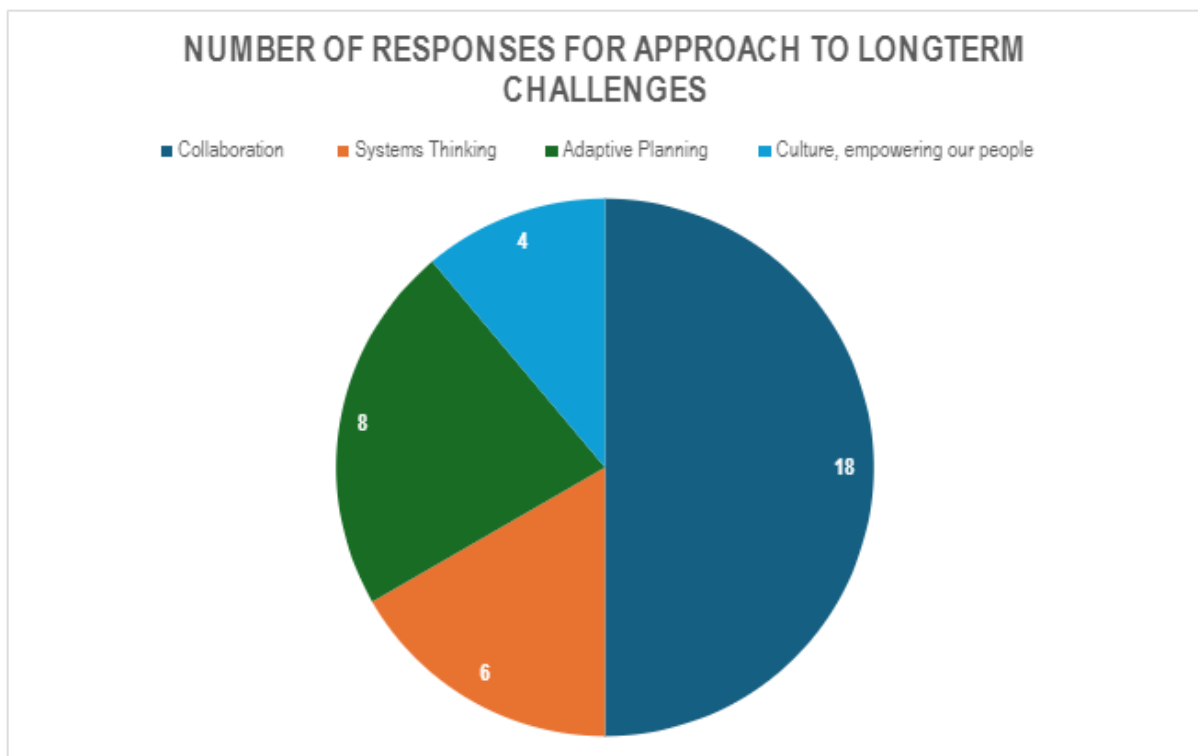


Figure 13 Number of Responses for Approaches to Long-term Challenges

6.6.1 Collaboration

Summary of Collaboration Feedback

Stakeholder engagement

The Office of the Planning Regulator acknowledged “the positive working relationship between the Office and Uisce Éireann and the thorough assessments Uisce Éireann carries out of local authority statutory plans in its day-to-day work”. Meath County Council cite their CDP, 2021-2027 to highlight “their commitment to work in conjunction with Uisce Éireann in the provision and upgrading of water and wastewater services in the county”.

They further noted that they will continue to work with Uisce Éireann on meeting the objectives of the National and Regional Plans.” Louth County Council noted concerns in relation to the impact of the draft WSSP 2050 on the potential growth of Drogheda and Dundalk and requested a meeting with Uisce Éireann to discuss the Plan in respect of these concerns. The CRU acknowledged that Uisce Éireann understands the importance of robust planning and scoping to deliver on the ambitions contained within the WSSP. They requested that Uisce Éireann continue to engage with and further develop closer collaboration with the Environmental Protection Agency and An Bord Pleanála, to ensure the delivery of capital programmes that can meet the future needs of the economy and customers. The CRU also welcomed Uisce Éireann’s commitment to working closely with developers and other stakeholders to streamline processes. They commented “early engagement with these stakeholders ensure efficient processes are in place and network capacity is available to meet demand and ensure security of supply. The Irish Academy of Engineering (IAE) noted that Uisce Éireann has a well-developed structure, teams and strong technical capacity but also highlighted challenges posed by the current funding model. The IAE further noted that ensuring that all the Uisce Éireann stakeholders collaborate will be a major challenge”

Uisce Éireann are committed to building on our current engagement and collaboration as we deliver on the actions and approaches set out in the WSSP 2050. We have developed and fostered collaborative working relationships with all our external stakeholders and value their views and input into our projects and plans. To ensure that we work with and listen and learn from our stakeholders we run numerous consultations on projects and plans, facilitate workshops, briefings and meetings to gain insights and greater understanding of stakeholder views. We will continue to work closely with all stakeholders and in particular with our colleagues in the Local Authorities to deliver water services for Ireland. Across Uisce Éireann we work in partnership with all the Local Authorities to deliver water services for Ireland. We will continue to build on these relationships at the local level in each county with each Local Authority.

We are committed to building on our current engagement and collaboration with all stakeholders as set out in the WSSP and will continue to consult, liaise and work with these stakeholders on our projects and plans. Through working collaboratively with key stakeholders, we believe that we can deliver outcomes for Ireland more effectively, efficiently and faster than if we were working in isolation. We advocate for this “Team Ireland” approach wherever it can deliver value for the country. In our WSSP 2050 we identify collaboration as an important delivery approach to ensure the sustainable delivery of water services for Ireland. We have a dedicated connections and Developer Services team for domestic and non-domestic customers who apply for new connections to the public network. Our Strategic Aim on “Providing for Growth” is supported by actions involving collaboration with our key stakeholders to support planning policy and housing and industry development. We are also committed to and

understand the importance of engagement with other infrastructure providers as we plan and deliver new and upgraded services.

We set out our approaches to working with our stakeholders to secure long term funding under Strategic Aim 14 of the WSSP and have discussed in further detail in our responses to Action 4.9 and Action 4.9 above.

Data sharing with stakeholders

Both An Fórum Uisce and An Taisce welcomed Uisce Éireann “commitment to collaborate with stakeholders to achieve the best environmental outcomes, including the open sharing of data with stakeholders and the development of shared catchment models to assess measures to meet WFD objectives. An Forum Uisce, An Taisce, Tipperary County Council and LAWPRO recommended that open-source data be made available to the public to enhance transparency and allow others to incorporate it into their plans. An Forum Uisce also recommended that specific commitments are implemented to make project details, timelines and expected outcomes transparent and available to stakeholders and the public in a timely manner, as well as the requirements and compliance with the urban wastewater treatment Directive or the Water Framework Directive.

We welcome this comment by An Forum Uisce, An Taisce, Tipperary County Council and LAWPRO. Uisce Éireann is in the early stages of its data maturity journey. However, during the course of this Water Services Strategic Plan 2050, it is committed to embracing the requirements of the EU Open Data Directive's High Value Datasets (HVD). Uisce Éireann is cognisant of the of the requirements of the Directive in regard to HVD's. These datasets are defined as documents, the re-use of which brings significant benefits for society, the environment, and the economy. As outlined in Article 14 of the EU Open Data Directive, the identification of specific HVDs is based on their potential to:

- *Generate significant socioeconomic or environmental benefits and innovative services.*
- *Benefit a high number of users, particularly SMEs.*
- *Assist in generating revenues.*
- *Be combined with other datasets.*

Uisce Éireann has already begun publishing elements of its data on our website and linking it to the Open Data portal. As our confidence in the data grows, we remain committed to publishing more HVDs.

Furthermore Uisce Éireann is exploring innovative uses of technology to support investment and management decisions to protect the environment, enhancing the utility of open data. While this approach requires further detailed assessment, it demonstrates our commitment to enhancing

data usage for strategic decision-making. As our digital and data capabilities grow, we will look to integrate these initiatives to enhance our environmental stewardship and data transparency.

WSSP Presentation

An Forum Uisce also noted that the Plan contains a lot of industry jargon and recommended that engagement or collaboration with the general public be in plain English to build trust between communities and UÉ.

We will review the WSSP to simplify wording where appropriate in line with An Forum Uisce recommendation. We have also added a number of terms to the glossary.

Collaboration between service sectors

Transport Infrastructure Ireland noted in the future implementation of the Water Services Strategic Plan 2050, they expect there will be numerous locations where potential schemes will interface with the existing and future national road and light rail networks. They further acknowledged that their “existing liaison relationship with Uisce Éireann has proven to be a constructive platform to discuss complementary objectives and projects” and requested that the Plan highlights the agreed development and coordinating mechanisms to ensure an integrated approach is achieved for further implementation between Government agencies ESB noted many areas where existing collaboration between their entity and Uisce Éireann could be expanded such as water supply and demand, customer engagement, planning for and delivering critical infrastructure, protecting the environment, promoting biodiversity, achieving net zero emissions from operations and innovation. ESB stated they are “keen to ensure that we have a deep and impactful relationship with Uisce Éireann and to ensure that synergies are identified and actioned”.

In EirGrid’s submission they referenced the Grid Implementation Plan 2023-2028, in particular Policy PDP5 which explicitly references collaboration between state agencies. There noted that there is “clear benefit for EirGrid and Uisce Éireann to engage in collaborative strategic planning of their infrastructure” and suggested that reference to such collaboration between state authorities would be a useful insert into the Plan, and also into the SEA documents. They further stated that EirGrid would welcome further direct engagement with the WSSP team to explore strategic collaboration and how this might be best underpinned by respective policy and planning documents. Gas Networks Ireland acknowledged that collaboration will be an important factor in delivering the WSSP. They cite Action 14 from the National Hydrogen Strategy and noted that the “delivery of this Action will require extensive collaboration between Gas Networks Ireland, Uisce Éireann, EirGrid, ESB and others”. They go on to note that the Hydrogen Strategy and the potential to collaborate with Gas Networks Ireland on biomethane projects, enables Uisce Éireann to

fulfil their commitment to “collaborate with stakeholders to deliver outcomes for Ireland which could not be achieved while working in isolation”.

We are committed to building on our current engagement and collaboration with all stakeholders including EirGrid Gas network, ESB and EirGrid. Uisce Éireann works in collaboration with organisations across Ireland to foster cohesive working arrangements when planning and delivering our projects. We work with organisations such as the ESB, TII, Irish Rail/CIE, Waterways Ireland, EirGrid, Inland Fisheries Ireland, the OPW, Local Authority Roads Departments, GNI in a number of forums. Where opportunities present themselves, we work together and meet regularly to discuss projects and plans. An example of this collaborative way of working is Uisce Éireann’s membership of the Dublin Infrastructure Forum Technical Working Group, which coordinates the planning, development, implementation, and monitoring of various government and state-sponsored projects. The forum includes representatives from EirGrid, DAA, TII, NTA, Irish Rail, GNI, ESB, DCC, Waterways Ireland, and the Dublin Local Authorities.

Uisce Éireann and ESB teams meet regularly and have established good working relationships. We will continue to develop and build on these relationships to ensure that both organisations work collaboratively to deliver the best outcomes for water supply and demand, customer engagement, planning for and delivering critical infrastructure, protecting the environment, promoting biodiversity, achieving net zero emissions. We are committed to building on current engagement with Gas Networks Ireland to ensure we work together on a more sustainable Ireland. We intend to collaborate with key stakeholders to determine UÉ’s role in the national hydrogen strategy. The aim of the HyWater UÉ | ESB collaboration is one initiative that will progress our understanding some of the technical, economic and regulatory challenges and opportunities to inform our decisions and role.

Uisce Éireann welcomes EirGrid’s submission on the draft WSSP 2050 and is committed to building on the existing relationships in place between the two organisations. Uisce Éireann works in collaboration directly with EirGrid to foster cohesive working arrangements when planning and delivering our projects.

Collaboration for Integrated Catchment Management

LAWPRO acknowledged that collaboration is essential to the success of the plan and their submission encouraged increased collaboration between Uisce Éireann, national bodies such as Inland Fisheries Ireland and local authorities particularly in the development of through the integrated catchment management approach. Tipperary County Council agreed with the necessity of collaboration as outlined in the Plan. They noted that “greater investment and coordination with other State agencies in progressing integrated

catchment management is required to ensure clean and sustainably managed water supplies”.

We work closely with many organisations such as LAWPRO, ASSAP, NPDWA, and local authorities to protect water sources. We aim to raise awareness of the potential impact that activities in water catchments can have on our drinking water. We already have a number of plans and projects in place to help protect our water sources catchments such as E the Drinking Water Safety Plan approach, our Interim Pesticides strategy, and the Erne-Larah Water Source Projection Project. Uisce Éireann continues to engage within the RBMP three-tiered governance and implementation structure, the purpose of which is to ensure an integrated and cooperative approach to developing and implementing river basin management plans. The requirement in the Water Action Plan 2024 for the development of 46no. Catchment Management Work Plans will further facilitate an integrated catchment management approach by bringing together Sectoral Action Work Plans from each sector at water body scale. Uisce Éireann is developing Sectoral Action Work Plans in relation to urban wastewater, drinking water source protection, abstractions and water treatment plants.

Protecting water sources helps sustain the water we drink and the environment. We work with stakeholders to protect rivers, lakes and groundwater from harmful activities and substances. We provide recommendations to stakeholders on how they can protect water sources for the following activities:

- *Afforestation and tree felling peatland restoration*
- *Wind farms*
- *Exploration drilling*
- *Housing and domestic*
- *Wastewater treatment systems*
- *Quarries and landfills*

Collaboration with IDA

IDA Ireland expressed interest in exploring “strategic partnerships with Uisce Éireann to contribute to the efficiency and resilience of Ireland's water sector”.

Uisce Éireann welcomes IDA's submission and interest in exploring strategic partnerships with UÉ. We will continue to build on the existing relationships in place to support growth and development in Ireland with more resilient water services for the country.

6.6.2 Systems Thinking

Summary of Systems Thinking Feedback

“One Health” concept

Several submissions, including those of Gleann a’Phuca, Cork Rivers Group, Green Spaces for Health and a member of the public, noted that the draft Plan does not consider the concept of One Health which can be applied to the enhancement of water services. We welcome the comment by Gleann a’Phuca, Cork Rivers Group, Green Spaces for Health and a member of the public. We support the One Health model which is based on effective communication, coordination and collaboration across sectors and disciplines to address the interlinked issues of the health of people, animals and our shared environment.

Section 8 of our Water Services Strategic Plan 2050 recognises the importance of this integrated approach to managing our water services. We commit to applying a ‘systems thinking’ and ‘collaborative’ approach to meeting long-term challenges such as climate change and the biodiversity crises. Several of our strategic aims and actions in our draft plan outline this commitment. For example, under Strategic Aim 1 (Ensuring safe drinking water) and Strategic Aim 9 (Contributing to positive biodiversity) we acknowledge that collaboration with public agencies and catchment stakeholders is a key enabler to protect and improve our drinking water sources, enhance biodiversity, treat wastewater and provide amenity benefits; and under Strategic Aim 3 (Conserving our precious resources) we recognise opportunities for rainwater harvesting and the circular use of water, which can reduce stormwater flows entering our combined sewer system and reduce abstractions from our sources waters.

Protection of shellfish waters

BIM noted that “mobilising useful discussions at ROC level into actions and positive changes on the ground is slow and given the statutory nature of the requirements could be accelerated with the use of enforcement where awareness raising, and encouragement have failed to deliver impactful change”. They also noted that given the integration of the SWD into WFD and that a waterbody cannot be allowed to deteriorate, there will be an increased challenge to comply with this evolving directive. BIM also commented that the lack of explicit reference to Shellfish Waters Directive concerns if the plan is to address the changes to water quality up to 2050.

We welcome this statement by BIM. With regards to mobilising useful discussions at ROC level into actions, we understand that the terms of reference of the committees are being reviewed to enhance their role with respect to knowledge sharing and the identification of issues and solutions at regional and local level. We are committed to working within all levels of the RBMP

governance and implementation structure to ensure optimal implementation of the Water Action Plan 2024. and changes on the ground is more relevant to the EPA and their role as the regulator to enhance and streamline this process. We are committed to compliance with WWDA authorisation conditions related to protection of shellfish waters as well as RBMP measures. The shellfish waters directive has been repealed, shellfish waters now fall under the Water framework directive, hence we have only referenced this directive which includes objectives for shellfish waters through their inclusion in the WFD Register of Protected Areas.

6.6.3 Adaptive Planning

Summary of Adaptive Planning Feedback

Gas Networks Ireland supported the concept of adaptive planning. They commented that to meet climate and energy targets, all organisations will need to resource appropriately, work with agility and embrace more streamlined decision-making processes. They also noted that geopolitical tensions and climate change make predicting future resource demand challenging. They agreed with Uisce Éireann that in order to “best mitigate against this uncertainty, organisations will need to develop more sophisticated models and scenarios which are continuously updated”.

We welcome GNI submission, we are committed to adaptive planning. We will continue to build on the work done as part of our Vision 2050 project to develop and implement foresight and horizon scanning capability to support our planning processes. This will help us understand how trends affecting the water sector and our service provision are evolving. We are keen to work collaboratively with other stakeholders in developing our foresight capability, for example through shared insights into future population trends. This collaborative approach will help us ensure that we are delivering value for Ireland and build trust and confidence with customers and communities.

Adapting to Challenges

The Irish Academy of Engineering highlighted that any delays in meeting standards can result in fines by the EU and constitute a risk to consumers. To mitigate this, they recommended that risk assessments be completed and regularly updated “to illustrate the direct and indirect costs of failures and their impacts on the health and standards of living of consumers”. The IAE also acknowledged the challenge of ageing infrastructure but noted that greater investment and ambition is required.

We welcome the comment by the Irish Academy of Engineering. We set out our risk value-based decision-making approach in action 4.6, this includes consideration of legislation. Our approach

to risk management is also detailed in our response to submission raised under Action 4.5 above. Infrastructure provision is noted as a key challenge in section 2 of our WSSP.

Population growth and migration

The Irish Home Builders' Association and Construction Industry Federation noted that the Plan refers to adaptive planning to as relating to “population increases resultant from climate migration, however, there is no reference of the population increases that Ireland is currently facing excluding from climate migration”.

Section 2 of the WSSP mentions that Ireland's growing population, economic growth and the additional growth resulting from climate migration are key challenges. We have clarified this point in the Executive Summary of the WSSP to include a reference to population growth outside of that caused by climate change.

New/Emerging legislation

The EPA noted the recognition of changes to legislation as a key challenge in the WSSP however they commented “there is little reference to the scale of the challenge associated with this new legislation T The continued on to state, “there is no mention of new pieces of legislation such as the Critical Entities Resilience Directive which is due to be transposed in October 2024”. They commented that Uisce Éireann will potentially be designated as a ‘Critical Entity’ as it provides essential services in the water and wastewater sectors. The EPA recommended that Uisce Éireann consider horizon scanning for new legislation and how they will consider the implications of new legislation as part of their regular reviews of the WSSP.

New and emerging legislation such as the drinking water directive, proposed Urban wastewater treatment directive, new abstraction legislation, critical entities directive and other future legislation will have significant implications for Uisce Éireann. Legislation, regulation and policy are included as a key challenge in our WSSP in Section 2 and we have enhanced the text to reiterate the challenge posed including referencing the recast UWWTD. We are also actively engaging with the Department on the implementation of this legislation and are members of the department's expert group. Uisce Éireann are aware that we will potentially fall within the scope of the new Critical Entities Resilience Directive for both Water and Wastewater. We have had engagements with both the DHLGH and the Department of Defence (CER Group) in relation to the directive. Ahead of transposition into primary legislation in October, we will shortly commence our own internal assessments to determine any impacts to our existing resilience models. Our WSSP includes an Action 4.8: Continue to develop foresight and horizon scanning capability. This

will include horizon scanning for new and emerging policy, which will be considered as part of the WSSP review.

6.6.4 Building our culture, empowering our people

Feedback

Summary of Building our culture, empowering our people Feedback

Resourcing

Irish Home Builders' Association and Construction Industry Federation suggested resourcing should also be considered a challenge from a staff and funding perspective. The submission noted "there is some reference to investing in staff, but consideration should be given to funding contractors and committing to increased resources to undertake major infrastructure projects (capacity). They suggested this challenge be considered and actions identified to overcome this. The submission goes on to discuss how Uisce Éireann should "adopt a commercially viable model to attract and retain skilled operators and implement advanced technologies so that the industry can develop, innovate, attract talent and implement leading technologies". Both the EPA and Ibec commented that the challenge "to build and harness a safe, diverse and inclusive culture, in which staff are empowered and high performing" is understated in the draft WSSP. The EPA maintained that "recruiting and retaining competent staff with the appropriate levels of technical expertise will be key for the operation and maintenance of the utility". Ibec argued that achieving this vision in a timely fashion will be easier if the transformation to a Single Public Utility model is successfully completed by the end of 2026. A private individual stated via the feedback form: "Uisce Éireann must put in place a commercially viable operational model to attract and retain water and waste-water infrastructural operators/resources so that the industry can develop, innovate, attract talent and implement leading technologies".

We welcome comments by Irish Home Builders' Association and Construction Industry Federation, the EPA and IBEC. We address this in Action 4.10: need for certainty in multi-annual funding to enable the supply chain to scale up. Uisce Éireann is on a journey to become a single public utility. Water and wastewater services employees from across 31 Local Authorities will complete transfer to Uisce Éireann by December 2026. In recognition of the importance of harnessing a safe, diverse, inclusive culture, where our people are empowered and high performing, a multi-year programme of work is underway to help define and embed a positive culture for a unified organisation, which encompasses all Uisce Éireann staff, and which employees from all levels of Uisce Éireann, including our water services colleagues coming from the local authorities, help to create.

We are managing the careful transition of people and transforming core ways of working to improve services to our customers and communities, while meeting our regulatory and legal obligations. We are working towards having a fit-for-purpose organisational structure with the optimum mix of field force employees i.e., employees working in treatment plants and on the networks e.g., plant operators, and support structures across Operations and the wider organisation. We are standing up a range of new teams in Operations that will deliver greater efficiencies e.g., Stores and Inventory (manage regional stores), Scheduling and Dispatch (scheduling of work centrally), and will focus on critical areas e.g., Asset Interventions and Technical Operations (carry out operational, capital and planned maintenance) and Waste Operations (manage waste management to prevent pollution to the environment).

Uisce Éireann is focused on retaining and attracting employees into critical roles in Operations to deliver the optimum service nationally. We are committed to attracting, retaining and developing employees at all levels of the organisation, in both operational and support roles, to deliver the optimum service nationally. In addition to the delivery of critical health and safety training, all operations staff may avail themselves of a comprehensive suite of training, based on role-based curricula, and encompassing both technical and competency-based offerings. Uisce Éireann continues to invest in enhancing and increasing the availability of all relevant training and learning offerings to ensure that all staff have all requisite skills and abilities. In building a talent pipeline for the future, Uisce Éireann invests in hiring early careers professionals on an ongoing basis.

We have a well-established Uisce Éireann Graduate Programme which sees a wide range of graduates of diverse professional disciplines, including a strong focus on Graduates of STEM courses, who join the organisation from a multitude of third level institutions across Ireland and beyond. Plans are also in place to commence the offering of Apprenticeship and Trainee programmes, with areas of focus including Instrumentation Control Automation and Water, Wastewater Treatment and Leak Detection with the aim to attract and develop a pipeline of skilled employees for current and future roles nationwide. All relevant employees will be equipped with and trained in the use of the technology and tools for their role e.g., mobiles devices, safety equipment, fleet and machinery. We are deploying the new enterprise telemetry system to increase oversight of the Water and Wastewater treatment plants. We are making good progress and plan to have oversight of all water and wastewater plants in the coming years.

A fit-for-purpose organisational structure, fully resourced with the right skills and capabilities, optimal ways of working, with improved technology and tools will equip Uisce Éireann to deliver safe, customer centric, quality services. Our intention in the WSSP is to work for a commercially viable operational model to attract and retain water and waste-water infrastructural

operators/resources so that the industry can develop, innovate, attract talent and implement leading technologies.

Procurement process

Ibec commented that Uisce Éireann's infrastructure will require unprecedented levels of investment for several more years. They noted that new approaches to the procurement of public works projects and programmes should be rolled out and the efficiency and effectiveness of such be consistently monitored. They further noted that "operational effectiveness may also depend on different contracting models to deliver and/or operate capital projects (e.g., DBO-type contracts)" and these must not be affected by the terms of a future referendum on public ownership.

We welcome this comment by the IBEC. To efficiently and effectively deliver ambitious delivery requirements, UÉ already has in place a number of key frameworks, contracts, and programmes of work to ensure successful outcomes and maximise value for money. These contracts are continuously managed and monitored. UÉ also collaborates regularly with our suppliers, other peer organisations, and the Office of Government Procurement to develop ever-improving methods to deliver its capital investment programme and build a robust and sustainable supply chain to support it. We don't foresee any negative impact from a future referendum on public ownership, as we are already a national public utility.

6.6.5 Conclusions on Approaches to Long-term Challenges

Having carefully reviewed the submissions received on Approaches to Long-term Challenges Uisce Éireann have considered the following clarifications should be provided in the WSSP 2050.

Clarifications on Approaches to Long-term Challenges Feedback

Glossary - In response to An Forum Uisce's comment that the plan contains a lot of industry jargon, we have reviewed the WSSP to simplify wording where appropriate. We have also added the following terms to the glossary: Asset lifecycle, Plan-led development, and Water services.

Executive Summary - Section 2 of the WSSP mentions that Ireland's growing population, economic growth and the additional growth resulting from climate migration are key challenges. We have clarified this point in the Executive Summary of the WSSP to include a reference to population growth outside of that caused by climate change.

Section 2 - We have enhanced the text in Section 2 to emphasise the challenge posed by changing legislation, including referencing the recast UWWTD.

6.7 Implementation

In this chapter, we summarise the key references in submissions to issues under Implementation. We received 17 references in relation to Implementation. We set out first a summary of the relevant references in the submissions, followed by our response.

6.7.1 Summary of Implementation Feedback

The Office of the Planning Regulator in their submission welcomed “the acknowledgement of the role that the statutory planning policy framework at all levels, among other policy documents, will play in the implementation of the draft Strategy.” The submission noted that the draft Strategy also positively addresses the UN Sustainable Development Goals and how they relate to the draft Strategy.

Implementation

The submission by An Fórum Uisce and the Northern and Western Regional Assembly suggested an implementation plan be developed for the actions contained within the WSSP with the necessary governance arrangements needed to ensure that the actions are implemented in a timely and transparent manner. As the WSSP progresses, the CRU expressed interest in the targets that Uisce Éireann will put in place, to achieve the critical actions and the commitments stated. The CRU is also “keen to see how shorter-term action plans following on from the WSSP 2050 will target how Uisce Éireann will prioritise and tackle both long standing and emerging needs” A stakeholder said there is a lack of detail in the WSSP draft on how the strategy's aims will be achieved. IAE suggested development and monitoring of annual KPI's. Targets and milestones together with robust monitoring and bi-annual review. IAE noted the importance of resourcing or the successful delivery of the WSSP. They also requested more detail in the plan, including listing all implementation plan and making recommendations for Tier 2 implementation plan. They also requested a strategic oversight group to carry out regular reviews of the plan. An individual stakeholder commented they would like to see more tangible commitments in the WSSP and outlining the consequences if not achieved. They also requested development of 5-year plans.

The Water Services Strategic Plan is a high-level national plan. The implementation of the WSSP will be through lower tier plans such as the National water Resource Plan, the future Wastewater Strategy Framework as well as other strategic documents. The monitoring of these plans will be quite detailed. We can confirm however that we will be monitoring delivery of actions throughout the lifetime of the WSSP which will be reported on through the five-year review. We will track the progress of these actions annually. In parallel, we will monitor emerging challenges and opportunities and develop our foresight and adaptive planning capability, as set out in Section 8 of the draft WSSP.

The combination of our action and foresight activities will inform and facilitate the review of the WSSP that we are required to carry out at 5 yearly intervals under Section 33 of the Water Services (No. 2) Act 2013 (as amended).

We set out our approaches for meeting long term challenges within Section 8 of the WSSP 2050. This includes building our culture and empowering our people which is a key enabler for delivery and resourcing of the WSSP 2050. We discuss this in more detail in Section 8 of the WSSP 2050 and under our responses to Section 8 above.

Governance & compliance framework

The CRU suggested that to deliver the overall ambition as set out in the draft WSSP 2050, Uisce Éireann will need to continually review and adapt its current and future Governance and Compliance framework, through various phases of its WSSP 2050 to successfully deliver on the 25-year strategic plan. The CRU recommended that Uisce Éireann include an action under Section 9.2 Implementation to review the current Governance and Compliance framework and submit to the CRU for consideration, improvements that can be made to ensure relevant stakeholders are provided with the necessary assurance. The CRU recognised that Uisce Éireann is tasked with the delivery of major capital projects under the National Development Plan and comment that Robust Risk Management, Stakeholder Management, Project Management and Reporting will be critical to their success. They noted the importance of an appropriate, agreed Governance framework when facilitating the delivery of these projects in an agile, cost-efficient, and time-efficient manner around value for money and project delivery. The CRU submission further outlined they will undertake a benchmarking exercise as part of its Revenue Control 4 process and is likely to continue with this approach as part of the regulatory review process Using the targets through RC3 and RC4. The CRU is keen to see the measures that Uisce Éireann has taken and will take going forward to use the benchmarking exercises to make tangible and reportable improvements.

We welcome CRUs submission. We have included details of our governance framework within our RC4 documents and welcome CRU's benchmarking exercise as part of RC4. Our 5-year investment plan from 2025-2029 is due to the CRU in 2024. We provide further detail on the investment plan in section 9 implementation.

Responsibilities for water services and water management

Gleann a'Phuca, Cork Rivers Group, I requested that Uisce Éireann “implement a plan for simplification of systems and bureaucratic complexities to future proof water services for more accessibility and meaningful engagement with local communities.” They continued to

note that “it would be important to enhance clarity for the public with regards to the different responsibilities for our water across Irish Water, the Environmental Protection Agency, LAWPRO and local authorities.”

Uisce Éireann is committed to engaging with our customers across all aspects of the services we provide, from the day-to-day delivery of water and the treatment of wastewater to the planning and delivery of projects and plans. We have a dedicated customer care centre as well as project teams that liaise with customers on the services and projects we carry out. We understand the importance of engagement and we are reviewing the feedback in the submissions on the draft WSSP 2050 which have highlighted the need for increased community engagement. Our commitment to engaging with communities is set out under action 2.4, we have further enhanced this action on the back of feedback from stakeholders, with our ambition to educate 1 million people.

We have provided further detail on roles and responsibilities for delivery of Water Services below

These following regulatory frameworks ensure that Uisce Éireann operates efficiently, aligns with national policies, and meets the required standards for water services in Ireland.

- **Economic Regulator:** *The Commission for Regulation of Utilities (CRU) protects customer interests and approves the necessary funding for Uisce Éireann to deliver services efficiently.*
- **Environmental Regulator:** *The Environmental Protection Agency (EPA) sets standards and enforces compliance with EU and National Regulations for drinking water supply and wastewater discharge. The EPA also liaises with the Health Services Executive on public health matters.*
- **Other Regulatory Bodies:** *Uisce Éireann is also regulated by other statutory and regulatory bodies such as Inland Fisheries Ireland, the Data Protection Commission (DPC), An Coimisinéir Teanga, and the Health and Safety Authority (HSA).*
- **Government Oversight:** *The Department of Housing, Local Government and Heritage (DHLGH) and the Department of Expenditure, National Development Plan Delivery and Reform (DENDPDR) provide financial and commercial advice and oversee UE's operations.*
- **An Fóram Uisce – National Water Forum:** *Established in June 2018, this statutory stakeholder body advises the Minister on water policy and management in Ireland.*
- **Houses of the Oireachtas:** *Uisce Éireann reports to the Department of Housing, Local Government and Heritage and engages with the Committee on Housing, Local Government and Heritage. The Comptroller and Auditor General audits UE's financial statements and reports to the Houses of the Oireachtas.*

The following is the governance and implementation structure established for implementation of Ireland's river basin management plans, which was first introduced for the second cycle of river basin management planning under the Water Framework Directive. The River Basin Management Plan for Ireland 2018 – 2021 introduced reformed governance structures and arrangements for implementation of the plan. This structure formally sets out arrangements for integrated and co-operative working relationships between the relevant public bodies. Uisce Éireann plays a role within this structure, both through membership of various committees and as an implementing body. This structure fosters a collaborative approach and facilitates knowledge transfer between different levels of oversight and decision making. LAWPRO works with community groups to support the work already being done to promote better water quality and encourages more groups to get involved. Community involvement is key to the protection and management of local water bodies. We work with LAWPRO bi-laterally through our common engagement in the implementation structure. Further information can be found at the Local Authority Waters Programme Water Framework Directive⁹ and Catchments Water Framework Ireland's Water Framework Directive regional governance structures – what do they do.¹⁰

Stakeholder engagement

Councillor Peter Melrose welcomed future opportunity for councillors and Kildare county council to constructively engage on the WSSP

We welcome Councillor Melrose feedback, as an organisation we have regular engagement with LA's and elected reps on all services and plans we work and deliver on.

Regulatory reports

The EPA commented that the WSSP fails to reference the use of EPA reports/priority lists to inform their planning process. They requested that “this section of the WSSP and the associated infographic needs to be amended to reflect how UÉ use EPA reports/priority lists to inform their strategic thinking.” They also asked that this section reference how the WSSP integrates with other national strategies to ensure a more holistic basis for an integrated plan, in the context of a circular economy.

In response to the EPA, we have included additional references to the priority urban areas and remedial action list under Strategic Objective 3 and 1, respectively. We also discuss the EPA's annual reports and both lists under section 9.2 how we will measure progress. In Figure 9.1 we

⁹ <https://lawaters.ie/water-framework-directive-governance-in-ireland/>

¹⁰ <https://www.catchments.ie/irelands-water-framework-directive-regional-governance-structures-what-do-they-do/>

list some of the key national strategies and plans that interact with the WSSP, we will include reference to the circular economy strategies.

6.7.2 Conclusions on Implementation

Having carefully reviewed the submissions received on Implementation Uisce Éireann have considered the following clarifications that should be provided in the WSSP 2050.

Clarifications on Implementation Feedback

Section 5.3, Action 2.4 – We have enhanced this action with our ambition to educate 1 million people on the value of water by 2030.

Section 4.2, Action 1.1 and Section 6.3, action 3.5 – we have added additional references to the priority urban areas and remedial action list.

Figure 9.1 – We have updated the figure to reference the ‘Whole of Government Circular Economy Strategy 2022-2023.

6.8 SEA

6.8.1 Summary of SEA Feedback

Biodiversity actions & mitigation for existing operations

The Department of Housing, Local Government and Heritage notes that “it is imperative that any positive biodiversity actions are appropriate to the location with appropriate ecological advice available at all stages in the project; the design stage, the implementation stage and the subsequent monitoring,” and emphasises the importance of monitoring biodiversity projects in supporting the NBAP. “Monitoring biodiversity projects is essential and will be required to support objective four of the NBAP, “Enhance the Evidence Base for Action on Biodiversity”.

“The Department recommends updating the ER, Table 9.2-Draft Monitoring Plan, under the SEA topic for biodiversity to include a commitment to ensure compliance with the legislative requirement to monitor and report on the actions undertaken for biodiversity, in accordance with the Wildlife (Amendment) Act 2023.”

The Department also made recommendations for the NIS in relation to “additional mitigation measures required to ensure the protection of European sites due to existing operations. This also needs to be taken into account in the SEA and the Monitoring Plan.

In response to the Department of Housing, Local Government and Heritage comments which emphasise the requirements of the NBAP, we note that the NBAP and UE's BAP are specially referenced and inform the SEA and WSSP 2050. An amendment has been made to SEA Environmental Report, Table 9.2-Draft Monitoring Plan, under the SEA topic for biodiversity to clarify that this includes a commitment to ensure compliance with the legislative requirement to monitor and report on the actions undertaken for biodiversity conservation, in accordance with the Ireland's 4th National Biodiversity Action Plan 2023–2030 as required by Wildlife (Amendment) Act 2023.

Action 3.3 of the WSSP has been amended to manage our water service assets and operations to reduce the risk of impacts to water bodies. Uisce Éireann will manage water service assets and operations to mitigate the potential pollution threats to water bodies. This involves conducting risk assessments including Site Spill risk assessments for WTPs (prioritised for sensitive sites such as SACs), implementing preventative measures, and enhancing contingency plans and incident response processes. The Uisce Éireann approach aims to improve the resilience of our operations and protect the environment. The SEA Environmental Report has also been updated to reflect the Action amendment to reflect the commitment set out on WTP risk assessments and

prioritisation and takes these through to the SEA Environmental Action Plan and monitoring plan.

Providing for growth

Irish Home Builders' Association and Construction Industry Federation welcomed “the references made to forthcoming policies and legislative changes, including the Planning and Development Bill, the National Development Plan and the National Planning Framework – Project Ireland 2040” in the SEA. The submission stated that it is “vital that services provide for this growth, and support housing delivery (as emphasised throughout this submission).” The submission welcomed the inclusion “of “Population, Economy and Tourism and Recreation” within the SEA, and agree with the challenges referenced here. However, further reference should be made to how these challenges will be addressed and overcome.”

The EPA noted the following under Strategic Environmental Assessment of the draft Water Services Strategic Plan. In the EPA's submission under Wastewater considerations, they referenced their “Water Quality in 2022 – An Indicators Report (EPA, 2023)” which highlights that “one of the key causes of water pollution is from point sources including discharges from wastewater treatment plants. The need to provide and maintain adequate and appropriate wastewater treatment infrastructure to service zoned lands and proposed developments is critical”. They commented that “while Uisce Éireann indicates that it will work with stakeholders to plan forward for capacity, it should specifically note that this planning is done within the constraints of the local receiving environment and in compliance with existing legislative requirements, including those under the WFD to prevent deterioration of water body status”.

In regards implementation and coordination, the EPA noted that “it will be critical that clear communication structures are established and maintained, so that in implementing the Plan, opportunities to avoid conflicts with other related sectoral policy commitments (e.g., tourism and local authority land use planning) are considered”.

EirGrid considered that “explicit reference to such collaboration between state authorities (possibly naming EirGrid and others), would be a useful insert into the Plan, and also into the SEA documents”. They continued this point stating that this “will allow for the sustainable provision of infrastructure, perhaps in shared corridors, in the context of good planning practice, minimising impact on receiving human and natural communities and the wider natural, human and built environments, and the principles of proper planning and sustainable development”.

In relation to the challenges identified in the SEA ER sections on Population, Economy and Tourism and Recreation Uisce Éireann note that actions to address challenges are identified in section 2 of the Plan and are reflected in section 7.3 and 7.6 of the SEA ER.

In response to the EPA's comments on the commitment to work with stakeholders has been further clarified across plan actions in relation to Uisce Éireann working with stakeholders to plan forward for capacity, this planning will be undertaken with consideration of the constraints of the local receiving environment and in compliance with existing legislative requirements, including those under the WFD to prevent deterioration of water body status and this approach is consistent with the SEA objectives and with WSSP 2050 strategic aims.

High status / Blue Dot sites / Freshwater Pearl Mussel

The submission by Tipperary County Council noted “there is reference within the environmental reports to European site designations, but the reports do not refer to high status objective/Blue Dot waterbodies. This should be addressed in the final Plan.”

LAWPRO noted that “in the Plan, SEA and NIS, the requirements of high-status objective waters or Blue Dots, are omitted”. They requested that “this is acknowledged in all documents to reflect the sensitivity of these waters, and the higher standards required in terms of wastewater discharges”. They commented that “a commitment to resolving all pressures on HSO waters, which will also in turn support protected habitats and species with a high-status requirement”, would be welcomed. They also welcomed reference to the “Sectoral action plans within the 46 Catchment Management Plans (sub plans of the RBMP, yet to be developed)” in the SEA.

SWAN recommends more emphasis should be placed in the WSSP on measures to address particularly sensitive sites, especially catchments of High-Status Water Bodies and Special Areas of Conservation (SACs) and that there is a far clearer commitment in the WSSP to conduct Uisce Éireann operations in a way that fully protects these sites. Very particularly we are calling for a commitment to protect the endangered Freshwater Pearl Mussel through extremely robust discharge prevention in rivers which have population of FWPM. We note that there are no specific actions in this regard in the Uisce Éireann Biodiversity Action Plan.

SEA Environmental Report has been updated to provide additional references to high status Waterbodies and blue dot catchments –so these are specifically recognized rather than generally included. We note that these are already being addressed through the NWRP commitment to sustainable abstractions.

There is a commitment to protection of High-Status Water Bodies and European Sites including Special Areas of Conservation (SACs) and this includes consideration of Freshwater Pearl Mussel. We are fully committed to the AA process at plan and project levels and these aspects will be considered as part of that process (See also response on AA section). We note that our BAP will be updated to reflect the 4th National BAP and requirements under the Nature Restoration Law.

Transboundary effects

DAERA in their submission “is content that the environmental report and the process of consultation follow the SEA Directive” and “that previous consultations, including the SEA scoping have been considered as part of the Environmental Report”. DAERA noted that “as detailed under Section 6.4 that “more detailed consideration of environmental effects is expected to be undertaken on the lower tier plans and programme through SEA and AA where applicable and also through EIA and AA are project level where required”. In light of this, DAERA requested that “should any changes which are likely to impact Northern Ireland be included, then DAERA should be re-consulted”. NIEA Natural Environment Division (NED) were also of the opinion that “should there be any changes to the current plan which results in the potential for transboundary impacts then the relevant authorities in NI should be consulted”.

NED “welcome the acknowledgement and consideration of transboundary environmental effects within the SEA”. NED would welcome the inclusion in Appendix C of details of future trends, aquatic habitats, invasive species and species status as had been carried out for the Republic of Ireland”. NED noted Section 6.4 regarding lower tier plans and programmes and advised that “this should include relevant authorities in NI should there be the potential for impacts in Northern Ireland”.

The Water Management Unit noted the inclusion of transboundary impacts in the environment and noted that their comments in response to the scoping exercise have been considered and where appropriate, incorporated into the SEA report”.

The submission pointed out a statement on page 86 of the SEA which stated, “Agricultural use of wastewater sludge is considered positive for SEA objectives for soils and resource use although mixed in terms of water, biodiversity and fisheries given potential for nutrient rich run-off which can contribute to water pollution.” The submission requested that Uisce Éireann note that “there are also potential air pollution impacts, via ammonia emissions from sludge application to soils, on plant health and biodiversity in nearby nutrient-poor habitats (such as peatlands)” and that “sewage sludge application can have transboundary effects via atmospheric transport of ammonia emissions to other jurisdictions”. They

continued to state that this “would also be an issue for consideration in the review and update of the Ireland’s second National Waste Sludge Management Plan”.

DAERA’s submission highlighted a number of items within the SEA that they welcomed and also included a number of items that they recommended to be considered in the SEA including the following:

- In Section 4.1.2 – climate change, they advised Uisce Éireann to consider The Climate Change Act (Northern Ireland) 2022.
- In Section 4.1.3 – Biodiversity, they advised considering the following legislation: The Wildlife (Northern Ireland) Order 1985, Conservation (Natural Habitats, etc.) Regulations (Northern Ireland) 1995 and Wildlife and Natural Environment Act (Northern Ireland) 2011 (legislation.gov.uk)
- In Section 4.1.5 – Land use and planning, they advised also considering the Strategic Planning Policy Statement 2015 and Northern Ireland Regional Seascape Character Assessment.
- In Table 5.1, they advised considering the introduction of invasive non-native species. They also noted that “hydrological changes could potentially lead to changes in coastal processes which could impact Annex I habitats such as submerged sandbanks and Reefs and their associated species”.
- In Section 5.5, they advised “using the DAERA Marine Map Viewer for transboundary information on marine biodiversity (MPAs, Habitats and Species), marine heritage and seascape. In addition, for coastal geomorphology data please refer to the Northern Ireland Coastal Viewer”.
- In Section 8.4, they advised considering the draft Marine Plan for Northern Ireland, The Climate Change Act (Northern Ireland) 2022, The Marine and Coastal Access Act 2009, The Marine Strategy Regulations 2010 and Integrated Coastal Zone Management Strategy for Northern Ireland 2006-2026.
- In Appendix C.13.1, they recommended listing DAERA M&FD as a key organisation.
- In Appendix C.13.2, the consideration of East Coast Marine pSPA and Carlingford Marine pSPA however, they advised they are both still pSPA not SPAs. In addition, they advised “there are 48 marine protected areas as opposed to 55 sites (<https://www.daera-ni.gov.uk/articles/marine-protected-areas>)”.

DAERA welcomed the inclusion marine policy documents, but also DAERA recommended Uisce Éireann “reference the draft Marine Plan for Northern Ireland in the list of proposed NI and UK plans in the cumulative assessment for the transboundary environment”.

They stated that the “SEA Report has largely been accomplished in a comprehensive manner as the baseline information and effects on the marine environment have been

considered and drawn out in a transparent manner within the assessment. The transboundary assessment is particularly welcomed”.

Reference to the highlighted legislation, organisations, sources and plans have been added where not already identified, to the relevant SEA transboundary sections in response to comments from DAERA as relevant in SEA Environmental Report section 4. Appendix B and C -In Appendix C.13.1, DAERA M&FD is listed as a key organisation.

In Appendix C.13.2, the consideration of East Coast Marine pSPA and Carlingford Marine pSPA has been clarified to confirm they are both still pSPA not SPAs (We note for the purposes of our assessment that proposed and candidate sites are considered as for confirmed sites). Amendment on the number of marine protected areas to 48 (<https://www.daera-ni.gov.uk/articles/marine-protected-areas>)”.

The draft Marine Plan for Northern Ireland has been added to the list of proposed NI and UK plans considered in the cumulative assessment for the transboundary environment.

The submission by the Historic Environment Division “reiterates the suggestion that the Cultural Heritage objective outlined in Table 6.1 is amended to better align with NI strategic policy and guidance¹ as follows: ‘Protect, conserve and enhance cultural heritage assets; their condition, settings and access - including for designated sites and, undesignated heritage and archaeological sites of interest related to provision of water and wastewater services.”

The HED also notes “the potential interrelationships between cultural heritage and health and well-being particularly in the context of this plan and suggests that Table 5.3 is updated to acknowledge these identified interrelationships.”

The Cultural Heritage objective outlined in Table 6.1 is amended to ‘Protect, conserve and enhance cultural heritage assets; their condition, settings and access including for designated sites and, undesignated heritage and archaeological sites of interest related to provision of water and wastewater services. There are no changes to the assessments undertaken against the objective.

The potential interrelationships between cultural heritage and health and well-being are included in the table 5.3 highlighting key interrelated topics.

Inland Fisheries WSSP Action comments

Inland Fisheries Ireland's "comments and observations on the topics within the Strategic Environmental Assessment relating to UÉ's Strategic Objectives, Aims and Actions are documented in the table below in terms of cross-references to IFI's responses to the Plan

Environmental Mitigation Action Plan	IFI Comments/Keywords [Relevant UÉ action in brackets]
EAP2 – Source Protection	Source Protection [1.3]; Water Conservation [1.7] WFD Objectives [3.4]
EAP3 – Contingency Planning	Maintain Ecological Baseflows [1.4]; Storage Reservoirs [1.5] Emerging Pollutants [3.1]; IUWMPs [3.2]; DW Abstraction [3.3]; Impoundments [3.6]; Barriers [3.6]; Biodiversity Net Gain [3.7]; Nature Based Solutions [3.8] Water Conservation [4.4];
EAP4 – Monitoring and review of plan implementation and environmental effects	EDMs [2.2] Emerging Pollutants [3.1]; IUWMPs [3.2]; DW Abstraction [3.3]; WFD Objectives [3.4]; Wastewater Compliance [3.5]; Impoundments [3.6]; Biodiversity Net Gain [3.7]; Nature Based Solutions [3.8]
EAP5 – Environmental and Social Impacts	Maintain Ecological Baseflows [1.4]; Water Conservation [1.7] EDMs [2.2] Emerging Pollutants [3.1]; IUWMPs [3.2]; DW Abstraction [3.3]; DWTP Licensing [3.3]; WFD Objectives [3.4]; Wastewater Compliance [3.5]; Impoundments [3.6]; Barriers [3.6]; Biosolids [4.3]; Water Conservation [4.4]
EAP6 – Unsustainable Water and Wastewater Provision	Water Conservation [1.7] Sustainable Development [2.6]
EAP7 – Catchment Management and Nature Based Solutions	Biodiversity Net Gain [3.7]; Nature Based Solutions [3.8]
EAP8 – Net Zero Roadmap	Net Zero Roadmap [4.1]
EAP9 – Development of Environmental Evaluation and Quantification Approaches	Biodiversity Net Gain [3.7]; Nature Based Solutions [3.8]

Question 1 with the Environmental Mitigation Action Plan in Table 9-1 of the SEA. "Inland Fisheries Ireland's comments on the Plan actions are considered in section 6 in this consultation report for all the Plan Actions commented on.

SEA Environment Action Plan Table 9.1 actions have been amended to reflect where plan amendments have been made responding to comments on the UÉ's Strategic Objectives, Aims and Actions where relevant to the SEA actions.

Collaboration and abstraction consultation

An Taisce noted that “with regard to securing SDG 12 Responsible consumption and production, in the SEA Environmental Report, we would encourage a commitment to greater collaboration with the EPA and other stakeholders in monitoring unregulated abstractions. In particular, the cumulative impacts of lower level, unregulated abstractions throughout the country, those which are not above the licencing/registration thresholds stipulated in the Water Environment (Abstractions and Associated Impoundments) Act4 are in urgent need of greater monitoring and oversight to assess the potential environmental impacts, particularly in cumulation with licenced abstractions.

An Taisce also noted “Uisce Éireann’s statutory obligations under Part 6 of the Abstractions Act with regard to carrying out abstractions, particularly: 62. (1) Irish Water shall, not less than 42 days before the date on which it proposes to commence carrying out a public abstraction, give notice of the proposal in accordance with this section.

They noted that this “ensures maximum transparency regarding abstraction needs and quantities and allows for effective monitoring on water levels in the targeted water body which is important for securing the objective of the Water Framework Directive for all water bodies to achieve good status by 2027”. Furthermore, they noted that it “would assist in achieving Action 3.3: Environmentally sustainable water supplies – Ensure sustainable abstractions and manage water treatment residuals”.

Uisce Éireann note that information on unregulated abstractions outside Uisce Éireann responsibility is held by EPA and not available directly to Uisce Éireann and is outside its direct responsibility. Collaboration with the EPA would be expected as part of any abstraction licensing process to consider potential for combined effects with unregulated abstractions

Recognition of Uisce Éireann’s statutory obligations under Part 6 of the Abstractions Act with regard to carrying out abstractions, particularly: 62 and notification and information provision requirements in relation to proposals to commence carrying out a public abstraction is included in Plan Action 3.8 and is part of our compliance commitments.

Riparian health

Another stakeholder commented that “the mitigations and impacts are understated and not explored in any detail for any of the items such riparian health etc.” They also noted that “it does not seem sensible that the standard response is that we will deal with it in another plan”.

The WSSP 2050 is a high level of plan which provides direction to implementing plans which identify specific project and programme options to take forward in specific locations. The approach taken to identify actions for these plans is considered appropriate and is also accepted by the environmental authorities. Aspects such as riparian health would be covered by the commitments to meeting SEA objectives on water environment and biodiversity.

Protection of shellfish waters

Bord Iascaigh Mhara (BIM) noted that “in response to consultation comment no.33 (Appendix C), BIM feel the response should be extended to potential impacts of water quality deterioration on Shellfish waters”. In response to consultation comment no.34, BIM noted that food security is addressed from an agricultural perspective but advised that “it also needs to be explicitly referenced to the impacts on aquaculture production”. In response to consultation comment no.36, within the Strategic Environmental Assessment (SEA) Environmental Report, BIM welcomed the “inclusion and reference to National Strategic Plan for Sustainable Aquaculture Development 2030 (DAFM 2023)”. They also welcomed “under SEA topics of “Fisheries” that shellfish waters have been included within the strategic environmental objectives and that WWDA Shellfish Water requirements compliance been indicated as a SEA Target”. BIM noted that “Appendix D did not include a list of Shellfish waters as requested and that this be rectified”.

BIM welcomed that “under the types of impacts that could give rise to significant effects on the environment within discharge of treated wastewater and stormwater and untreated discharges, reference to “fisheries impacts including on Shellfish Waters Protected Areas and associated users and livelihoods” has been included”. However, BIM noted “in the response (Appendix C, p. 83 responses) to fisheries and aquaculture that Uisce Éireann commit to meeting wastewater treatment standards”. And also note that the integration of the Shellfish Waters Directive into the WFD remains at the centre of protection of water quality within Shellfish production areas.

As part of the SEA assessment of the Draft WSSP 2050 under Strategic Objective 3 (Protect and Restore our Environment) Action 3.5 commentary states “Uisce Éireann will also collaborate with stakeholders to develop and implement a monitoring programme to understand the water quality risks to bathing waters and shellfish habitats.” BIM suggested that “this can be strengthened by going beyond understanding to explicitly state that water quality risks to bathing waters and shellfish habitats are actively mitigated as part of RBMPs and Pollution Prevention Reduction Plans (PPRPs)”. They also recommended that “the protection of shellfish waters should be specifically included within the Strategic Objective 3 actions under Aim 7 –Protecting our water environment”. Finally, BIM welcomed “the

inclusion of monitoring of shellfish related environmental impacts from wastewater discharges as part of the SEA monitoring”.

In response to the above, Appendix C has been amended to reflect Bord Iascaigh Mhara consultation comment no.33 on the potential impacts of water quality deterioration on Shellfish” We also note that addressing water quality impacts on Shellfish Waters are part of our commitment to meeting water quality objectives as set out in the WSSP 2050 under Objective 3.

BIM’s comment on SEA Environmental Appendix C, on food security is addressed has been amended to also explicitly reference the impacts on aquaculture production.

A list of the Shellfish Waters has been added as Appendix E and reference in the Appendix C comment has been amended from Appendix D to Appendix E.

Response to Appendix C, p 83 section on Shellfish Waters recognises the integration of Shellfish Waters Directive into the WFD and that this remains at the centre of protection of water quality within Shellfish production areas. The requirements for the assessment of the impacts of wastewater discharges on specific designated Shellfish Waters are also noted.

SEA assessment for Strategic Objective 3 (Protect and Restore our Environment) Action 3.5 commentary states “Uisce Éireann will also collaborate with stakeholders to develop and implement a monitoring programme to understand the water quality risks to bathing waters and shellfish waters.” The SEA assessment has been amended to add that water quality risks to bathing waters and shellfish habitats are actively mitigated as part of RBMPs and Pollution Prevention Reduction Plans (PPRP). The protection of shellfish waters is included within the Strategic Objective 3 actions under Aim 7 –Protecting our water environment”

We also note that the 3rd RBMP has been published as the Water Action Plan 2024 and references to this and other recently published plans are included in the updates to the SEA Environmental Report.

Clarification and strengthening the Plan / environmental assessment links

In regard to the integration of environmental considerations into the Plan, EPA acknowledged that “environmental considerations are reflected in the policy objectives for the Plan” and welcomed “the commitments associated with mitigation of potential adverse effects, ongoing environmental monitoring, and stakeholder engagement”. They stated that “integrating environmental considerations is essential to ensure the Plan successfully advances the provision of the necessary water services over the plan period, while also protecting and improving water quality, biodiversity, and considers wider environmental

aspects, such as landscape sensitivity". They recommended that "the Plan should reflect and incorporate the recommendations and mitigation measures identified in the SEA Environmental Report and the Appropriate Assessment (AA) Natura Impact Statement". They also advised that "it should also include a clear commitment to implement these recommendations and mitigation measures. Including this as a table within the plan would assist with better integration between the plan making and SEA processes and will help provide for better overall positive environmental outcomes". The EPA noted that the Plan acknowledges and refers to the proposed SEA and AA recommendations, but recommended "including a table in the Plan, showing how these recommendations are reflected in the Plan".

The EPA acknowledged "the comprehensive approach taken to considering alternatives in the SEA set out in Chapter 7 of the SEA Environmental Report" and welcomed "that the EPA guidance on developing and accessing alternatives was considered". They suggested that "Table 7.19 SEA assessment of the Draft WSSP 2050 Strategic Objective 3 Actions mitigations should be included in the Plan". They also refer to Table 8.1 these and Objective 1 and recommend that "where the SEA identifies potential for negative or uncertain effects, including cumulative effects, the Plan should ensure that appropriate measures are provided to monitor for these, and provide the relevant mitigation measures where and when necessary".

EPA's comments on the SEA noted with regards to Chapter 9 of the SEA, the EPA recommended that "Uisce Éireann tabulate the various commitments of the Plan (4 Strategic objectives, 14 aims and 35 actions) and compares these against the Strategic Environmental Objectives set out in Chapter 6 of the SEA: Environmental Report". They commented that "this would help set the context for the assessments in Chapters 7 and 8". In reference to Table 9.1 Environmental Mitigation Action Plan, the EPA suggested that "further information could be provided on which measures or actions of the Plan require specific mitigation measures to be introduced. This information would be useful to inform environmental assessments of projects arising out of the Plan and in monitoring how effective the Plan is at, implementing the necessary mitigation measures".

In regards Mitigation and monitoring consideration the EPA also recommended that "the Monitoring Framework set out in Table 9.2 Draft Monitoring Plan: indicators and targets should be further developed in consultation with the relevant statutory environmental authorities". They noted that the "monitoring programme should be flexible to consider other ongoing national level monitoring programmes, such as those associated with the Draft Third River Basin Management Plan and the EPA's State of the Environment for example" and that "the environmental monitoring should be linked with Plan Implementation monitoring and reporting". The EPA also commented that "it would be

useful to include information on any relevant thresholds for when unforeseen adverse environmental effects would trigger appropriate remedial action where required". They recommended that "the outcome of monitoring should be reviewed at the 5 yearly review period. This can help inform future reviews of the Plan and any additional mitigation or monitoring requirements that may be necessary".

The further stated that "the monitoring programme should set out the various data sources, monitoring frequencies and responsibilities. If the monitoring identifies adverse impacts during the implementation of the Plan, it should be ensured that suitable, effective and timely remedial action is taken. Monitoring of both positive and negative effects should be considered". They also commented that "the scope of any transboundary related monitoring and datasets should be developed in consultation with the relevant Northern Ireland authorities, where appropriate and relevant".

In regards future modifications to the Plan, the EPA requested that "any future amendments to the Plan should be screened for likely significant effects, using the same method of assessment applied in the "environmental assessment" of the Plan".

The EPA also made standard recommendations on the requirements for the SEA process.

We note that SEA Environmental Report Tables 7.17 to 7.20 are four tables providing a summary of the SEA assessment of the Draft WSSP 2050 covering each WSSP aim and action under the four WSSP Strategic Objectives. These include identifying potential positive and mixed negative and positive effects. We have provided a summary of the tables in the SEA NTS. The Plan has been updated to refer to the SEA assessment in section 9.3.

SEA ER Table 8.1 identifies potential for negative or uncertain effects, including cumulative effects. The SEA ER identifies the mitigation measures to address and monitor these in section 9 and tables 9.1 and 9.2 and these are committed to in the Plan in section 9.3.

In relation to the EPA's comments on the SEA with regards to Chapter 9 of the SEA, recommending that Uisce Éireann tabulate the various commitments of the Plan (4 Strategic objectives, 14 aims and 35 actions) and compares these against the Strategic Environmental Objectives set out in Chapter 6 of the SEA: Environmental Report, we note that this has already been provided in Tables 7.17 to 7.20 which set out the assessment against each of the 35 actions, grouped by the 14 aims and 4 strategic objectives. The tables also identify the mitigation measures and actions that are then covered further in section 7 on the plan assessment and section 8 on the cumulative assessment and then the action specific mitigation measures that are summarized in section 9 table 9.1 EAP. To support the cross referencing and to address the EPA's recommendation Table 9.1 EAP references have also been added to Table 7.17 -7.20 and

clarification of the link to the action-by-action assessment in section 7 and 8 in the SEA is also added to the text in section 9 of the WSSP 2050.

In reference to EPA comments on Table 9.1 Environmental Mitigation Action Plan that further information could be provided on which measures or actions of the Plan require specific mitigation measures to be introduced we note that the table 9.1 already identifies the relevant plan actions for each mitigation measure. We have added further clarification for the cross referencing with the plan actions and for monitoring implementation to further inform environmental assessments of projects arising out of the Plan and in monitoring how effective the Plan is at, implementing the necessary mitigation measures.

In relation to the EPA comment that the Draft Monitoring Plan: indicators and targets should be further developed in consultation with the relevant statutory environmental authorities, we are committed to taking on board comments through the current consultation process in the final Monitoring Plan to be included in the SEA Statement which will be committed to and published alongside the adopted Plan. We will undertake consultation on delivering the monitoring identified through the Tier 2 plans with the key relevant stakeholders, including the EPA. These Tier 2 plans include further development to the Monitoring Plans' indicators and targets and the consultation with stakeholders will be part of any SEA process applied and will inform monitoring of the WSSP and 5 year review.

We have added recognition for the need for the monitoring programme to be flexible with the need to take on other ongoing national level monitoring programmes, such as those associated with the Third River Basin Management Plan and the EPA's State of the Environment for example.

We have explicitly linked environmental monitoring with Plan Implementation monitoring and reporting – see section 9 of the SEA and the Plan with reporting commitments identified to support the Plan on a 5 yearly basis.

Thresholds are identified for triggering appropriate remedial action where required and this process are explained in SEA Environmental Report section 9 and has been further clarified in relation to development of the Tier 2 plans and monitoring in the SEA Statement.

The commitment provided in section 9 of both the SEA and the Plan is for the outcome of monitoring should be reviewed at the 5 yearly review period to help inform future reviews of the Plan and any additional mitigation or monitoring requirements that may be necessary. This is already part of the Plan.

The monitoring plan sets out the various data sources, monitoring frequencies and responsibilities and how they are to be implemented through tier 2 plans. -

The process for monitoring to identify adverse impacts during the implementation of the Plan, to ensure that suitable, effective and timely remedial action is taken is stated in section 9.4 of the SEA Environmental Report.

Monitoring considers both positive and negative effects in relation to meeting SEA objectives.

The need for developing monitoring and datasets on transboundary effects in consultation with the relevant Northern Ireland authorities is further clarified in SEA Environmental Report Table 9.1. Section 9 of the plan and the SEA ER identified that future modifications to the Plan will be screened for likely significant effects. No change required but reference to using 'the same method of assessment as applied to the Plan' has been added for clarification.

An Environmental Statement will be issued once the final plan has been adopted covering the required elements as documented in the EPA comments and provided to the environmental authorities listed as well as being published.

The plan cross refers to the recommendations and mitigation measures identified in the SEA Environmental Report and the Appropriate Assessment (AA) Natura Impact Statement (Section 9 of the plan). This has been achieved in the Plan in Section 9.3 by fully recognising the commitment to implementing the SEA and AA NIS recommendations and mitigation measures. The Plan cross refers to the mitigation and monitoring tables 9.1 and 9.2 in the SEA Environmental Report.

Peatland archaeological investigations

Irish Peatland Conservation Council (IPCC) noted that there needs to be “scientific supervision from an independent body that will evaluate any infrastructural development, habitat restoration/creation project for its archaeological importance.” The IPCC also highlighted that they could not support the development before a “full archaeological survey is undertaken, and the necessary precautions and mitigations are in place to ensure that no loss of cultural archaeological information occurs as an outcome of development.”

In response to the Irish Peatland Conservation Council, we will comply with all legislative requirements with regard to the NIS as well as the SEA. the WSSP itself, and any further environmental assessments including archaeological investigations that are outcomes of the WSSP.

6.8.2 Conclusions on SEA

Having carefully reviewed the submissions received on SEA Uisce Éireann have considered the following recommendations and clarifications that should be provided in the WSSP 2050 and the Strategic Environmental Assessment Environmental Report.

Clarifications on SEA Feedback

The majority of responses to consultation comments related to the SEA Environmental Report for the draft WSSP2050 are clarifications or updates including:

- Adding new or updated policy, plans and legislation informing the context of the plan and the environmental assessment. We note also that the process of review will continue as part of the plan implementation as addressed in section 9 and 10 of WSSP 2050 and as set out in section 6.11 of this consultation report.
- Clarification on High Status water bodies, Blue Dot catchments, freshwater pearl mussel, bathing waters and shellfish waters in the SEA assessment and plan commitments.
- Collaboration and engagement for the implementation of the plan, abstraction licencing requirements and environmental assessments.
- Providing for growth and taking account of environmental capacity.
- Transboundary effects to align with Northern Ireland policy and data more clearly in specific cases and to consider future baseline trends and also potential for water and air pollution effects from sludge spreading.
- Clarifications on how assessment including cumulative assessment have been incorporated into the mitigation recommendations.

Recommendations on SEA Feedback

The main recommendations related to the SEA are:

- Inclusion of a number of policies, acts and strategies relating to marine matters in Northern Ireland, in the cumulative assessment.
- Biodiversity actions and mitigation for existing operations recommendations included making amendments to the WSSP Action 3.3 to include the preparation of risk assessments and enhancement of contingency plans and incident response procedures and the updates to the SEA for this action include recommendations to prioritise risk assessments for sensitive sites for example high status water bodies, European Sites and drinking water abstractions.

- Update of the WSSP 2050 to strengthen links to more clearly commit to the environmental assessment mitigation recommendations and the implementation of the monitoring plan.

6.9 NIS

6.9.1 Summary of NIS Feedback

Consultation with Minister

The Department of Housing, Local Government and Heritage recommended updating Section 1.4 of the NIS to outline the legislative obligations of public authorities to consult with the Minister in accordance with Regulation 42(9) and Regulation 42(10) of the European Communities (Birds and Natural Habitats) Regulations, 2011 (as amended).

In response to the Department of Housing, Local Government and Heritage, section 1.4 will be updated to reflect the legislative obligations with the following text.

Additionally, under Regulation 42(9c) of the Habitats Regulations Uisce Éireann must: "Submit a Natura Impact Statement together with evidence compiled under subparagraph (b) to the Minister not later than six weeks before it proposes to adopt or undertake the plan or project to which the Natura Impact Statement and evidence relates." Furthermore, under Regulation 49(10) Uisce Éireann must determine whether the WSSP 2050 would adversely affect the integrity of a European site before a decision is taken to approve and adopt the plan.

Mitigation for existing operations

The DHLGH stated that tables 6-4 to 6-7 of the NIS outlines the AA conclusions with recommended mitigation measures for each action that were considered further in the NIS. It is important to state this legislative requirement, however there may be additional mitigation measures required to ensure the protection of European sites due to existing operations. For example, "mitigation measures whereby there is a commitment to prepare comprehensive risk assessments, contingency plans and incident response procedures to ensure pollution threats can be eliminated at both existing and any planned new sites operated by Uisce Éireann. This will include sites that are within, adjacent to, ecologically or hydrologically linked to European sites."

NPWS also recommend an additional mitigation measure is included in the AA, whereby comprehensive risk assessments, contingency plans and incident response processes are prepared to ensure pollution threats can be eliminated at both existing and any planned new sites operated by Uisce Éireann.

Action 3.3 of the WSSP has been amended to manage our water service assets and operations to reduce the risk of impacts to water bodies. Uisce Éireann will manage water service assets and

operations to mitigate the potential pollution threats to water bodies. This involves conducting risk assessments, implementing preventative measures, and enhancing contingency plans and incident response processes. Uisce Éireann approach aims to improve the resilience of our operations and protect the environment.

Biodiversity Net Gain

It is noted in Table 6-6 for Action 3.7 “Manage our assets to have biodiversity ‘net gain’” no mitigation measure has been recommended within the AA conclusion. However, as previously stated in section 2 of this document, it is imperative that any positive biodiversity actions are appropriate to the location; all biodiversity projects will require screening for AA, in accordance with the Habitats Directive. NPWS recommend that Table 6-6 Action 3.7 is updated to include the mitigation measure whereby it is clearly stated that biodiversity projects will need to be screened for AA, in accordance with the Habitats Directive

For Action 3.7 Manage our assets to have biodiversity ‘net gain’ the mitigation has been amended to make clear that biodiversity projects will require assessment under the Habitats Regulations.

Northern Ireland and consultation with relevant authorities

DAERA requested the inclusion of details of future trends, aquatic habitats, invasive species and species status for Northern Ireland as had been carried out for the Republic of Ireland. The Natural Environment Division requested that should there be any changes to the current plan which results in the potential for transboundary impacts, “then the relevant authorities in NI should be consulted.” The NED also noted that within Section 6.4, lower tier plans and programmes are expected to “require more detailed consideration of environmental effects through SEA and AA where applicable and also EIA and AA NED advise that this should include relevant authorities in NI should there be the potential for impacts in Northern Ireland.” NED welcomed the inclusion of Ramsar sites and advised that, should the NIS change in respect to impacts upon Northern Irish European Designated sites, NED be re-consulted.

In response to DAERA, additional information on details of future trends, aquatic habitats, invasive species and species status has been added to the NIS. A reference for the need to consult with the relevant bodies in NI, including NED, has been added to the NIS.

Ramsar sites, invasive species & hydrological changes

In particular, NED advised that the following sections be adjusted:

- “In Section 1.7.2, we advise that Marine Conservation Branch is part of DAERA M&FD rather than NIEA.
- In Section 4, we welcome the following statement, ‘In addition to these, the Northern Ireland National SAC Network comprises 58 SACs and 18 SPAs (including two proposed SPAs (pSPAs)).’ Furthermore, we advise listing Ramsar sites.
- In Section 6.3 – Impact sources and effects pathways - we advise considering the introduction of invasive non-native species. In addition, we advise that hydrological changes could potentially lead to changes in coastal processes which could impact Annex I habitats such as submerged sandbanks and Reefs and their associated species.
- In Table 7-1, we welcome the consideration of the UK Marine Policy Statement 2011. In addition, we advise also considering the following policies, plans and legislation; The Marine and Coastal Access Act 2009, The Marine Strategy Regulations 2010, The draft Marine Plan for Northern Ireland (consultation 2018), Marine Act (Northern Ireland) 2013 and An Integrated Coastal Zone Management Strategy for Northern Ireland 2006-2026.”

Section 1.7.2 will be amended. Ramsar sites will be discussed in Section 4 and a full list will be provided in an appendix. We note the point that hydrological changes could lead to changes in coastal processes and will amend the text appropriately. We will add the plans that are listed to the assessment table. Invasive non-native species are already included in the NIS, in Section 6.3 (Impact Sources and Effects Pathways) where a sub-section discusses them including Table 6-2. They are also mentioned in the Executive Summary. The suggested policies, plans and legislation have now been included within the NIS.

Drinking water treatment plants

Inland Fisheries Ireland noted that DWTPs require consideration, including licensing of discharges.

In response to Inland Fisheries Ireland, discharges from Drinking Water Treatment Plants (DWTPs) will be added to Table 6-2.

Draft WSSP

In addition, Inland Fisheries Ireland highlighted that the draft WSSP must take full account of the climate and biodiversity crisis when identifying and evaluating the mitigation measures necessary.

In response to Inland Fisheries Ireland, the biodiversity and climate crises were highlighted in the Issues report and were included in the WSSP 2050 as one of the challenges. Section 8 of the Plan discusses the approach that Uisce Éireann will need to take to deliver on their strategic objectives. Thus, the biodiversity and climate crises, and other challenges, inform the aims and actions of the WSSP 2050 as well as the means to achieve them. The NIS, in undertaking the

assessment under the Habitats Regulations, is therefore taking full account of the climate and biodiversity crises including necessary mitigation measures.

LAWPRO requested that the requirements of “high-status objective waters or Blue Dots” are acknowledged in all documents to reflect the “*sensitivity of these waters and the higher standards required in terms of wastewater discharges.*” LAWPRO also recommended a commitment to resolving all pressures on HSO waters, which will also in turn support protect habitats and species with a high-status requirement.

In response to LAWPRO, a reference to Blue Dot waters will be made in the NIS in discussion of SACs (and SPAs if applicable). However, it should be noted that Blue Dot waters that are not Natura 2000 sites would not fall under the remit of an NIS/AA. (See also SEA section 5.12 response on this point).

Sources of information

LAWPRO also highlighted that within the NIS, the “*reference to Mayes E (2008). Water Framework Directive, Programme of Measures, High Status Sites; Annex IV Protected Areas: Water Dependent Habitats and Species. The reference to ‘December 2008’, is out of date in terms of the network of HSO water bodies. An updated list of sites is available on the EPAs Geoportal.*” LAWPRO welcomed reference to “*Sectoral action plans within the 46 Catchment Management Plans (sub plans of the RBMP, yet to be developed)*” in the SEA and requested that a similar reference or commitment is included in the Plan itself or the NIS.

The information in Mayes has only been used in the NIS to determine the water dependency of habitats and species features (i.e., whether groundwater, surface water etc.). The Mayes report was not used to determine condition status; this information was taken from Conservation Status in Ireland of Habitats and Species listed on the European Council Directive on the Conservation of Habitats, Flora and Fauna 92/43/EEC Volumes 1-3 (NPWS 2019). We will check the NIS to make sure that there will be no confusion regarding this.

The RBMP has now been adopted and the text will be updated to reflect this. A reference to the sectoral action plans will be made at the same time.

6.9.2 Conclusions on NIS

Having carefully reviewed the submissions received on NIS Uisce Éireann have considered the following recommendations and clarifications that should be provided in the WSSP 2050 and the NIS.

Clarifications on NIS Feedback

Responses to consultation comments related to the NIS included clarifications for the following:

- Obligations of public authorities to consult with the Minister regarding the NIS.
- A requirement that projects aiming to provide biodiversity net gain would still need to be screened for AA, in accordance with the Habitats Directive.
- The WSSP takes into account the biodiversity and climate crises, and other challenges, as they inform the aims and actions of the plan, Through assessment of the actions the NIS/AA therefore also takes into account the crises.
- Text that hydrological changes could potentially lead to changes in coastal processes was added.
- The introduction of invasive species as a risk to European Sites had already been included in the NIS and no additional text was added,
- Blue dot waters were discussed in their relation to SACs and SPAs but were not assessed within the NIS/AA as they do not fall under the remit of the Habitats Directive within their own right.
- The Mayes (2008) document was only used for determining the water dependency of qualifying features (habitats and species) and was not used for feature condition. Condition information was taken from NPWS documents.

Recommendations on NIS Feedback

The main recommendations relating to the NIS are:

- Mitigation for existing operations regarding pollution threats included making amendments to the WSSP Action 3.3 which includes preparation of risk assessments and enhancement of contingency plans and incident response procedures, and updates to the NIS/AA to reflect this change to the action.
- The inclusion of Ramsar sites in Northern Ireland in the AA.
- The inclusion of a number of policies, acts and strategies relating to marine matters in Northern Ireland, in the in-combination assessment.

6.10 Out of Scope

In this chapter, we summarise the key references in submissions to issues under the broad theme of “outside of the scope of this Plan”. We first set out a summary of the relevant references within the submissions, followed by our response. Although not directly related to this consultation, we have captured and summarised feedback and have forwarded any queries to the relevant teams in Uisce Éireann to respond.

New developments

Inland Fisheries Ireland commented that that the supporting infrastructure must be in place before new development can occur. “Before permission for new development can take place the necessary headroom for the additional hydraulic and organic loading should be available before the development proceeds”. IFI commented that there should be a presumption against new development where the resource capacity and treatment capacity do not exist or is not available. This, they noted, should be an integral part of local, regional and national planning policy and avoids unsuitable water and wastewater provision.

Uisce Éireann notes IFI comment, planning decisions are outside UE's remit, we provide capacity registers annually to planning authorities.

“Contractors must demonstrate competence in adhering to construction management plans that aim to prevent incidents of environmental pollution at and from Uisce Éireann assets.” LAWPRO also requested that every development which has planning consent is undertaken and overseen properly. contractors need to know why conditions around prevention/mitigation of potential impact are important when they are onsite. “Current and proposed upgrades in the planning consent phase should include scoping to ensure adequate facilities and budget are provided, thereby pre-empting future requirements. A dedicated resource to act on significant pressure referrals from LAWPRO together with responses to reports of environmental pollution incidents from Uisce Éireann assets is requested. ”

A stakeholder requested more funding for “anybody to learn about how to make/maintain healthy soil and water sources, and growing food sustainably with efficient irrigation systems and water-based natural fertilizers (liquid feeds)”.

This is outside the remit of Uisce Éireann.

A stakeholder requested suggested Uisce Éireann push for greater enforcement of river buffer zones for slurry spreading. This is not complied with in a lot of areas.

Enforcement of buffer zones is outside UE's remit.

Irish Academy of Engineering commented that “a fit for purpose planning system with clear timelines for approvals is critical to timely implementation and upgrading of water services”. They noted that while a new Planning and Development Bill has been published, it has not progressed with the urgency needed to address the delays inherent in the current planning process. The Academy highlighted that “the EPA’s requirement for detailed delivery dates for completion of entire projects without allowing uncertainties in the planning process, land acquisition and other issues not under the direct control of the utility needs to be highlighted by Uisce Éireann to the EPA.”

Uisce Éireann note Irish Academy of Engineers submission however EPA regulatory requirements and changes to the planning system are outside of Uisce Éireann's remit. In our WSSP 2050 we identify collaboration as an important delivery approach to ensure the sustainable delivery of water services for Ireland.

One stakeholder commented that “better water supply for businesses will bring in even more jobs”. Other submissions commented that long-term decisions are good but too slow and that issues need to be dealt with quicker

We welcome the stakeholders' comments, we are committed to, key objectives of our water services strategic plan are to deliver safe and reliable drinking water. As per Action 4.5 we are also dedicated to continuous improvement of our processes, systems and information by striving to achieve ISO 55000 certification, which will support decision making to support sustainable services fit for the future.

In a joint submission by the Irish Home Builders' Association and Construction Industry Federation noted that the accessibility of serviced land availability data will be a future challenge for Uisce Éireann. They continued to comment that “compiling accurate and robust data on this will enable targeted infrastructure provision, as well as providing a useful reference tool which the whole industry (planners, local authorities, homebuilders etc.) can utilise”.

We welcome this comment in the joint submission by the Irish Home Builders' Association and Construction Industry Federation. The decision as to what data is required/needed lies more within the remit of planning authorities, we would feed info to planning authorities as required.

Councillor Munelly requested that “the water charging regime for farmers needs to be revised, reflecting the reality of many farmers having multiple meters on their land”. They suggested a single per customer charge as opposed to a per meter charge. They commented that “water usage being charged per cubic meter is acceptable, but there is an unfairness in having a charge for every meter. A single customer charge should replace this”.

Councillor Munelly suggested the new WSSP should take account of the minimum number of households required for a new Group Water Scheme connection. Cllr Munelly proposed that “there is a new category introduced to allow for new group water schemes that will serve less than 25 houses – perhaps a different rate of grant aid could be provided – but

this rule that is currently preventing households joining the public supply needs to be changed, and perhaps this policy document could reflect this”.

From October 2021 Non-domestic (water and wastewater) charges are billed on the harmonised non-domestic rates as approved by the CRU in July 2019. The rates have not changed since – some customers were moved to these rates immediately, while others transitioned over the period until September 2024.

- *Trade Effluent charges remain unchanged since 2014 i.e., billed per the LA rates.*
- *The current tariff levels no longer reflect UEs cost base, while the demand on and investment needed in water and wastewater treatment continues to increase.*
- *Circa 188k connections are on the non-domestic tariff framework e.g., offices, hotels, supermarkets, nursing homes, manufacturing.*
- *Circa 6,900 customers are discharging trade effluent into the network – this can range from a pharmaceutical production site down to a car wash for example.*
- *The CRU undertook a consultation on proposed updates to the non-domestic tariff framework including alignment and harmonisation of trade effluent and published its decision for the non-domestic tariff period commencing 1 October 2024, with initial trade effluent charging to be further consulted on and included for the charging the period from 1 October 2025.*
- *We are obliged then to apply the charges as set out and from the date set down.*
- *86% of customers (162,905 connections) may see annual bill increases of less than €250; 5.4% may see increases of between €250 and €500; 7.4% may see increases of between €500 and €5,000; and less than 1% may see increases of €5,000 or more.*
- *Customers facing larger increases could also benefit from a bill-capping arrangement, if the cost of the increased tariff is more than €750.*
- *The IFA made a submission to the CRU through the consultation with many of these arguments.*
- *Ultimately, it's the CRU who make the final decision, we must implement their decision.*

One stakeholder commented “I feel a lot of water is wasted by dairy farmers in their milking parlors. I believe that farmers and in particular dairy farmers should be encouraged to bore wells on their farms, for use in dairy cleaning and drinking water for animals. This would ease the pressure on public water and group water schemes which is intended for human consumption. A grant for such work would be encouraging. Farmers should also be encouraged to reduce livestock and in acres cooperation areas closing up of slated houses would help considerably”.

Uisce Éireann supplies water to customers on the public network. Farmers across Ireland may be supplied their water in different ways. They may be on the public network, be part of a group

water scheme and some may have their own well. The configuration and availability of water in each area will depend how a farm supplies their water. Not all farms may be able to have accessible water if they bore a well themselves. To support farmers Uisce Éireann has advised on how to conserve water, how to carry out a water audit and how to follow best practices, the farming community can play a part in protecting our water sources and the water environment. Our farm conservation tips include information on rain water harvesting and clean plate cooler water which dairy farmers can divert clean plate cooler water to a tank and use it for parlor washing.

Another stakeholder made an observation that “Agri/ Horti use a lot of potable water maybe local storage facilities would enable these farms to use their own untreated water and leave potable water for human consumption”.

Uisce Éireann has a dedicated website for farmers on how they can conserve water and protect the water supplies in their catchment areas. The website provides advice on how to conserve water, how to carry out a water audit and how to follow best practices; the farming community can play a part in protecting our water sources and the water environment. Our farm conservation tips include information on rain water harvesting and clean plate cooler water which dairy farmers can divert clean plate cooler water to a tank and use it for parlor washing.

The Irish Academy of Engineering mentioned the Greater Dublin Drainage (GDD) project and the Eastern and Midlands Water Supply Project in their submission, noting that “completion of both projects is critical to the economy and meeting water and wastewater needs and funding for the project should be prioritised by Government”. Meath County Council also welcomed the reference to the Water Supply Project Eastern and Midlands Region and the Greater Dublin Drainage Project in the Draft WSSP 2050 and “looks forward to the commencement of the projects”. Enterprise Ireland and IDA Ireland both stated that they “support expediting the delivery of this important project”, noting that “reliance on the river Liffey as a water source presents a serious vulnerability for businesses (and homes) in the greater Dublin region.

Uisce Éireann thanks the Irish Academy of Engineering, Meath County Council, Enterprise Ireland and the IDA for their comments on the Water Supply Project and the Greater Dublin Drainage project. The utility is continuing to progress these projects through the planning processes. For the Water Supply project following Government approval Uisce Éireann is preparing a Strategic Infrastructure Development application to An Bord Pleanála next year with construction estimated to take 4-5 years. For the Greater Dublin Drainage project An Bord Pleanála carried out a consultation on the Further Information on the planning application and held a statutory consultation from Tuesday May 7, 2024, to Friday June 7, 2024, inclusive. Following closure of the consultation period, An Bord Pleanála is considering the Further Information submitted, as

well as any observations or submissions received, to make a decision on the Remittal Application. When planning permission for the GDD Project is secured, Uisce Éireann will progress with the contractor procurement process for the construction of the project. It is currently expected that the construction stage will take approximately three years.

Galway City Council discussed the Ardaun Wastewater Network Extension (design stage) planning application which is due to be lodged by Uisce Éireann imminently and noted a progressing project to provide the ultimate water capacity to the Ardaun site. The Council commented that “these projects require continued priority to support land activation at Ardaun to meet the housing targets for the city”. In recognition of these projects, the Council requested “that the Uisce Éireann Water Services Strategic Plan 2050 includes for the delivery of the above mentioned key future growth enablers for Galway”.

The Council also referenced the following city-wide projects and requested that “these are also accounted for as part of the Uisce Éireann Water Services Strategic Plan 2050 as actions which meet the objectives of the aims and objective of the plan”:

- Completion of current project to duplicate and increase capacity of rising main from Terryland WTP to New Clifton Hill Reservoir including designed pressure vessel at Terryland and mains under River Corrib.
- The upgrade of the Clifton Hill to Tonabruckly rising main to cater for strategic future demands and provide supply security to the west of Galway City including any necessary upgrade and provision of contingency of the associated River Corrib Crossing pipework.
- Upgrade aging, particularly AC and CI pipework and replacement of public side lead connections, on foot of "Housing for All" policy, Galway City Development Plan 2023 - 2029, Public Realm Strategy, Galway City Council Transportation projects and existing service delivery. Some very good work underway by Regional Network Contractor can be used as a design basis.
- The continuation of the leakage reduction program.
- Any required upgrades arising from the development of the National Water Resources Plan.
- Progress implementation the outcomes of the Greater Galway Strategic Drainage Study to relieve pressure on Mutton Island WTP and provide growth potential in the Greater Galway area with the implementation of the Galway Strategic Drainage Study.
- Progress projects identified in Galway Area Drainage (DAP) Plan and Greater Galway Strategic Drainage Study.
- Foul and surface water cross connections causing pollution of receiving waters and threats to Beach water quality.

- Works on CSOs to reduce surface water pollution.
- Tidal water infiltration causes volume and treatment issues at Mutton Island WWTP.

Uisce Éireann thanks Galway County Council for their submission. As Uisce Éireann is a publicly owned, regulated, commercial State body we must operate within its Exchequer funding parameters and ensure best practice in terms of accountability, governance and delivering value for money for taxpayers for all projects. The building, repair and upgrading of Uisce Éireann's water treatment plants, wastewater treatment plants, water and sewer network requires a multi-billion-euro investment programme over many years. Our plan prioritizes key outcomes such as reducing leakage, ensuring at-risk water supplies are removed from the EPA's Remedial Action List, dealing with areas where raw sewage is discharged to rivers, lakes and the sea (untreated agglomerations), and addressing areas identified by the European Court of Justice that do not comply with the Urban Waste Water Treatment Directive. In preparing our Investment Plan, Uisce Éireann has optimised investment decisions by prioritising the best possible service improvements, while maximizing value-for-money.

Uisce Éireann is a regulated utility and as such has funding constraints so it must prioritise investment where it is needed most. The Capital Investment Plan was prepared within the regulatory framework which is set out in legislation. Under this framework, Uisce Éireann submits its plans in advance to our financial regulator, the Commission for Regulation of Utilities (CRU), for our proposed operational and investment spending in revenue funding "cycles". The current investment plan relates to the funding cycle referred to as "Revenue Control 3" (RC3) and covers the period from 2020-2024. It follows an extensive CRU led stakeholder consultation process during 2018-2019. Uisce Éireann has undertaken two rounds of consultation on the capital investment plan 2025-2029. Once the Strategic Funding Plan is approved by the Minister it will be submitted to the CRU who will carry out a public consultation on the plan.

Enterprise Ireland suggested “more consideration is required at a national level on whether cost recovery should be the goal in tariff setting for essential services, cognisant of other taxes, charges, and contributions made by system users”. They noted concerns regarding “if proposals to cap costs for non-domestic users are not implemented. In the absence of a cap the profitability and competitiveness of enterprises, particularly micro enterprises, and SMEs, could be significantly impacted, with follow-on implications for wider economic activity”.

Their submission also “reiterates our agreement with proposals to lower costs for business through the introduction of new treatment plant charges reflecting lower operating and capital costs of wastewater treatment plants receiving trade effluent discharges from

industrial trade effluent connections, when compared to the national average operating and capital costs of all Uisce Éireann's wastewater plants".

Enterprise Ireland also requested "service levels commensurate with tariffs" stating that "the enterprise sector provides one quarter of the funding for Uisce Éireann – the second largest contributor after direct State support. Ensuring that water and wastewater services provided to business are of high quality by international standards, commensurate with the tariffs charged, is essential to delivering a competitive environment for businesses".

A request was also made "for an extension of the current non-domestic tariff regime to October 2026 to enable businesses time to prepare and budget for any changes. Pricing should be transparent, competitive, and fair".

- *From October 2021 Non-domestic (water and wastewater) charges are billed on the harmonised non-domestic rates as approved by the CRU in July 2019. The rates have not changed since – some customers were moved to these rates immediately, while others transitioned over the period until September 2024.*
- *Trade Effluent charges remain unchanged since 2014 i.e., billed per the LA rates.*
- *The current tariff levels no longer reflect UEs cost base, while the demand on and investment needed in water and wastewater treatment continues to increase.*
- *Circa 188k connections are on the non-domestic tariff framework e.g., offices, hotels, supermarkets, nursing homes, manufacturing.*
- *Circa 6,900 customers are discharging trade effluent into the network – this can range from a pharmaceutical production site down to a car wash for example.*
- *The CRU undertook a consultation on proposed updates to the non-domestic tariff framework including alignment and harmonisation of trade effluent and published its decision for the non-domestic tariff period commencing 1 October 2024, with initial trade effluent charging to be further consulted on and included for the charging the period from 1 October 2025.*
- *We are obliged then to apply the charges as set out and from the date set down.*
- *86% of customers (162,905 connections) may see annual bill increases of less than €250; 5.4% may see increases of between €250 and €500; 7.4% may see increases of between €500 and €5,000; and less than 1% may see increases of €5,000 or more.*
- *Customers facing larger increases could also benefit from a bill-capping arrangement, if the cost of the increased tariff is more than €750.*
- *Ultimately, it's the CRU who make the final decision, we must implement their decision.*

One stakeholder stated "I think there should be public water charges as appropriate to income level and possible medical needs. This would incentivize us to conserve water. If I

have a private pool, wash my car or water a flower garden, I should be required to pay for these luxuries. Most other EU countries implement water charges”.

Uisce Éireann's priority is to provide safe, secure drinking water supplies to our customers and to treat wastewater to protect the environment. We have no view on the matter of domestic water charges – that is a matter for the Government. We are satisfied that the funding is in place at present to support our programme of capital and operational investment in line with the Uisce Éireann business plan. • Household Water Conservation: Conservation is one of three key themes set out by the Government in its Water Services Policy Statement 2018–2025. In July 2019, following a public consultation Uisce Éireann's regulator, the Commission for Regulation of Utilities (CRU), made a final decision on the 2017 Government legislation which sets a household water allowance and provides for charging customers who use above a certain threshold. This legislation set the household water allowance of 213,000 litres a year and provides for charging customers who use above this threshold, which is 1.7 times the average amount of water used by a household per year. Uisce Éireann proposed that households with more than four occupants should be able to apply for an additional water allowance and those with medical needs should be able to apply for an exemption. These proposals were accepted by the CRU. No decision has been made by the Government in relation to a date for the implementation of Household Water Conservation and the associated charging for excess use. Uisce Éireann continues to liaise with the CRU and the Government in relation to this.

Councillor Thomas Breathnach from South Kilkenny commented “I am conscious of the number of water outages in the general area covered by the Mooncoin Water Supply network. They noted a need for major investment in the pipe network to reduce these incidences. In their submission they identified six sections of the network within the Mooncoin area which need investment. These included:

- Mooncoin Water Supply: Clogga Cross – Tubrid Reservoir
- Grannagh – Lickettstown
- Clonassy Water Supply
- Portnahully
- Polerone
- Chapel Street

Councillor Breathnach's submission also referenced a cast iron pipe from the junction of the R-448 (Main Street) with the L-1042 (Mill Road) noting that this would require upsizing to ensure an adequate supply to the north end of the village if there is to be new development there.

Councillor Breathnach also commented that “the north end of the village on the R704 towards the motorway intersection is only slightly lower than the reservoir level in Clonassy so pressure is a problem there. A booster pump would be required on the public supply serving the R704 to ensure adequate pressure and volumes can be supplied”.

As part of the national Leakage Reduction Programme, Uisce Éireann is working with Local Authorities across the country to repair bursts and fix underground leaks. Our leakage reduction crews are working hard to find and fix leaks nationwide to provide a more reliable water supply. View our videos below to find out more about the Leakage Reduction Programme and what we're doing to reduce leakage across Ireland.

In Kilkenny, Uisce Éireann are prioritising the replacement of old water mains in Clogga Cross with new modern pipes. This section of works is currently moving through a detailed design. In advance of this project moving to construction Uisce Éireann will proactively communicate clear details of the project to the local community and to related stakeholders in the area”.

Councillor Micheal Doyle commented that “Wastewater upgrades across Kilkenny are needed, some are causing huge environmental damage”.

Uisce Éireann thanks Cllr Michael Doyle for his submission. As Uisce Éireann is a publicly owned, regulated, commercial State body we must operate within its Exchequer funding parameters and ensure best practice in terms of accountability, governance and delivering value for money for taxpayers for all projects.

The building, repair and upgrading of Uisce Éireann's water treatment plants, wastewater treatment plants, water and sewer network requires a multi-billion euro investment programme over many years. Our plan prioritises key outcomes such as reducing leakage, ensuring at-risk water supplies are removed from the EPA's Remedial Action List, dealing with areas where raw sewage is discharged to rivers, lakes and the sea (untreated agglomerations), and addressing areas identified by the European Court of Justice that do not comply with the Urban Waste Water Treatment Directive.

In preparing our Investment Plan, Uisce Éireann has optimised investment decisions by prioritising the best possible service improvements, while maximising value-for-money. Uisce Éireann is a regulated utility and as such has funding constraints so it must prioritise investment where it is needed most. The Capital Investment Plan was prepared within the regulatory framework which is set out in legislation. Under this framework, Uisce Éireann submits its plans in advance to our financial regulator, the Commission for Regulation of Utilities (CRU), for our proposed operational and investment spending in revenue funding "cycles". The current investment plan relates to the funding cycle referred to as "Revenue Control 3" (RC3) and covers

the period from 2020-2024. It follows an extensive CRU led stakeholder consultation process during 2018-2019. Uisce Éireann has undertaken two rounds of consultation on the capital investment plan 2025-2029. Once the Strategic Funding Plan is approved by the Minister it will be submitted to the CRU who will carry out a public consultation on the plan.

A stakeholder requested “a blue way between Ballingeary and our neighbors Inchigeela” and “to address the issues with water quality in Locha Lua”.

Another stakeholder stated, “we wish to address the sewage problems in Ballingeary”.

Ballingeary was listed in the River Basin Management Plan - Enhanced Ambition Programme as one of the sites where Feasibility studies were to be undertaken under Ireland's National Recovery and Resilience Programme (SM2). In May 2023 Stage 1 (Strategic Assessment) activities including unconstrained optioneering, demand analysis, early estimate generation, long list of feasible options and governance approvals for Ballingeary WWTP were completed. The project is currently at the Stage 2 (Preliminary Business Case). The activities to be undertaken at this stage include short list appraisal, development of concept designs; governance approvals. This Stage 2 Assessment will continue in the next investment cycle RC4 (2025 - 2029). Further information can be found on our website at River Basin Management | National Projects | Uisce Éireann (formerly Uisce Éireann).¹¹

LAWPRO noted that “the plan makes little reference to the Water Supply Project, Eastern and Midlands Region which proposes to abstract from the Shannon” They requested that this project is addressed in the plan noting that “the abstraction from the Shannon will be a major project with the potential to impact on the water quality, quantity and habitats and species dependent on them”.

Under the Strategic Aim 2 delivering reliable water services we will improve our assets and sources to ensure our supplies are robust enough to meet our customers' needs at the target level of service. The implementation and continuous review of our National Water Resources Plan (NWRP) and the four Regional Water Resources Plans are pivotal actions in our commitment to achieving the objectives of improving water supply infrastructure for resilient and robust services. Under the Eastern and Midlands Regional Water Resources Plan the Water Supply Project Eastern and Midlands Region is one of the projects outlined to deliver on this strategic aim. The Water Supply Project Eastern and Midlands Region is one of the largest and most important infrastructure projects in the history of the State and has the capacity to ensure secure sustainable water supplies for up to 50% of the population. The Water Supply Project has been approved in principle under the Government's Infrastructure Guidelines. The Water Supply Project Eastern and Midlands Region proposes to abstract a maximum of 2% of the average flow

¹¹ <https://www.water.ie/projects/national-projects/river-basin-management>

of the River Shannon at Parteen Basin downstream of Lough Derg. Treated piped 170km through counties Tipperary, Offaly and Kildare to a termination point reservoir at Peamount in County Dublin, connecting into the Greater Dublin network. This essential project will provide Dublin, Meath, Kildare and Wicklow with a resilient, safe, secure water supply. It will also create a treated water supply 'spine' across the country with the capacity to serve communities along the route in Newport, Moneygall and Borrisokane in North Tipperary, Dunkerrin and Tullamore in Offaly, and Mullingar in Westmeath. In addition, supplies currently serving Dublin can be redirected back to Louth, Meath, Kildare, Carlow and Wicklow, providing security of supply to homes and businesses, which will support growth and regional development. Currently water supply in the Eastern and Midlands region faces a number of serious challenges, notably the over-reliance on the River Liffey to supply 1.7 million people in the Greater Dublin Area. This dependence on the Liffey (and the two main treatment plants of Ballymore Eustace and Leixlip) results in a serious vulnerability to risks such as prolonged drought and/or contamination. With forecasts showing that the region will need 34% more water by 2044 than is available today, this combination of a growing water supply deficit and lack of supply resilience is not sustainable.

The project will develop a new, climate-resilient, long-term water source to meet the demands of a growing population and economy, including the need for housing and mitigating against the impacts of climate change. It will create a water spine across the country which will ensure an urban level of service. The project has been examined in the context of the outcomes of Uisce Éireann's first National Water Resources Plan and associated Regional Water Resource Plans and it remains the best solution to address the majority of the water supply needs of the Eastern and Midlands region. Following Government approval Uisce Éireann is preparing a Strategic Infrastructure Development application to An Bord Pleanála next year with construction estimated to take 4-5 years.

A stakeholder requested that Uisce Éireann “absolutely do not try to impose meters or bills for the household customers as seems to be indicated in your proposal. Push for the referendum on water remaining a public entity and push the government for guarantees in funding”.

Uisce Éireann's priority is to provide safe, secure drinking water supplies to our customers and to treat wastewater to protect the environment. We have no view on the matter of domestic water charges – that is a matter for the Government. We are satisfied that the funding is in place at present to support our programme of capital and operational investment in line with the Uisce Éireann business plan.

Household Water Conservation: Conservation is one of three key themes set out by the Government in its Water Services Policy Statement 2018–2025. In July 2019, following a public consultation Uisce Éireann's regulator, the Commission for Regulation of Utilities (CRU), made a

final decision on the 2017 Government legislation which sets a household water allowance and provides for charging customers who use above a certain threshold. This legislation set the household water allowance of 213,000 litres a year and provides for charging customers who use water above this threshold, which is 1.7 times the average amount of water used by a household per year. Uisce Éireann proposed that households with more than four occupants should be able to apply for an additional water allowance and those with medical needs should be able to apply for an exemption. These proposals were accepted by the CRU. No decision has been made by the Government in relation to a date for the implementation of Household Water Conservation and the associated charging for excess use. Uisce Éireann continues to liaise with the CRU and the Government in relation to this.

Another stakeholder made the following statement via the feedback from "Working to improve water quality of the River Bride, Blackpool".

We set out our commitments to improving the quality of Irelands water bodies under Strategic Objective 3 Protect and restore the environment. The actions set out under Strategic Aim 7 (Protecting our water environment) and Strategic Aim 8 (Playing our part under the Water Framework Directive) set out the means by which we aim to achieve our strategic objectives and aims.

An individual stakeholder commented "This has not been my experience. There are weekly outages and low-pressure issues among my constituents in West Clare leaving businesses, farmers, and families without water frequently without warning for hours or days on end. The teams on the ground are very responsive but they keep fixing the same problems. The recent EPA Report on Water Quality for both West and North Clare have been damning with no action my Uisce Éireann despite the EPA's call for these issues to be addressed."

The building, repair and upgrading of Uisce Éireann's water treatment plants, wastewater treatment plants, water and sewer network requires a multi-billion-euro investment programme over many years. Our plan prioritizes key outcomes such as reducing leakage, ensuring at-risk water supplies are removed from the EPA's Remedial Action List, dealing with areas where raw sewage is discharged to rivers, lakes and the sea (untreated agglomerations), and addressing areas identified by the European Court of Justice that do not comply with the Urban Waste Water Treatment Directive. Uisce Éireann has invested €74 million in water and wastewater infrastructure from 2014 to 2024 and will continue to invest in infrastructure and programmes in the next investment cycle from 2025-2029.

In East Clare the investment in Water Infrastructure is outlined below. In Clare, Uisce Éireann is investing in the water infrastructure and are nearing completion on works to improve the Ennistymon Public Water Supply with a €7.5 million upgrade of the Ballymacravan Water

Treatment Plant. This upgrade will include an electrical upgrade, an upgrade to existing clarifiers and filters, automated chemical dosing and upgrades to residuals treatment. This investment will ensure a safe, secure and reliable supply of drinking water to approximately 6,492 people in the region.

The Ballymacraven WTP is in the EPA's Remedial Action List and construction work is ongoing on upgrades. Mains replacement was completed in Alva Creagh in May 2024 and the Corofin WTP was removed from the EPA RAL in June 2024 following upgrade works.

Another individual stakeholder commented that Uisce Éireann should be returned to Public ownership and control.

Uisce Éireann is a commercial semi-state company delivering water services for Ireland, providing a modern utility service to support economic development. Uisce Éireann was established pursuant to the Water Services Act 2013 and is a designated activity company, limited by shares. The shareholders of Uisce Éireann are the Minister for Public Expenditure, NDP Delivery and Reform and the Minister for Housing, Local Government and Heritage and, on that basis, Uisce Éireann is a state-owned entity.

Councillor Cahill commented that the South Kerry Greenway is under construction and has the capability to attract thousands of additional visitors annually to the South Kerry. He noted that Glenbeigh village Wastewater Treatment Plant is in Stage 2 and “will take at least 5 to 7 years for this to come to fruition”. Councillor Cahill emphasised that this timeframe is not acceptable.

Uisce Éireann is advancing a project to provide additional wastewater treatment capacity in Glenbeigh as part of the Small Town and Villages Growth Programme. The project is currently at Stage 2, Preliminary Business Case: At this stage, Uisce Éireann undertakes detailed analysis, develops a short list of solutions and finds the preferred option from the short list of projects. This stage also includes estimating the total cost of the project.

The Irish Peatland Conservation Council (IPCC) in their submission highlighted how Fen is a peatland habitat that is under threat of extinction. They requested the recent NPWS Scoping Study and Pilot Survey of Fens is included and incorporated in to the final WSSP 2050. “Fen habitats should be targeted for restoration and monitoring as part of Uisce Éireann’s plan to help reverse biodiversity loss and manage the impacts of predicted climate change. Fens need to also be targeted for protection from water pollution for which they can be sensitive recipients as the additional nutrients from urban wastewater and sewage overflows cause eutrophication, altering vegetation and species assemblages”

Uisce Éireann fully recognise the importance of Fen habitat and that it is a peatland habitat that is under threat of extinction. Uisce Éireann have developed and published our Biodiversity Action Plan to ensure that our projects and activities do not impact on the biodiversity at Uisce Éireann sites, but in fact, enhance the biodiversity on Uisce Éireann sites. Our Wastewater discharges are licensed by the EPA and have set Emission Limit Values associated with those discharges to ensure that the receiving waters, and their ecology, are not impacted by our discharges.

Councillor Michael Doyle commented that “environmental issues in Kilkenny are being caused by faulty wastewater treatment systems this must be a priority fix”.

Uisce Éireann is responsible for Ireland's water and wastewater infrastructure, which includes over 1,700 water and wastewater treatment plants, over 4,000 pumping stations, and 90,000km of pipes. Despite the scale of this network, and the age and condition of much of the infrastructure we inherited, Uisce Éireann has in the past decade delivered improvements across all areas of water services. Compliance with environmental regulations for both water and wastewater are at higher levels than ever before, and new operating standards introduced by Uisce Éireann have been critical in addressing risks and minimising incidents impacting public health and the environment.

Given the scale of investment needed, identifying key priorities for investment has enabled Uisce Éireann to make significant progress in improving water and wastewater services. Highlights include 136 new wastewater treatment built or upgraded since 2014. Raw sewage discharges have been eliminated in 34 locations including large agglomerations such as Cork Lower Harbour, Bundoran and Spiddal, while projects are under construction in nine more locations, including Arklow, Co Wicklow. Other major investments currently underway include the Athlone Main Drainage Scheme and the €550 million upgrade of the Ringsend Wastewater Treatment plant which is due for completion in 2025; this will ensure that over 95 per cent of wastewater generated in Ireland's large urban areas will be treated to the required standards.

In the first River Basin Management Plan, prior to the establishment of Irish Water (now Uisce Éireann), urban wastewater was identified as the second most dominant pressure on receiving waters; this has now reduced to the fourth which is the largest sectoral achievement, and we have plans to continue this downward trend in our next investment cycle. Urban wastewater is currently identified as the dominant pressure on 197 waterbodies which represents less than 4% of all waterbodies.

We recognise that challenges exist given the age of some of the infrastructure and the scale of investment needed. Many treatment plants were built decades ago and may not have been designed to meet today's environmental standards. This makes them more susceptible to equipment failures, operational issues, and accidental discharges. We acknowledge and regret

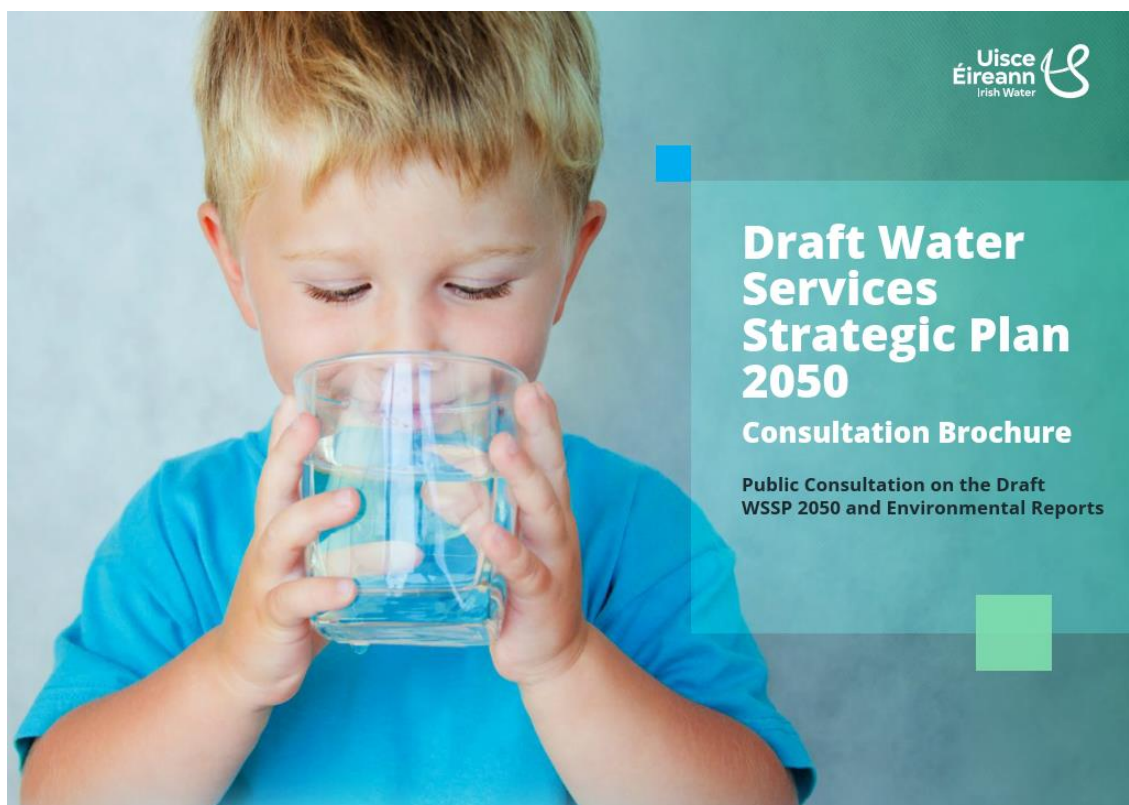
that there have been several incidents of discharges from treatment plants which have had environmental impacts. Such incidents are not acceptable and we are committed to minimising the recurrence of such incidents in the future.

To achieve this, Uisce Éireann is investing in modernizing and upgrading its infrastructure, including replacing outdated equipment and improving treatment processes. This includes much greater oversight and monitoring of water infrastructure through the introduction of telemetry which has resulted in an increase in the reporting of incidents. Previously many such incidents may have gone unreported due to the absence of standardised reporting and oversight processes. This enhanced monitoring has also enabled Uisce Éireann to identify risks and prioritise investment in areas where it is needed most.

Uisce Éireann has made significant progress in improving compliance and addressing under-investment in Ireland's water and wastewater infrastructure. In 2023 we invested €1.2 billion in water and wastewater services and we estimate it will require a minimum investment of €55-€60 billion up to 2050 to enable growth, improve compliance and increase the resilience of our assets. In Kilkenny from 2014-2024 Uisce Éireann has invested 77 million in water and wastewater infrastructure. There will be continued investment in the water and wastewater infrastructure during our next capital investment cycle from 2025-2029. Projects that Uisce Éireann have completed and are planned in Kilkenny include - Kilkenny City upgrade works on main pump stations and management of FOGS Drainage Area Plan ongoing, Kimoganny plant upgrade is at an advanced stage, Clogh the Massford Pumping Station protection works, Castlecomer Pumping Station upgrades planned, Ballyhale/Knocktoper sewer rehabilitation works completed and plant upgrade options under development and in Freshford the storm drainage was connected to the wastewater network impacting wastewater pumping stations and WWTP. Sewer upgrade works planned.

Gleann a'Phuca, Cork Rivers Group suggested it could be made easier for customers and communities to object to planning proposals on the basis of environmental concerns without incurring monetary costs. "Concerned citizens and groups like ours, which operate on a voluntary basis, are likely to not have sufficient financial resources for this purpose but should be able to exercise their right to raise concerns."

Appendix A Consultation Brochure





Consultation

Consultation 1

Consultation 1 was on the Issues Paper, SEA Scoping Report and AA Screening. This consultation ran for eight weeks from 19 September to 17 November 2023. For this consultation, Uisce Éireann engaged directly with key statutory and regulatory stakeholders. The Issues Paper summarised the key challenges influencing Uisce Éireann and the services we deliver from now to 2050. The challenges identified in the Issues Paper, along with our foresight study, Vision 2050, are the foundations that helped Uisce Éireann define long-term objectives to be presented in the draft WSSP 2050.

Consultation 2

For Consultation 2 we are now presenting the draft WSSP 2050 and associated environmental reports, which presents the challenges we face in delivering water services to 2050. We outline actions to respond to these challenges including new approaches and ways of working to tackle our future challenges.

Have your Say

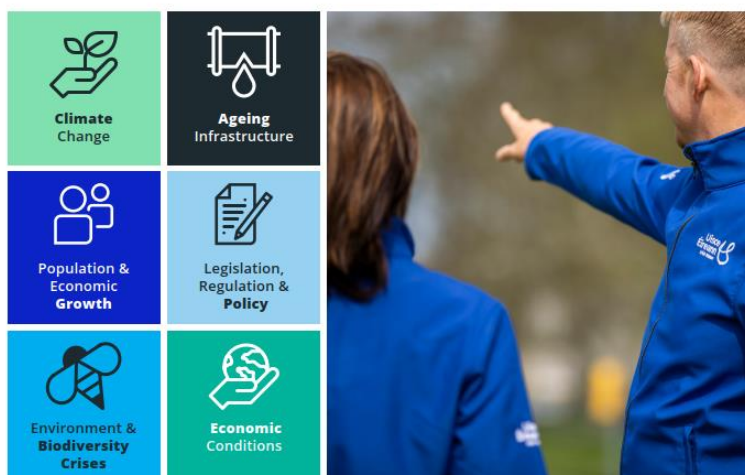
We are now looking for your input to the draft WSSP 2050 and associated environmental reports. The consultation is running for eight weeks from 21 May to 16 July 2024. As well as gathering feedback related to the draft WSSP 2050 the results of this public consultation will provide an insight into attitudes towards public water and wastewater services and the challenges we face now and into the future.

Significant challenges our water environment faces

We operate in a rapidly changing global environment that will bring enormous challenges for the delivery of water services.

Our foresight study, Vision 2050, was delivered in collaboration with a range of stakeholders and sets out desired outcomes for the water sector in Ireland to 2050 and identified challenges with the potential to have the greatest impact on delivering water services over that time-frame.

The key challenges and how they may impact our water services are detailed in our draft WSSP 2050.



How and When

Our Approach to WSSP 2050

Transforming water infrastructure and service delivery will require new approaches and new ways of working. These include: Collaboration; Systems Thinking; Adaptive Planning; Building our Culture, Empowering our People.

We will aim to adopt these approaches and ways of working to tackle our future challenges, while recognising that this will also need buy-in from our stakeholders in many instances.

What are our Strategic Objectives?

We have identified **4 strategic objectives** in the draft WSSP 2050 to address the key challenges affecting the delivery of water services to 2050.

Accompanying the four strategic objectives are **14 strategic aims** that will help us to address our most critical investment needs, respond to emerging policy requirements and capitalise on new opportunities to transform our infrastructure.

In accordance with Section 33(4) of the Water Services (No. 2) Act, 2013, we have set out the means by which we propose to achieve our strategic objectives. These are presented as 35 key actions.



Our Strategic Objectives and Aims at a glance



How we will deliver our objectives.

The WSSP 2050 sets the overarching framework for subsequent more detailed implementation plans.

The WSSP sets out our long-term objectives and our strategic direction of travel in order to achieve them. More detail is provided in our Tier 2 plans on how we aim to achieve our objectives. An example of this is our National Water Resources Plan.

How will we measure progress?

Uisce Éireann is subject to rigorous monitoring and measurement under the aegis of The Department of Housing, Local Government and Heritage which monitors performance in the water sector generally. To measure progress and assess our performance, Uisce Éireann is regulated by The CRU (Commission for Regulation of Utilities), the economic regulator which oversees UE's performance and allowed revenue. The EPA (Environmental Protection Agency) which acts as the environmental regulator, ensuring UE's compliance with EU Directives and National Regulations.



How You Can Get Involved

This public consultation presents a unique opportunity for you to engage with Uisce Éireann in the development of our 25 year strategy for the delivery of water services in Ireland.

The purpose of this consultation is to meaningfully engage with the public, particularly those with an interest in water and wastewater services, in order to better inform the content of the draft WSSP 2050 and to gather views on its strategic objectives, aims, actions, and challenges for delivering the Plan.

A series of consultation questions are posed below to guide the process. We are now looking for your input to the draft WSSP 2050 and associated environmental reports through this public consultation.

Please visit our website to read the draft WSSP 2050 and complete **a consultation survey** or use the suggested consultation questions to guide your response and submit your feedback to the consultation.



On our website you can access:

- The Draft WSSP 2050
- SEA - Environmental Report
- Natura Impact Statement
- Consultation Survey Feedback Form
- Details of all consultation events and how to register.



Guide to the draft WSSP 2050

1. **About Uisce Éireann:** This section outlines the Uisce Éireann vision, history, heritage and purpose of the Draft WSSP 2050.
2. **The Challenges we face to 2050:** We identified what we think are the most important issues likely to significantly affect Uisce Éireann over the period to 2050.
3. **Our Strategic Objectives at a Glance:** This section presents a brief overview of our strategic objectives and strategic aims
4. **Strategic Objective 1:** Safe and Reliable Drinking Water
5. **Strategic Objective 2:** Support our Customers, Community and the Economy
6. **Strategic Objective 3:** Protect and Restore our Environment
7. **Strategic Objective 4:** Sustainable Services Fit for the Future
8. **Approaches to meeting our long-term challenges:** To deliver on our strategic objectives, we will need to embrace new approaches and ways of working.
9. **Implementation:** We identify how progress will be measured and discuss our framework of strategies that we are working on separately.
10. **Review and Update:** This outlines how the WSSP will be reviewed and updated.

Consultation Questions

QUESTION 1:

In Section 4 we present our four Strategic Objectives. Do you have any comments on the Strategic Objectives and associated strategic aims and actions?

- **Strategic Objective 1:**
Safe and Reliable Drinking Water.
- **Strategic Objective 2:**
Support our Customers, Communities and the Economy.
- **Strategic Objective 3:**
Protect and Restore our Environment.
- **Strategic Objective 4:**
Sustainable Services Fit for the Future

QUESTION 2:

In Section 2 we have identified the biggest challenges we think will influence how we deliver our water services to 2050. Do you have views on these challenges?

QUESTION 3:
In section 8 we outline our approaches to meeting long-term challenges. Do you have any comments on these?

QUESTION 4:

Do you have any comments on the Strategic Environmental Assessment (SEA) Environmental Report and Natura Impact Statement (NIS), which accompany the draft WSSP 2050?

What will we do with your response?

Your feedback will be recorded, collated, analysed, and evaluated to determine appropriate changes to the draft WSSP 2050.

Please note that Uisce Éireann may publish a summary of the survey results and may also publish anonymised data from the responses received. All submissions received will be subject to the provisions of the Freedom of Information Act and Data Protection legislation.

Draft Water Services Strategic Plan 2050

At A Glance...

The Draft Water Services Strategic Plan 2050 (WSSP 2050) is our long-term strategic plan
It sets out our objectives and the means by which we aim to achieve them in the context of the significant challenges we are likely to face over the next 25 years.



Uisce Éireann Vision

A sustainable Ireland where water is respected and protected, for the planet and all the lives it supports.



...We supply 1.7 billion litres of clean water through 64,000km of pipe network and 1,763 pumping stations.
...We process 1.2 billion litres of wastewater through 1,056 treatment plants from homes and businesses.



In the draft WSSP 2050 we present the challenges we face in delivering water services to 2050

- Climate Change
- Population and Economic Growth
- Environment and biodiversity crises
- Ageing Infrastructure
- Legislation, regulation and policy
- Economic conditions



We are now looking for your input to the draft WSSP 2050 and associated environmental reports through this public consultation

- On our website you can access:
 - The Draft WSSP 2050
 - SEA - Environmental Report
 - Natura Impact Statement
- Consultation Survey Feedback Form
- Details of all consultation events and how to register.

To address these Challenges, we present 4 strategic objectives

- STRATEGIC OBJECTIVE 1**
Safe & reliable drinking water
- STRATEGIC OBJECTIVE 2**
Support our customers, communities & the economy
- STRATEGIC OBJECTIVE 3**
Protect & restore our environment
- STRATEGIC OBJECTIVE 4**
Sustainable services fit for the future

Accompanying the **4 strategic objectives** are **14 strategic aims** and **35 actions** by which we propose to achieve our strategic objectives.



Timeline to date

Autumn 2023

Consultation 1 on the Issues Paper, SEA Scoping and AA Screening.

Summer 2024

Consultation 2 on the draft WSSP 2050 & associated environmental reports.

Autumn 2024

Finalise the WSSP 2050, Issue for Ministerial Approval

Spring 2025

Publish WSSP 2050



Implementation

- The WSSP 2050 sets out our long-term objectives and our strategic direction of travel in order to achieve them. More detail is provided in our Tier 2 plans on how we aim to achieve our objectives. An example is our Biodiversity Action Plan.
- To measure progress and assess our performance, Uisce Éireann is regulated by our economic regulator the CRU (Commission for Regulation of Utilities) and the EPA (Environmental Protection Agency), our environmental regulator.
- The WSSP 2050 will be reviewed every 5 years.



Have your say...

Public Consultation
21 May - 16 July 24

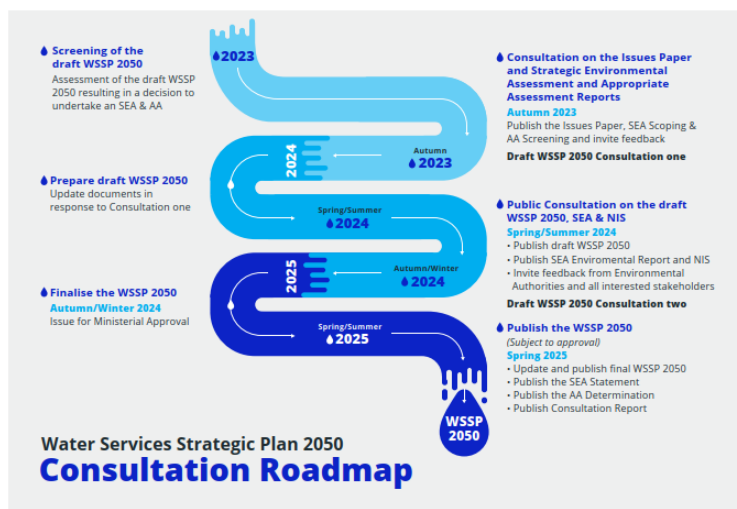
Next Steps

Following the conclusion of this consultation, Uisce Éireann will review and consider feedback received from all stakeholders. The submissions and observations received from public consultation will be taken into consideration, and the draft WSSP 2050 updated.

Following Ministerial approval, the final WSSP 2050 will be adopted in early 2025, alongside the SEA Statement and AA Determination. The SEA statement will outline the issues raised and demonstrate the amendments that were made to the WSSP 2050 as a result of the consultation.

The WSSP 2050 will undergo regular reviews, every five years, to ensure its continued relevance. These reviews will allow us to adapt to changing circumstances and evolving needs.

Updates to the WSSP 2050 will be informed by changes in legislation related to water services and better information, especially on asset performance, demographics, and climate change.



Appendix B

Consultation

Feedback Form

Public Consultation Survey Draft Water Services Strategic Plan 2050

Summer 2024

Public Consultation Survey

* Required

Introduction

Welcome to the survey for Uisce Éireann's draft Water Services Strategic Plan 2050 (WSSP 2050). The Draft Water Services Strategic Plan 2050 is our long-term strategic plan. It sets out our objectives and the means by which we aim to achieve them in the context of the significant challenges we are likely to face over the next 25 years.

The purpose of this consultation is to meaningfully engage with the public, particularly those with an interest in water and wastewater services, in order to better inform the content of the draft Water Services Strategic Plan 2050 and to gather views on our strategic objectives, actions, and on challenges for delivering the Plan.

A series of questions are posed below, to guide the process, though all views on all aspects of our services and how we can best protect and value water are welcome.

The closing date for submissions is 16 July 2024.

Submissions can also be sent by email to wsssp@water.ie or by post to Water Services Strategic Plan, Uisce Éireann, P.O. Box 13216, Glenageary, Co. Dublin.

All documents, including the Draft Water Services Strategic Plan 2050, Strategic Environmental Assessment and Natura Impact Statement are available to view and download at <https://www.water.ie/wsssp>.

Personal Details - Optional

Uisce Éireann fully respects your right to privacy.

Any personal information which you volunteer will be treated securely and confidentially in accordance with the Data Protection Acts 1988-2018 and the General Data Protection Regulation (GDPR). For more information visit our privacy policy <https://www.water.ie/privacy-notice/>

Your submission remains anonymous and your email address will not be stored or linked to your response.

1. Tell us about yourself

Name:

2. I am making this submission in my capacity as a: *

(Please tick all that apply)

- ☐ Member of the Public
- ☐ Environmental Group
- ☐ Statutory Organisation
- ☐ Student
- ☐ Public Representative
- ☐ Resident's Association / Community Group
- ☐ Organisation

3. What age group do you belong to? *

(Please tick the appropriate box)

- ☐ 15-24
- ☐ 25-29
- ☐ 30-39
- ☐ 40-49
- ☐ 50-64
- ☐ 65 and over
- ☐ Prefer not to say

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Public Consultation Survey Draft Water Services Strategic Plan 2050

4. What province are you from, please tick as appropriate *

- ☐ Munster
- ☐ Leinster
- ☐ Connaught
- ☐ Ulster
- ☐ Other

Questions relating to the overall plan.

5. What in your view is the most important thing the draft Water Services Strategic Plan 2050 needs to deliver? *

On a scale of 1-4 please rank accordingly.

Safe and Reliable Drinking Water
Support our Customers, Communities and the Economy
Protect and Restore our Environment
Sustainable Services Fit for the Future

6. In Section 3 we have identified the biggest challenges we think will influence how we deliver our water services to 2050. *

Please rate the degree to which you agree or disagree.

	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree
Climate Change	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Growing population and economy	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Environmental and biodiversity crises	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Ageing infrastructure	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Legislation, regulation and policy	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Economic conditions	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

In Section 4 we introduce our four Strategic Objectives.

7. Strategic Objective 1: Safe and Reliable Drinking Water

We ensure the quality of our water supplies are safe and appropriate for use, and we deliver a water service that communities, businesses and the broader economy can rely on.

Do you have any specific feedback on Strategic Objective 1 and associated strategic aims and actions?

8. Strategic Objective 2: Protect and restore our environment

We deliver a reliable water and wastewater management service that protects the environment, and we support a healthy environment by enhancing habitats and ecosystems.

Do you have any specific feedback on Strategic Objective 3 and associated strategic aims and actions?

9. Strategic Objective 3: Support our customers, communities and the economy

We provide an excellent service to our customers, and work with our stakeholders to deliver aligned priorities and support sustainable growth.

Do you have any specific feedback on Strategic Objective 3 and associated strategic aims and actions?

10. Strategic Objective 4: Resilient services fit for the future

We make decisions for the long-term which enable us to adapt and ensure our assets remain resilient.

Do you have any specific feedback on Strategic Objective 4 and associated strategic aims and actions?

11. If you are an organisation, are there any actions in the draft WSSP 2050 that you are interested in collaborating on?

Section 5 any other feedback.

12. Do you have any comments on the Strategic Environmental Assessment (SEA) Environmental Report and Natura Impact Statement, which accompany the draft Water Services Strategic Plan 2050?

13. Do you have any other feedback that you would like us to consider when forming our Draft Water Services Strategic Plan 2050?

14. On a scale of 1-10, with 1 being 'completely disagree' and 10 being 'completely agree'; do you agree the draft Water Services Strategic Plan 2050 adequately outlines the steps we need to take manage the challenges we face delivering water and wastewater services to 2050? *

0	1	2	3	4	5	6	7	8	9	10
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completely disagree

completely agree

Appendix C Infographic

Draft Water Services Strategic Plan 2050

At A Glance...

The Draft Water Services Strategic Plan 2050 (WSSP 2050) is our long-term strategic plan

It sets out our objectives and the means by which we aim to achieve them in the context of the significant challenges we are likely to face over the next 25 years.



Uisce Éireann Vision

A sustainable Ireland where water is respected and protected, for the planet and all the lives it supports.



...We supply 1.7 billion litres of clean water through 64,000km of pipe network and 1,763 pumping stations.

...We process 1.2 billion litres of wastewater through 1,056 treatment plants from homes and businesses.



In the draft WSSP 2050 we present the challenges we face in delivering water services to 2050

- Climate Change
- Population and Economic Growth
- Environment and biodiversity crises
- Ageing Infrastructure
- Legislation, regulation and policy
- Economic conditions



We are now looking for your input to the draft WSSP 2050 and associated environmental reports through this public consultation

- On our website you can access:
 - The Draft WSSP 2050
 - SEA - Environmental Report
 - Natura Impact Statement
- Consultation Survey Feedback Form
- Details of all consultation events and how to register.

To address these Challenges, we present 4 strategic objectives

STRATEGIC OBJECTIVE 1
Safe & reliable drinking water

STRATEGIC OBJECTIVE 2
Support our customers, communities & the economy

STRATEGIC OBJECTIVE 3
Protect & restore our environment

STRATEGIC OBJECTIVE 4
Sustainable services fit for the future

Accompanying the **4 strategic objectives** are **14 strategic aims** and **35 actions** by which we propose to achieve our strategic objectives.



Timeline to date

Autumn 2023

Consultation 1 on the Issues Paper, SEA Scoping and AA Screening.

Summer 2024

Consultation 2 on on the draft WSSP 2050 & associated environmental reports.

Autumn 2024

Finalise the WSSP 2050, Issue for Ministerial Approval

Spring 2025

Publish WSSP 2050



Implementation

- The WSSP 2050 sets out our long-term objectives and our strategic direction of travel in order to achieve them. More detail is provided in our Tier 2 plans on how we aim to achieve our objectives. An example is our Biodiversity Action Plan.
- To measure progress and assess our performance, Uisce Éireann is regulated by our economic regulator the CRU (Commission for Regulation of Utilities) and the EPA (Environmental Protection Agency), our environmental regulator.
- The WSSP 2050 will be reviewed every 5 years.



Have your say...

Public Consultation

21 May - 16 July 24

Appendix D Press Release

Uisce Éireann seeks public feedback on its draft Water Services Strategic Plan 2050

- The draft Water Services Strategic Plan 2050 is Uisce Éireann's long-term strategic plan to support growth, protect the environment and deliver resilient water services for our customers for the next 25 years.
- It sets out our objectives, and the means by which we aim to achieve them while taking into account significant challenges such as climate change, population and economic growth, environmental and biodiversity crisis, legalisation, regulation and policy changes, economic conditions and aging infrastructure.
- Public Consultation runs from 21 May 2024 to 16 July 2024

EMBARGOED TO 00:01 May 21, 2024 - Uisce Éireann today begins an eight-week public consultation on the draft Water Services Strategic Plan 2050 (WSSP 2050). The draft WSSP 2050 is Uisce Éireann's long-term strategic plan which is required to be prepared under the Water Services No. 2 Act 2013. The plan outlines the strategic direction and the actions the utility will implement to ensure sustainable public water services for Ireland. Once approved by the Minister, it will replace the existing WSSP from 2015, which covered the period from 2015 to 2040.

The draft WSSP 2050 has been subjected to Strategic Environmental Assessment (SEA) in accordance with the European Union (EU) SEA Directive (2001/42/EC) and Appropriate Assessment (under the EU Habitats Directive) and these documents are also published for review on Uisce Éireann's website (www.water.ie) as part of this consultation.

Providing safe, secure and sustainable water services is vital for society, to protect public health, support the delivery of housing and jobs, and to protect the environment and precious water resources. Uisce Éireann has a vital job to do and many challenges and opportunities as we look ahead to 2050. This 25-year strategy, the Water Services Strategic Plan 2050 is one of a suite of plans and policy documents guiding the delivery of water and wastewater services in Ireland.

This public consultation presents an opportunity for everyone to engage with Uisce Éireann in the development of our 25 year strategy for the delivery of water services in Ireland. As well as gathering feedback related to the draft WSSP 2050 the results of this public

consultation will provide an insight into attitudes towards public water and wastewater services and the challenges we face now and into the future.

Sean Laffey, Head of Asset Management with Uisce Éireann, commented, "We operate in a rapidly changing global environment that will bring enormous challenges for the delivery of water services including climate change, population and economic growth, environmental and biodiversity crisis, legislation, regulation and policy changes, economic conditions and aging infrastructure. Strong partnerships underpin our approach to planning for the future, with the aim of delivering mutual benefits and value. Through the delivery of our draft WSSP 2050, we will build on the legacy of our local authority water services heritage, working with our customers, communities, and stakeholders to enhance our shared environment and support social and economic development. We aim to lead by example and embrace research and innovation, integrating new technologies and sustainable practices to secure safe and reliable water supply into the future while protecting the environment.

"The Water Services Strategic Plan is an important document that will set out how we will manage Ireland's water and wastewater services for the next quarter century. This critical infrastructure will underpin economic development and housing delivery, while safeguarding public health and enhancing the environment, enabling communities to thrive. We are inviting all our stakeholders and members of the public to have their say in relation to how these essential services are managed and delivered, for the benefit of customers and communities throughout Ireland."

Uisce Éireann is now seeking feedback on the draft WSSP 2050 and associated environmental reports; the SEA Environmental Report and the Natura Impact Statement. All documents are available to view and download from www.water.ie/wssp

An eight-week public consultation will run from 21 May 2024 to 16 July 2024.

Stakeholders can avail of two options to assist them to make a submission on the draft WSSP 2050 and are welcome to choose one or both options when making a submission.

Option 1: Complete an online survey.

Option 2: Provide feedback on suggested consultation questions.

Submissions can be made up to the closing date of the consultation period, by email or post to:

Email: wssp@water.ie

Post: Water Services Strategic Plan, Uisce Éireann, PO Box 13216, Glenageary, Co. Dublin.

Online webinars will be facilitated in June 2024. These webinars will provide information on the draft WSSP 2050 and allow opportunities to pose questions to inform submissions. Register for the webinars via the project website www.water.ie/wssp

Following the conclusion of this consultation, Uisce Éireann will review and consider feedback received from all stakeholders. The submissions and observations received from public consultation will be taken into consideration, and the draft WSSP 2050 updated.

ENDS

For media queries please contact press@water.ie

Notes to editor

The weblink above (www.water.ie/wssp) will be live from midnight on May 21

Consultation process to date:

Consultation 1 was on the Issues Paper, SEA Scoping Report and AA Screening. This consultation ran for eight weeks from 19 September to 17 November 2023. For this consultation, Uisce Éireann engaged directly with key statutory and regulatory stakeholders. The Issues Paper summarised the key challenges facing Uisce Éireann and the services we deliver from now to 2050. The challenges identified in the Issues Paper, along with our foresight study, Vision 2050, are the foundations that helped Uisce Éireann define long-term objectives to be presented in the draft WSSP 2050.

CAPTIONS:

1. Uisce Éireann has launched an eight-week public consultation on the draft Water Services Strategic Plan 2050 (WSSP 2050) which outlines the strategic direction and the actions required to ensure sustainable public water services for Ireland. Pictured is the Lough Guitane Water Treatment plant in Kerry

2. Uisce Éireann has launched an eight-week public consultation on the draft Water Services Strategic Plan 2050 (WSSP 2050) which outlines the strategic direction and the actions required to ensure sustainable public water services for Ireland.
Pictured is the Shanganagh-Bray wastewater treatment plant

Appendix E

Newspaper Advert

Foilsíonn Uisce Éireann Dréachtphlean Straitéiseach um Sheirbhísí Uisce 2050

Comhairliúchán Poiblí

Foilsíonn Uisce Éireann Dréachtphlean Straitéiseach um Sheirbhísí Uisce 2050 (PSSU 2050) le haghaidh comhairliúcháin. Leagtar amach i ndráacht PSSU 2050 na dúshláin atá romhainn agus na gníomhartha a dhéanfaimid chun ár bhfís suas go dtí an bhliain 2050 a fhíorú, is é sin Éire a bheith inbhuanaithe. Is é ár bplean straitéiseach fadtéarmach é lena dtacófar le fás, lena ndéanfar an timpeallacht a chosaint agus lena gcuirfear seirbhísí athléimneacha uisce ar fáil dár gcustaiméirí as seo go ceann 25 bliain eile. Breithneoidh sé freisin conas is féidir linn na cuspóirí seo a bhaint amach sa ghearrthéarma agus sa mheántéarma agus cad is gá dúinn díriú air chun rath fadtéarmach a bhaint amach.

Tá comhairliúchán poiblíocht seachtaine ar siúl faoi láthair, ag feidhmiú idir an 21 Bealtaine agus an 29 Iúil 2024, chun treoir a thabhairt d'fhorbairt dhráacht-PSSU 2050. Gheobhaimid aiseolas maidir le PSSU 2050 ag an gcomhairliúchán poiblí seo, agus chomh maith leis sin, tabharfaidh na torthaí léargas dúinn ar dhearccháin i leith seirbhísí uisce poiblí agus fuioilluisce agus ar na dúshláin atá romhainn faoi láthair agus a bheidh romhainn amach anseo.

Cuireann Uisce Éireann fáilte roimh aiseolas ón bpobal agus ó gheallsealbhoirí leasmhara ar an dréachtphlean agus tuarascálacha comhshaoil gaolmhara atá ar fáil ar shuíomh gréasáin Uisce Éireann.

Tabhair cuairt ar ár suíomh gréasáin trínár gcód MF thíos chun dréacht-PSSU 2050 a léamh agus chun suirbhé comhairliúcháin a chomhlánú nó bain úsáid as na ceisteanna comhairliúcháin molta mar threoir agat chun freagra a scríobh agus ansin seol d'aiseolas isteach ar an gcomhairliúchán. Is féidir tuairimí agus aiseolas a sheoladh chuig Uisce Éireann freisin trí ríomhphost, ar an teileafón nó trí phost.

Ríomhphost: wssp@water.ie

Post: An Plean Straitéiseach um Sheirbhísí Uisce, Uisce Éireann, P.O. Oifig Poist 13216, Gleann na gCaorach, Co. Bhaile Átha Cliath

Saorghlao: 1800 46 36 76



Déanfar gach aighneacht a gheofar roimh an spriocdháta a mheas agus glacfar le haiseolas ábhartha isteach sa PSSU 2050 deiridh do réigiún an Iardheiscirt, a fhoilseofar in 2025, in éineacht leis an Ráiteas MST.

Óstálfadh Uisce Éireann sraith de sheimineáir ghréasáin don phobal i mí Iúil agus i mí an Mheitheamh 2024 chun an dréachtphlean PSSU 2050 agus na tuarascálacha timpeallachta gaolmhara a chur i láthair. Tabhair cuairt ar an suíomh gréasáin chun clárú.

Uisce Éireann publishes Draft Water Services Strategic Plan 2050

Public Consultation

The Draft Water Services Strategic Plan 2050 (WSSP 2050) is our long-term strategic plan. It sets out our objectives and the means by which we aim to achieve them in the context of the significant challenges we are likely to face over the next 25 years.

An eight-week public consultation is now underway, running from 21 May to 16 July 2024, to inform the development of the draft WSSP 2050. As well as gathering feedback related to the draft WSSP 2050 the results of this public consultation will provide an insight into attitudes towards public water and wastewater services and the challenges we face now and into the future.

Uisce Éireann is inviting feedback from members of the public and interested stakeholders on the draft WSSP 2050 and associated environmental reports which are available on the Uisce Éireann website.

Please visit our website through the QR code below, to read the consultation documents and complete a consultation survey or use the suggested consultation questions to guide your response and submit your feedback. Comments and feedback can also be sent to Uisce Éireann via, email, phone or post.

Email: wssp@water.ie

Post: Water Services Strategic Plan, Uisce Éireann, P.O. Box 13216, Glenageary, Co. Dublin

Freephone: 1800 46 36 76



All submissions received before the deadline will be reviewed and relevant feedback will be incorporated into the final WSSP 2050, which will be published in 2025, alongside the SEA Statement.

Uisce Éireann will host a series of webinars for members of the public in June 2024 to present the draft WSSP 2050 plan and associated environmental reports. To register visit the website at <https://www.water.ie/wssp>.

Ag cur seirbhísí uisce ar fáil d'Éirinn



Delivering water services for Ireland



Appendix F Planning Counters

Local Authority	Location	Address
Carlow County Council	Planning Department	Carlow County Council, Athy Road, Carlow, R93 E7R7
Cavan County Council	Planning Department	Cavan Courthouse, Farnham Street, Cavan, H12 R6V2
Clare County Council	Planning Department	Áras Contae an Chláir, New Road, Ennis, Co. Clare, V95 DXP2
Cork City Council	Planning Department	City Hall, Anglesea Street, Cork, T12 T997
Cork County Council	Planning Department	Cork County Council Headquarters, Ground Floor, County Hall, Carrigrohane Road, Cork, Ireland, T12 R2NC
Donegal County Council	Public Service Building	County House, The Diamon, Lifford, Co. Donegal, F93 Y622

Dublin City Council	Planning Department	Civic Offices, Wood Quay, Dublin 8, D08 RF3F
Dun Laoghaire Rathdown County Council	Planning Department	County Hall, Marine Road, Dun Laoighaire, Co.Dublin
Fingal County Council	Customer Care Unit	County Hall, Main Street, Swords, County Dublin, K67 X8Y2 & Blanchardstown Civic Offices, Grove Road, Blanchardstown, Dublin 15, D15 W638
Galway City Council	Planning Department	City Hall, College Road, Galway, H91 X4K8
Galway County Council	Planning Department	Áras an Chontae, Prospect Hill, Galway, H91 H6kX
Kerry County Council	Planning Department	Co Buildings, Rathass, Tralee, Co. Kerry, V92 H7VT
Kildare County Council	Planning Department	Head Office, Áras Chill Dara, Devoy Park, Naas, Co Kildare, W91 X77F
Kilkenny County Council	Planning Department	Kilkenny County Council, County Hall, John Street, Kilkenny R95 A39T

Laois County Council	Planning Department	Áras an Chontae, JFL Ave., Portlaoise, Co. Laois, R32 EHP9
Leitrim County Council	Planning Department	Áras An Chontae, St. Georges Terrace, Carrick on Shannon, Co Leitrim, N41 PF67
Limerick County Council	Planning Department	Floor 1, Limerick City and County Council, Dooradoyle Road, Dooradoyle, Limerick, V94 WV78
Longford County Council	Planning Department	Aras an Chontae, Great Water Street, Longford, N39 NH56
Louth County Council	Customer Services	Town Hall, Crowe Street, Dundalk, Co. Louth, A91 W20C
Mayo County Council	Planning Department	Áras an Chontae, The Mall, Castlebar, County Mayo, F23 WF90
Meath County Council	Planning Department	Buvinda House, Dublin Road, Navan, County Meath, C15 Y291
Monaghan County Council	Planning Department	1 Dublin Street, Monaghan, H18 X982
Tipperary County Council	Planning Department	Civic Offices, Nenagh, Co. Tipperary, E45A099 &

		Civic Offices, Emmetts Street, Clonmel, Co. Tipperary, E91 D426
Offaly County Council	Planning Department	Áras an Chontae, Charleville Road, Tullamore, Co. Offaly, R35 F893
Roscommon County Council	Planning Department	Áras an Chontae, Roscommon Town. F42 VR98.
Sligo County Council	Planning Department	Sligo City Hall, Quay St, Abbeyquarter North, Sligo, F91 PP44
South Dublin County Council	Planning Department	County Hall, Tallaght, Dublin 24, D24 A3XC
Waterford County Council	Library	Gracedieu Rd, Carrickphierish, Co. Waterford, X91 NN9F
Westmeath County Council	Planning Department	Áras an Chontae, Mount Street, Mullingar, Co. Westmeath, N91 FH4N
Wexford County Council	Planning Department	Block B, County Hall, Carricklawn, Wexford, Y35 WY93
Wicklow County Council	Planning Department	County Buildings, Whitegates, Wicklow Town, A67 FW96

Appendix G

Stakeholder Email

Subject Line: Consultation on the draft Water Services Strategic Plan 2050 is now open.

Dear Stakeholder,

The Draft Water Services Strategic Plan 2050 (WSSP 2050) is our long-term strategic plan. It sets out our objectives and how we aim to achieve them in the context of the significant challenges we are likely to face over the next 25 years. We are now looking for your input to the draft Water Services Strategic Plan 2050, the Strategic Environmental Assessment Environmental Report and the Natura Impact Statement. All submissions will be reviewed and taken into consideration. Following Ministerial approval, the final Water Services Strategic Plan 2050 will be adopted in 2025 along with the SEA Statement and AA Determination.

An eight-week consultation on the draft Water Services Strategic Plan 2050 and associated environmental reports will run from 21 May to 16 July 2024.

Documents are available to view and download from
<https://www.water.ie/projects/strategic-plans/water-services-strategic/>

Submissions, or observations can be made up to the closing date of the consultation period, by email or post to:

Email: wssp@water.ie

Post: Water Services Strategic Plan, Uisce Éireann, PO Box 13216, Glenageary, Co. Dublin.

Stakeholders can avail of two options to assist them to make a submission on the draft Water Services Strategic Plan 2050. Stakeholders are welcome to choose one or both options when making a submission. However, these are just an aide and all relevant submissions received in response to the consultation will be considered.

Option 1: Stakeholders are invited to complete this online survey

Option 2: Stakeholders are also invited to provide feedback on the following consultation questions.

Question 1: In Section 4 we present our four Strategic Objectives. Do you have any comments on the Strategic Objective and associated strategic aims and actions?

Strategic Objective 1: Safe and Reliable Drinking Water

Strategic Objective 2: Protect and restore our environment.

Strategic Objective 3: Support our customers, communities and the economy.

Strategic Objective 4: Resilient services fit for the future.

Question 2: In Section 2 we have identified the biggest challenges we think will influence how we deliver our water services to 2050. Do you have views on these challenges?

Question 3: In section 8 we outline our approaches to meeting long term challenges. Do you have any comments on these?

Question 4: Do you have any comments on the Strategic Environmental Assessment Environmental Report and Natura Impact Statement, which accompany the draft Water Services Strategic Plan 2050?

Uisce Éireann would like to invite you to a shared online briefing on Wednesday 19 or Wednesday 26 June to answer any questions you may have that will assist you in making a submission. **Please register for either webinar via this link:** XXX

Uisce Éireann will be holding public webinars on Wednesday 29 May and Wednesday 5 June 2024 to answer any questions you may have that will assist you in making a submission. Registration for the briefings can be done through the following link XX.

Yours sincerely,

WSSP Team

Appendix H

Briefings/Webinars

Stakeholder	Date
Public Webinar 1	29/05/2024
Public Webinar 2	05/06/02024
An Forum Uisce	06/06/2024
Commission for Regulation of Utilities	11/06/2024
Group Briefing 1 – Interested Stakeholders	19/06/2024
Group Briefing 2 – Interested Stakeholders	20/06/2024
Oireachtas Members	02/07/2024