

# Sustainable Water Network (SWAN)

- Response to Public Consultation -

**Water Services Strategic Plan (WSSP)**



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## 1. INTRODUCTION TO SWAN

The Sustainable Water Network (SWAN) is an umbrella network of 25 of Ireland's leading environmental NGOs, national and regional, working together to protect and enhance Ireland's aquatic resources through coordinated participation in the implementation of the Water Framework Directive (WFD), the Marine Strategy Framework Directive (MSFD) and other water-related policy and legislation. SWAN member groups are listed in Appendix I.

## 2. INTRODUCTION TO THIS SUBMISSION

SWAN's welcomes the publication of the draft Water Services Strategic Plan 2050 and the opportunity to comment on it. This document is informative and well presented. The setting out of specific actions and the use of graphics also makes the key messages regarding what is proposed in the Plan clear. Less use of industry jargon would further enhance accessibility.

SWAN broadly agrees with the key strategic aims identified in the WSSP, however we do not believe there is sufficient emphasis on Uisce Eireann meeting its WFD objectives. With almost 200 waterbodies significantly polluted by urban wastewater discharges, there is an urgent need to address this, and SWAN does not believe that such urgency is reflected in the draft WSSP.

Furthermore, SWAN believes 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.

## 3. RESPONSE TO QUESTIONS

### 4.1 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?

#### 4.1.1 Strategic Aim 1: Ensure Safe Drinking Water

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

SWAN welcomes a dedicated action in relation to catchment management measures. However, we believe more emphasis should be placed on integrated catchment management at the full catchment scale, including examining land uses and engaging with landowners to incentivise practises that minimise pollution and as the WSSP states, the need for " *complex, costly and unsustainable end-of-pipe solutions for deteriorating sources.*" This approach should focus on nutrient run-off and THMs in addition to pesticides. This approach needs to go beyond expansion of pilot projects as suggested, so that it is the approach in all catchments. We support AFU's recommendation that this approach should take place in ALL catchments and must include engagement and collaboration with stakeholders.

## 4.1.2 Strategic Aim 3. Conserving our precious resources

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

While we welcome the commitment to water conservation and public awareness initiatives around this, we believe there is excessive emphasis on personal customer behaviour. The statement that “*We will continue to explore opportunities for Rainwater Harvesting and the Circular Use of Water..*” is imbedded in the text whereas we believe UE 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, and that this should be reflected in the action.

## 4.1.3 Strategic Aim 3: Protecting our water environment

*Introduction*

Given that the text in this section includes the proviso “*..subject to economic and technical feasibility..*”, we recommend that the commitment in the text box for this strategic aim be amended so as to remove “we aim to..” as follows:

*“In the period to **2050**, subject to economic and technical feasibility, we **shall** ~~aim to~~:*

- *Ensure that our water and wastewater services will achieve our obligations under the Water Framework Directive.*
- *Play a strong part to support Ireland’s national objective to achieve the Water Framework Directive environmental objectives.*
- *Manage our assets and activities to have biodiversity net gain.”*

The only situation in which not achieving your obligations under the WFD, per Article 4, is if the measures are disproportionately costly or technically infeasible, which is already covered in the condition included in the current text. Therefore, these proposed actions should not be aims, rather commitments. It is also important to note that only once basic measures have been implemented fully, i.e. full compliance with the Urban Wastewater Directive, can UE consider applying exemptions to the meeting of WFD objectives.

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

We do not believe that it is acceptable to say that the Wastewater Strategy Framework will “*aim for.... playing our part in delivering Water Framework Directive objectives by meeting compliance with our Wastewater Discharge Authorisations*”. In the first instance, it is not sufficient to ‘aim for’ delivering WFD objectives (see 4.1.4 below) and furthermore UE must do everything necessary to meeting WFD objectives, including measures beyond meeting compliance with Wastewater Discharge Authorisations. The text - maybe unintentionally - suggests that just meeting compliance with these authorisations would be sufficient in this regard.

## 4.1.4 Strategic Aim 8: Playing our part under the Water Framework Directive

SWAN welcomes a strategic aim specifically focused on the Water Framework Directive. However, we firmly believe the language of the strategic aim needs to be strengthened to reflect a far stronger commitment than “*Playing our part*”. In this regard we support 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, in particular the requirement in the former that,

*“A public authority shall not, in the performance of its functions, undertake those functions in a manner that knowingly causes or allows deterioration in the chemical status or ecological status (or ecological potential as the case may be) of a body of surface water.”*

We support AFU’s recommendation that Strategic Aim 8 is updated to *“Achieving our obligations under the Water Framework Directive”*. This provides a much clearer focus and commitment in the Water Services Strategic Plan to address the 197 waterbodies that currently do not meet WFD objectives due to urban wastewater pressures.

*Action 3.4: Protect and restore water bodies through collaboration.*

While we of course support a multi-sector integrated approach to catchment management, in particular in the context of source protection, in relation UE’s above obligations under the WFD and the fact that wastewater discharges are a significant pressure in 197 waterbodies, we are concerned that there is an over-emphasis under this action on other sectoral pressures. While it is acknowledged that agriculture and forestry are also significant issues, the focus of this action of the WSSP must be the halting of all polluting discharges from UE. Therefore, we recommend that a clear commitment is included to halt pollution by UE of the 197 impacted waterbodies and that the wording of the action is amended to the following:

*“Protect and restore all water bodies for which urban wastewater discharges are a significant pressure in line with WFD obligations, and halt all discharges of raw sewage”*

(See also point under 4.1.3 above in relation to the WFD)

#### **4.1.5 Strategic Aim 9. Contributing to positive biodiversity**

*Action 3.7: Manage our assets to have biodiversity ‘Net Gain’.*

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). SWAN recommends that there is a far clearer commitment in the WSSP to conduct UE operations in 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 not specific actions in this regard in the UE Biodiversity Action Plan.

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

SWAN recommends that the water quality aspects of climate change be further emphasised in the Climate Change challenge, in particular in relation to the ecological and other impacts of low flows and higher temperatures and how UE operations, in terms of abstractions and assimilative capacity of receiving waters, will have to take this into account.

## **APPENDICES**

## Appendix I: SWAN Member Organisations & Board of Directors

SWAN National Groups		SWAN Regional & Local Groups	
1.	An Taisce	15.	Carra Mask Corrib Water Protection Group
2.	Bat Conservation Ireland		
3.	Birdwatch Ireland	16.	Cavan Leitrim Environmental Awareness Network
4.	Coastal Concern Alliance		
5.	Coastwatch Europe Network		
6.	Coomhola Salmon Trust Ltd.	17.	Celebrate Water
7.	Eco-UNESCO	18.	Cork Environmental Forum
8.	Friends of the Earth	19.	Cork Nature Network
9.	Friends of the Irish Environment	20.	Dodder Action
10.	Irish Peatland Conservation Council	21.	Longford Environmental Alliance
11.	Irish Seal Sanctuary	22.	Macroom District Environmental Group
12.	Irish Whale and Dolphin Group	23.	River Shannon Protection Alliance
13.	Irish Wildlife Trust	24.	Save The Swilly
14.	Voice Of Irish Concern for the Environment (VOICE)	25.	Slaney River Trust

<b>SWAN Board of Directors:</b>	
Mindy O'Brien, Chair & Company Secretary	Voice of Irish Concern for the Environment (VOICE)
Karin Dubsy, Director	Coastwatch Europe
Elaine McGoff, Vice Chair	An Taisce
John Armstrong	Cork Nature Network
Ignatius Egan	Carra Mask Corrib Water Protection Group