

Response to Public consultation on the Significant Water Management Issues for the Fourth Cycle Water Action Plan 2028- 2033

Prepared in keeping with the Department of Housing, Local Government and Heritage consultation response template.

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Sustainable Water Network (SWAN)

Sustainable Water Network (SWAN) is an umbrella network with 26-member environmental NGOs. We work to advocate for the protection and restoration of Irish freshwater, transitional, coastal and marine waters. We play an active role as stakeholders and in water stewardship both at the national and EU level. We are members of European eNGO networks including the European Environmental Bureau (EEB) and Seas at Risk. SWAN welcomes the opportunity to provide policy recommendations on the Significant Water Management Issues for the Fourth Cycle Water Action Plan. SWAN has been actively engaged in WFD and other water policy implementation since 2004 and currently represents the environmental sector on the Uisce Éireann Stakeholder Forum and An Foram Uisce.

Introduction to submission

SWAN welcomes the opportunity to comment on the public consultation on the Significant Water Management Issues for the Fourth Cycle Water Action Plan 2028–2033.

SWAN has been actively engaged in Water Framework Directive implementation for more than two decades.

This submission reflects the views of the network members and is the result of SWAN research, the outputs from a member workshop in March 2026 (and earlier workshops as part of the third RBMP cycle) and email consultation with members. This submission also draws on SWAN's previous Water Framework Directive submissions, including SWAN's third-cycle Significant Water Management Issues submission, which called for a science-based plan, clear links between pressures and measures, evaluation of the efficacy of national initiatives, public participation, stronger governance and supplementary measures for all water bodies requiring them. Many of those asks remain outstanding or only partially delivered. They must now be carried forward into the fourth cycle as implementation requirements, not aspirational recommendations.

Taking on board experience from previous cycles, this submission is structured to make SWAN's key asks as clear and actionable as possible. It focuses in particular on the issues that remain insufficiently addressed or only partially addressed under the third Water Action Plan and which must now be strengthened in the fourth cycle.

Ireland's failure to achieve WFD objectives is not due to a lack of awareness of the pressures. The significant pressures are well known. Agriculture, urban wastewater, hydromorphology, forestry, domestic wastewater, peat extraction, abstraction, and other land-use pressures continue to undermine water quality. The persistent gap lies in the failure to translate evidence into binding, targeted, funded and enforceable measures at the scale required to achieve the objectives of the Water Framework Directive.

The Fourth Water Action Plan must therefore be an implementation and enforcement plan. It must be science-based, identify all threats and impacts on water, clearly link those pressures

to specific measures, and set out the measures necessary to achieve WFD objectives for all water bodies. Where existing national initiatives are presented as solutions, their efficacy must be evaluated and published. Measures that have not demonstrably reduced pressures or improved water quality must be revised, strengthened or replaced.

Overarching position

The fourth cycle will be decisive. The final legal deadline for achieving Water Framework Directive objectives falls at the end of the third cycle, subject only to tightly justified exemptions. The next Water Action Plan cannot therefore be treated as a continuation of existing approaches. It must be an implementation, enforcement and recovery plan for Ireland's waters.

SWAN acknowledges that there have been governance improvements under the third Water Action Plan, including the establishment of the Programme Delivery Office, the publication of the first Sectoral Action Work Plans, the piloting of Catchment Management Work Plans and the piloting of Catchment Community Fora. These are welcome developments. However, they are not sufficient in themselves. The test of the fourth cycle is not whether Ireland has more plans, committees, dashboards or reporting structures. The test is whether those structures deliver measurable pressure reduction, legal compliance and ecological recovery at water body scale.

The Fourth Water Action Plan must therefore move decisively from activity tracking to enforceable delivery. This must include quantified commitments for each significant pressure at the catchment-level. Each commitment must identify:

- the affected water bodies,
- the pressure to be reduced,
- the scale of reduction required,
- the targeted measures to be put in place,
- the responsible public body or sector,
- the statutory, regulatory or funding mechanism for delivery
- the delivery deadline,
- the consequences of non-delivery.
- the monitoring indicator
- the public reporting mechanism and
- the escalation pathways where measures fail

Without these elements, the Plan risks becoming another cycle of activity reporting while ecological status continues to decline.

SWAN Key Asks Summary Table

Template issue	Subtitle	No.	Key Ask
Issue 1 – Governance	Independent mid-cycle review	1a	A full independent mid-cycle implementation review should be carried out by 2030, with the findings informing the remainder of the fourth cycle. This review must assess whether measures are reducing pressures and improving ecological status.
	Responsibility and enforcement matrix	1b	The Water Action Plan must clearly identify which public bodies are responsible for delivery, enforcement, funding and escalation for each significant pressure. Shared responsibility must not mean unclear responsibility.
	Programme Delivery Office	1c	The Programme Delivery Office should be strengthened as an accountability mechanism for WFD delivery. It must oversee effectiveness, delay, non-delivery and escalation, not only action completion.
	Transparency	1d	The minutes, summaries and progress reports of the main water governance structures should be made publicly available in a timely and accessible format. This should include updates on delivery, delays and unresolved implementation barriers.
	Undelivered commitments	1e	The Water Action Plan must include an annex of previously agreed but undelivered water-related commitments. This should identify the responsible body, reason for delay, revised deadline and implications for WFD compliance.
	Cross-border governance	1f	International river basin governance must be identified as a priority issue. The Water Action Plan should clearly set out the cross-border pressures, data-sharing needs and governance arrangements required for shared catchments.
Issue 2 – Policy Coherence	Dedicated/consolidated Water Act	2a	Government should commit to a legislative roadmap for a dedicated/consolidated Water Act. This is needed to rationalise fragmented water law, clarify public-body duties and embed WFD obligations across relevant sectors.
	Agriculture, nitrates and WFD	2b	Agricultural policy, nitrates policy and CAP supports must be aligned with WFD objectives. The Water Action Plan should clearly set out how catchment-specific nutrient and sediment reductions will be delivered. No derogation arrangement should be permitted where it is inconsistent with WFD non-deterioration or recovery objectives. This principle should be clearly stated in the Water Action Plan.

	Floods, drainage and hydromorphology	2c	Flood risk management, arterial drainage, land drainage and river maintenance must be brought into line with WFD objectives and nature-based catchment restoration. The Water Action Plan should further commit to an overhaul and planned phase out of the Arterial Drainage Acts and stronger controls on physical modification.
	Forestry	2d	Forestry policy should be assessed against water body risk, ecological sensitivity and cumulative catchment pressures before licences or supports are granted.
	Peatlands	2e	Illegal and unauthorised peat extraction should be treated as a significant water management issue requiring mapping, enforcement, monitoring and restoration.
	Urban wastewater	2f	Wastewater investment, planning decisions and policy must be aligned with receiving-water ecological objectives.
	Domestic wastewater	2g	A dedicated Domestic Wastewater Treatment Systems Sectoral Action Work Plan should be developed to coordinate inspection, grants, planning, public advice, enforcement and remediation.
	Transitional, coastal and aquaculture policy coherence	2h	Land-sea policy coherence must be strengthened in the Water Action Plan. This should include WFD-MSFD coordination, statutory Integrated Coastal Zone Management and WFD/MSFD-specific review of aquaculture licensing.
Issue 3 – Implementation	Measure sufficiency	3a	Each at-risk water body must have a measure sufficiency assessment. Where existing measures are not enough to achieve WFD objectives, the Plan must identify the additional supplementary measures required.
	Outcome-based CMWPs	3b	Catchment Management Work Plans for all 46 catchments should be published as outcome-based delivery plans. They must identify the pressures, measures and responsible bodies needed to achieve WFD objectives.
	Quantified Sectoral Action Work Plans (SAWPs)	3c	Sectoral Action Work Plans must show how each sector will reduce the number of water bodies for which it is a significant pressure. They should be measurable, time-bound and linked to WFD outcomes.
	Updated characterisation	3d	An updated national characterisation and pressure assessment should be published before the Fourth Water Action Plan is finalised. This must inform the measures selected for each water body.
	Dashboard and data sharing	3e	A public WFD delivery dashboard should track progress towards objectives, not only actions completed. Data-sharing barriers between public bodies must be resolved as part of WFD implementation.
	Resourcing and escalation	3f	Include a national WFD resourcing plan and mandatory escalation triggers where measures fail, delivery is delayed, or waters deteriorate.

Issue 4 – Public Participation	National awareness campaign	4a	A national public awareness campaign on water should be included in the Water Action Plan. It should explain the value of water, local pressures, WFD status and practical public action.
	Catchment Community Fora	4b	Catchment Community Fora should be established in all 46 catchments by 2027. They must have independent facilitation, access to relevant data and a formal role in Catchment Management Work Plans.
	Public-facing water body information	4c	Public-facing water body information should be provided for every water body. This should clearly show status, pressures, proposed measures, responsible bodies and reporting routes.
	Education and water literacy	4d	Water quality should be integrated into public education, political literacy and school curricula. The Water Action Plan should identify how this will be delivered.
	Citizen science and CMWP influence	4e	Citizen science and community monitoring should be supported and quality-assured. The Water Action Plan should set out how this evidence will inform catchment planning and decision-making through formal consideration of evidence in CMWPs.
Issue 5 – Ambition	Agriculture	5a	The Water Action Plan must include a catchment-centred agricultural measures programme. This must be legally linked to nutrient limits, critical source areas, derogation reform, enforcement and fair transition support.
	Hydromorphology	5b	A national hydromorphology restoration and compliance programme must be included in the Water Action Plan. It should address physical habitat, river continuity, flows, sediment and drainage impacts.
	Abstraction	5c	Abstraction management must be strengthened to protect ecological flows, groundwater and groundwater-dependent ecosystems. The Water Action Plan should review thresholds, cumulative abstraction and drought risk.
	Urban wastewater	5d	Move from infrastructure compliance to ecological recovery by prioritising wastewater investment by receiving-water risk, setting binding timelines, reviewing licences, improving nutrient/advanced treatment, addressing overflows and aligning recast UWWTD implementation with WFD objectives.
	Forestry	5e	Forestry measures must be based on catchment-wide assessment of cumulative impacts. Licence conditions should be site-specific, enforceable and capable of protecting high-status and sensitive waters.
	Peat extraction and peatland restoration	5f	Peatlands should be treated as water-quality and hydrological systems. The Water Action Plan must address active, legacy and unauthorised peat extraction and require restoration where waters are affected.

	High-status and protected waters	5g	Require enforceable sub-catchment protection plans for all high-status objective water bodies and sensitive protected areas, with early-warning monitoring, stricter activity assessment and no-deterioration safeguards.
	Transitional and coastal waters	5h	Transitional and coastal waters must be included as a dedicated programme in the Water Action Plan. This must identify land-based and non-land-based pressures and propose actions to address them.
	Aquaculture	5i	Aquaculture should be addressed within the transitional and coastal waters programme. Licensing, monitoring and enforcement must be reviewed for compatibility with WFD, MSFD and protected-area objectives.
Issue 6 – Further comments	Consultation process	6a	The Department should publish a summary of submissions and explain how the SWMI consultation will be carried forward into the draft Water Action Plan. The Department should explain how public input has influenced the Water Action Plan.
	Water as critical national infrastructure	6b	Water quality should be treated as critical national infrastructure. This framing should support stronger action for public health, biodiversity, climate resilience, food systems, recreation and local economies.
	Cycle of consequences	6c	The fourth cycle must be the cycle of consequences: failed measures strengthened, voluntary measures escalated, licences reviewed, enforcement resourced and continued decline addressed immediately.

Responses to Consultation Questions

Issue 1. Governance

Q1. Do governance and implementation structures need to be further enhanced and strengthened?

Yes. Governance and implementation structures must be strengthened because current arrangements have not delivered the outcomes required under the Water Framework Directive.

The third Water Action Plan¹ introduced important governance developments, including the Programme Delivery Office, Sectoral Action Work Plans², Catchment Management Work Plans and Catchment Community Fora pilots. SWAN welcomes these developments. These should be retained, resourced and improved. However, their existence cannot be treated as proof of effective governance. **The fourth cycle must now move from structural establishment to enforceable delivery.**

The key governance gap is that responsibility for actions has not yet translated into accountability for results. Assigning an action to a body is not sufficient. It remains unclear in many areas what happens if measures are delayed, under-resourced, insufficient, not enforced, or demonstrably failing to improve water quality. The Fourth Water Action Plan must specify what each body is required to deliver, by when, how success will be measured, how delivery will be funded, and what happens where the action is delayed, under-resourced, not enforced or ineffective.

EPA reporting for 2019–2024 shows that only 52% of surface waters are in good or high ecological status, meaning 48% remain in unsatisfactory condition³. EPA pressure assessment also shows that 1,649 water bodies, or 34% of all water bodies, are at risk of not meeting their environmental objectives because of human activities⁴. These figures demonstrate that governance arrangements must now be judged by environmental outcomes, not by the existence of structures.

Q2. If so, how can this be done?

The fourth cycle must focus on outcome-focused accountability, clear escalation mechanisms, public transparency and independent review.

¹ [Water Action Plan 2024](#) | Department of Housing, Local Government and Heritage. | Govt. of Ireland (2024)

² [Sectoral Action Work Plans](#) collection | Department of Housing, Local Government and Heritage | Govt. of Ireland (2025)

³ [Water Quality in Ireland 2019–2024](#) | EPA (2025)

⁴ [Update on Pressures Impacting on Water Quality](#) | EPA (2024)

The governance system could be strengthened in the below respects:

Independent mid-cycle implementation review

The Fourth Water Action Plan should include a full independent mid-cycle implementation review by 2030. This review should assess whether measures are reducing pressures and improving ecological status at water body and catchment scale, not merely whether actions have commenced. It should evaluate the effectiveness of SAWPs, CMWPs, enforcement, wastewater investment, agricultural measures, hydromorphological restoration, forestry controls, peatland measures and abstraction controls. Where measures are not working, the review should trigger mandatory corrective action. This may include mandatory measures, licence review, increased inspections, revised catchment targets, withdrawal of eligibility for damaging practices, revised funding priorities or statutory intervention.

Water Governance and Enforcement Responsibility Matrix

The Department should publish and maintain a public Water Governance and Enforcement Responsibility Matrix. This should identify the lead and supporting bodies responsible for monitoring, advice, licensing, enforcement, prosecution, remediation, funding, public engagement and escalation for each significant pressure. This is necessary because communities and stakeholders are often unclear whether responsibility lies with LAWPRO, local authorities, EPA, OPW, IFI, NPWS, DAFM, Uisce Éireann or another body. SWAN's members have specifically called for clarification of LAWPRO's role and which agencies are responsible for enforcement of water-related legislation and regulations.

Strengthened Programme Delivery Office

The Programme Delivery Office should oversee effectiveness, not only track activity. Its reports should distinguish between actions completed, actions delayed, actions not commenced, actions delivered but ineffective, and actions insufficient to meet WFD objectives. Where public bodies or sectors fail to deliver, this should be reported to WPAC, relevant Ministers and the public. Structured environmental NGO input, including SWAN input, should be built into delivery review so that implementation challenges are identified before they become end-of-cycle failures.

Transparent minutes, reporting and decision-trails

Minutes and accessible summaries of WPAC, NCMC, NTIG, Regional Committees and operational delivery structures should be published in a timely manner. Public reporting should explain not only what actions are being taken, but also whether those actions are sufficient, delayed, under-resourced or ineffective. SWAN's previous third-cycle submissions to the SWMI consultation⁵ and the water action plan consultation⁶ also called for greater publication of minutes, summaries and progress reports from governance structures.

⁵ [SWAN 3rd cycle SWMI public consultation submission](#) (2020)

⁶ [SWAN 3rd cycle WAP public consultation submission](#) (2022)

Annex of previously agreed but undelivered commitments

The Fourth Water Action Plan should include an annex of previously agreed but undelivered water-related commitments. This should identify the original commitment, responsible body, original deadline, current delivery status, reason for delay, revised deadline and implications for WFD compliance. Repeatedly carrying forward undelivered commitments without identifying delay or accountability is not acceptable in the fourth cycle. This is in line with the members' ask at the SWAN members' workshop that recommendations "agreed" by Government but not yet delivered should be included.

Cross-border governance

International river basin governance should be identified as a governance priority. Shared catchments require coordinated monitoring, pressure assessment, data sharing, enforcement, public participation and overarching governance. SWAN previously identified international cooperation as a priority for river basin management, and this remains relevant for the fourth cycle⁷⁸.

Q3. How can communication be improved on the roles and responsibilities of organisations involved in water management?

Ireland already has many of the components needed for effective water governance. EPA and Catchments.ie publish WFD status, risk, pressure and monitoring data; LAWPRO supports catchment coordination and community engagement; local authorities, EPA, IFI, Uisce Éireann and other agencies respond to different pollution and enforcement issues; EPA reports on local authority inspections, enforcement actions and prosecutions; and the Water Action Plan 2024 proposes Catchment Management Work Plans to drive local implementation.

However, these elements remain scattered, uneven and difficult to navigate. What Ireland lacks is not more institutional complexity, but a clear public accountability system: one place where people can see who is responsible for each water-quality pressure, who to contact when something goes wrong, what actions are planned or underway in their local water body, which bodies are advisory and which have enforcement powers, and whether inspections, notices, licence reviews or prosecutions are leading to measurable WFD improvements. In practice, Ireland has data, agencies and plans, but it does not yet have a transparent, waterbody-level system that links responsibility, action, enforcement and ecological outcome in one coherent framework.

Communication must therefore be improved by making governance legible to the public. This should go beyond the passive publication of plans, reports and datasets. Communities need to be able to understand who is responsible, what action is being taken, whether it is working, and how failures will be escalated where progress is not being delivered.

⁷ [SWAN 3rd cycle SWMI public consultation submission](#) (2020)

⁸ [SWAN 3rd cycle WAP public consultation submission](#) (2022)

Q4. Additional comments on governance

The governance system must be designed around delivery. The Fourth Water Action Plan cannot afford to use phrases such as “continue to work with stakeholders”, “support implementation” or “promote best practice” unless these are accompanied by specific identifiable measures, responsible bodies, deadlines, indicators and escalation pathways.

Additionally, the Fourth Water Action Plan must include an annex listing all water-related commitments previously agreed by Government but not delivered. This should identify the original commitment, responsible body, original deadline, current delivery status, reason for delay, revised deadline and implications for WFD compliance.

Repeatedly carrying forward undelivered commitments without identifying delay, failure or accountability is not acceptable in the fourth cycle.

Issue 2. Policy Coherence

Q1. Are there outstanding gaps preventing the coherence and integration of policy?

Yes. There is a continuing gap between policy alignment on paper and operational coherence in practice.

Many sectoral plans, public bodies and national strategies now refer to the Water Framework Directive, integrated catchment management, nature-based solutions, climate resilience or biodiversity recovery. This is welcome, but cross-referencing the WFD is not the same as delivering the measures necessary to achieve WFD objectives. The test of policy coherence is not whether policies mention one another. It is whether they collectively reduce pressures, prevent deterioration and restore ecological status at water body scale.

The outstanding gap is that many sectoral policies still operate according to their own objectives, funding cycles, consent systems and delivery timelines, without being consistently tested against WFD requirements. Agricultural policy, forestry licensing, flood risk management, wastewater investment, peatland management, land-use planning, drainage maintenance, abstraction control and biodiversity policy all affect water quality, but they are not yet integrated through a binding catchment-based framework that identifies cumulative pressures, assigns responsibility, prioritises measures and escalates action where water bodies are not improving.

This lack of operational coherence is evident in Ireland’s water-quality outcomes. Agriculture remains the most prevalent significant pressure, followed by hydromorphological pressures, forestry and urban wastewater⁹¹⁰.

The Fourth Water Action Plan must therefore move beyond general policy alignment and require enforceable operational coherence.

⁹ [Water Quality in Ireland 2019–2024](#) | EPA (2025)

¹⁰ [Update on Pressures Impacting on Water Quality](#) | EPA (2024)

Q2. Are there opportunities to strengthen the coherence and integration of policies?

Yes. The most important opportunity is to move beyond administrative coordination and commit to a dedicated/consolidated Water Act.

Dedicated/consolidated Water Act

Ireland's water law remains fragmented across multiple Acts, regulations, licensing regimes, public bodies and sectoral responsibilities. This weakens accountability, makes enforcement difficult, obscures public responsibilities and allows conflicting statutory mandates to persist. SWAN has previously¹¹ highlighted the need for consolidated primary legislation to address Ireland's fragmented water management framework. SWAN's research report on Physical Modifications¹² further calls for a dedicated Water Act consolidating and updating water-related legislation, reviewing the remits and WFD obligations of public bodies, and providing clearer governance and accountability.

A dedicated/consolidated Water Act should embed WFD non-deterioration, restoration and protected area duties across relevant public bodies; clarify institutional mandates; rationalise enforcement powers and licence review mechanisms; provide a coherent statutory basis for CMWPs, SAWPs and pressure-specific programmes; and clarify how public bodies must act when their functions affect water.

This legislative reform should not delay urgent action under existing law. However, without consolidated primary legislation, Ireland risks continuing to rely on fragmented governance structures to solve problems created by fragmented law.

Agriculture, nitrates policy and WFD objectives

Agricultural policy remains the most significant policy coherence failure in Irish water management. Agriculture is the dominant and most persistent pressure on water quality, impacting over 1,000 water bodies nationally¹³. Even as per the most recent EPA indicators report, nutrient pollution, particularly nitrogen in freely draining catchments and phosphorus and sediment in poorly draining catchments, continues to undermine rivers, lakes, groundwater, estuaries and coastal waters¹⁴.

The incoherence lies in the failure to align agricultural production policy, nitrates policy, CAP funding, derogation policy, farm advisory systems, enforcement and WFD objectives around the scale of pressure reduction required in specific catchments. SWAN calls for a catchment-centred, fair and outcome-driven model, with stronger targeting, enforcement, derogation reform and integration of catchment tools into regulatory and funding decisions¹⁵.

Ireland's agricultural water policy continues to rely heavily on broad national rules, voluntary advice and incremental measures, while water quality impacts are catchment-specific,

¹¹ [SWAN 3rd cycle SWMI public consultation submission](#) (2020)

¹² Physical modification and implications for meeting Ireland's WFD objectives, Research report | SWAN (2026) [In Press]

¹³ [Water Quality in Ireland 2019–2024](#) | EPA (2025)

¹⁴ [Water Quality in Ireland 2025](#) | EPA (2026)

¹⁵ Restoring Ireland's Water Quality | SWAN (2026) [In press]

pollutant-specific and pathway-specific. Nitrogen losses are most acute in freely draining soils, while phosphorus and sediment pressures are often associated with poorly draining soils, overland flow, farmyards, drainage pathways and hydrological connectivity. Critical source areas for nitrogen, phosphorus, sediment and ammonium may not overlap. A uniform national approach will therefore continue to misdirect resources and leave the highest-risk pathways under-addressed.

Derogation policy is a particularly acute example of incoherence. A nitrates derogation cannot be treated as a general agricultural entitlement where the same catchments are failing WFD waterbody objectives, deteriorating or requiring substantial nitrogen reductions. Derogation eligibility must be linked to independently verified water quality recovery, not merely administrative compliance.

The Fourth Water Action Plan should therefore align agricultural policy with catchment-specific nitrogen, phosphorus and sediment reduction requirements. Derogation arrangements should not be permitted where they are inconsistent with WFD non-deterioration or recovery objectives. The extension of Ireland's nitrates derogation from 1 January 2026 makes this coherence issue more urgent, not less¹⁶. (European Commission, 2025).

Flood management, arterial drainage and hydromorphology

A major policy coherence gap remains between flood management, arterial drainage, land drainage, river maintenance and the achievement of WFD objectives.

The incoherence is that one part of the State is tasked with restoring river ecology while other statutory functions can continue to maintain, drain, dredge, embank, culvert or physically simplify river systems. The Floods Directive, WFD, Nature Restoration Regulation, Habitats Directive and Birds Directive must be implemented coherently. At present, this coherence is not sufficiently secured.

SWAN recognises the importance of protecting communities from flooding. However, flood protection cannot be delivered in ways that undermine ecological recovery, increase downstream risk, disconnect floodplains or perpetuate channel maintenance regimes that damage habitat, sediment processes and river continuity.

The policy incoherence is particularly acute in relation to arterial drainage. The Arterial Drainage Acts reflect a previous era of river management and continue to embed an obligation to maintain drainage schemes. A review of arterial drainage requirements and the underpinning Arterial Drainage Act was committed to under Action 3.11 in the 3rd cycle Water Action Plan:

"Action 3.11: A review of arterial drainage requirements and the underpinning Arterial Drainage Act will be undertaken in order to inform future land use policy decisions arising out of the Land

¹⁶ Commission [press release](#) on extension of Ireland's nitrates derogation | European Commission (2025)

Use Review and to support the preparations for the implementation of the new Nature Restoration Law and the Heavily Modified Water Body review process.”

However, there has been no update on the progress so far. SWAN therefore reiterates the need for an overhaul of the Arterial Drainage Acts, WFD Article 4 assessment for relevant plans and projects, prior authorisation for hydromorphological alterations, and stronger integration across planning, flood risk, biodiversity and climate policy¹⁷.

Ireland cannot restore ecological status while continuing to physically simplify, drain, dredge and disconnect rivers and floodplains.

The Fourth Water Action Plan should require an overhaul and phase out of arterial drainage legislation, WFD-compliant assessment of flood and drainage works, prior authorisation for physical modifications, and presumption in favour of nature-based flood management where feasible.

Forestry, peatlands and land-use policy

Forestry and peatland policy must be better aligned with WFD objectives. Forestry can provide water, biodiversity and climate benefits where appropriately located and managed, but poorly planned forestry can contribute to sediment loss, nutrient mobilisation, acidification, hydrological alteration, drainage impacts, clear-felling pressures, road drainage impacts and deterioration of high-status and sensitive catchments. EPA identifies forestry as a significant pressure on 232 water bodies¹⁸. Peatland policy is too often treated primarily as climate or biodiversity policy. This is a serious policy coherence gap.

The Fourth Water Action Plan should require catchment-scale and WFD-specific assessment of forestry practices (afforestation, felling and replanting licenses), enforceable forestry licence conditions, replanting reform where WFD objectives are at risk, mapping and enforcement of illegal peat extraction, and integration of peatland restoration into CMWPs.

Urban wastewater, planning, climate resilience and WFD objectives

Urban wastewater policy has improved, but it remains insufficiently integrated with WFD ecological outcomes, land-use planning, population growth, climate resilience and receiving-water sensitivity.

The key policy incoherence is that wastewater planning is still too often driven by infrastructure programmes, population equivalent, asset condition or investment cycles, rather than by the ecological needs of receiving waters. The WFD requires protection and recovery of ecological status. The Urban Wastewater Treatment Directive (UWWTD) sets important collection and treatment obligations, but compliance with the UWWTD alone must not be assumed to secure WFD objectives.

¹⁷ Physical modification and implications for meeting Ireland’s WFD objectives, Research report | SWAN (2026) [In Press]

¹⁸ [Update on Pressures Impacting on Water Quality](#) | EPA (2024)

The Fourth Water Action Plan should explicitly link wastewater investment, discharge licensing, capacity planning, population growth, climate resilience and receiving-water objectives. Planning and housing policy must not assume that wastewater capacity will be provided later where water bodies are already failing or at risk.

Domestic wastewater, planning and rural development

Domestic wastewater treatment systems remain a significant pressure on water quality, yet policy responsibility remains fragmented across inspections, grants, planning, building control, public advice, household maintenance and local authority enforcement.

The Fourth Water Action Plan must include a dedicated Domestic Wastewater Treatment Systems Sectoral Action Work Plan. This should not be limited to the National Inspection Plan. The key ask is to integrate inspection, grants, planning, building control, advisory notice follow-up, public education, enforcement and remediation. EPA reported that 59% of septic tanks inspected in 2025 failed because they were not built or maintained properly, showing the need for a more coherent framework¹⁹.

Transitional, coastal and marine waters

Transitional and coastal waters remain among the poorest performing water body types with 70% in unsatisfactory condition²⁰. These waters are affected by cumulative upstream pressures, including nitrogen and phosphorus from agriculture, urban wastewater, domestic wastewater, industry, aquaculture, hydromorphological modification, port and harbour activity, dredging, coastal development, shipping, offshore energy and other marine activities.

The policy coherence gap is that transitional and coastal waters fall between multiple regimes^{21,22}: WFD, Marine Strategy Framework Directive, Maritime Spatial Planning, shellfish water protection, bathing water protection, Habitats and Birds Directives, aquaculture licensing, port development, wastewater regulation and catchment nutrient management. These are not yet sufficiently integrated into a single coherent implementation pathway.

The Fourth Water Action Plan should include a dedicated transitional and coastal waters programme, with nutrient vulnerability assessment, upstream load reduction targets, WFD-MSFD coordination, marine pressure assessment and targeted measures for shellfish, bathing and protected coastal waters.

This should include statutory Integrated Coastal Zone Management to provide a coherent land-sea governance framework for coastal development, aquaculture, ports, dredging, offshore energy, shellfish waters, bathing waters and protected coastal sites. Aquaculture licensing should also be reviewed specifically for compatibility with WFD, MSFD and protected-area objectives²³.

¹⁹ [Domestic Waste Water Treatment Systems Inspections 2025](#) | EPA (2026)

²⁰ [Water Quality in Ireland 2019–2024](#) | EPA (2025)

²¹ [Water Quality of Transitional and Coastal Waters: Policy Brief](#) | An Fóram Uisce (2026)

²² An Fóram Uisce Submission to the Public Consultation on SWMI (2026)

²³ [Aquaculture in Ireland: A Policy Briefing](#) | SWAN (2025)

Q3. How can better policy coherence be achieved?

Ireland's water law remains fragmented across multiple Acts, regulations, licensing regimes, public bodies and sectoral responsibilities. This fragmentation weakens accountability, makes enforcement difficult, obscures public responsibilities and allows conflicting statutory mandates to persist.

SWAN recommends:

1. A commitment to develop a consolidated Water Act to rationalise Ireland's fragmented water legislation and provide a coherent statutory basis for WFD implementation, enforcement and accountability.
2. A comprehensive mapping of water-related legal duties, institutional mandates, enforcement powers, licensing regimes and public body responsibilities.
3. An interdepartmental financing strategy for water, climate and nature restoration.
4. A requirement that all Sectoral Action Work Plans identify dependencies, conflicts, co-benefits and trade-offs with other sectoral plans.
5. Catchment Management Work Plans that identify cumulative pressures and the total scale of measures required, rather than listing sectoral actions in isolation.
6. A stronger role for the Programme Delivery Office in identifying policy conflicts and reporting them to WPAC and relevant Ministers.
7. A transparent trade-off framework, where economic or sectoral objectives are considered openly but cannot override WFD legal obligations without lawful and justified exemptions.
8. WFD-specific review of public expenditure programmes that may create water pressures, including flood schemes, forestry supports, agricultural supports, wastewater investment, drainage works and infrastructure development.

Q4. Additional comments on policy coherence

Policy coherence must include a clear distinction between policy alignment on paper and operational coherence in practice. The Fourth Water Action Plan must explicitly identify the policy areas that continue to create pressure on waters, including agricultural intensification, derogation policy, arterial drainage, forestry, peat extraction, wastewater infrastructure delays, land-use planning, abstraction and aquaculture. It must then identify the corrective measures required.

Without this honesty, policy coherence risks becoming a rhetorical commitment rather than a delivery mechanism.

Issue 3 – Implementation

Q1. Are there other barriers to implementation? What are they?

Yes. The principal implementation barrier is no longer a lack of awareness of the pressures affecting water quality. The principal barrier is the failure to translate knowledge of pressures into effective, targeted, enforceable and resourced measures at the scale required to achieve WFD objectives.

Ireland has no shortage of water-related plans, programmes, pilots, committees, advisory initiatives, dashboards or sectoral workstreams. The problem is that these have not collectively delivered the required recovery of water bodies. Nor has their collective efficacy in delivering WFD objectives been assessed, nor gaps identified. The Fourth Water Action Plan must therefore treat implementation failure as a significant water management issue in itself and it must be based on an evidence-based analysis of the extent to which current programmes are effective, or not, and contain specific measures to address the gaps.

Activity tracking is being mistaken for implementation

The third Water Action Plan introduced important delivery mechanisms, including the Programme Delivery Office, Sectoral Action Work Plans and Catchment Management Work Plans. These are welcome. **However, the fourth cycle must now ask a harder question: are these structures delivering measurable pressure reduction and ecological recovery?**

An Fóram Uisce's submission notes that the first iteration of CMWPs tracks actions at water body scale, but that the system must move from "activity tracker" to "targeting action". It recommends that measures should identify the issue being addressed, expected effectiveness, the scale of planned implementation, the scale required to achieve outcomes, predicted load reductions and expected timescales for achieving WFD objectives²⁴. SWAN supports this recommendation.

Measures are not yet being tested for efficacy

Existing measures are not consistently tested against the scale of recovery required. CMWPs and SAWPs should not simply collate existing actions. They must assess whether those actions are sufficient to achieve WFD objectives and identify additional supplementary measures where they are not.

For each at-risk water body, the Fourth Water Action Plan should require a measure sufficiency assessment identifying whether measures are sufficient, whether they are voluntary or mandatory, whether they are funded, whether they are enforceable and whether they are likely to achieve the required outcome within the relevant timeframe.

²⁴ An Foram Uisce (2026) Submission to the Public Consultation on SWMI

Enforcement remains too weak and uneven

Weak enforcement remains a central implementation barrier. Advisory and voluntary measures have a role, but they cannot substitute for compliance with legal obligations. EPA reporting on local authority agricultural inspections found a 37% non-compliance rate for initial GAP inspections in 2023²⁵, while EPA's 2024 National Agricultural Inspection Programme summary reported 2,598 initial GAP inspections and a 42% non-compliance rate²⁶.

Wastewater enforcement also demonstrates the need for stronger implementation. EPA reported that wastewater discharged from 59% of licensed treatment plants failed to consistently meet licence standards set to prevent pollution, and that treatment at 14 large urban areas failed EU standards in 2024²⁷.

Voluntary and advisory approaches are over-relied upon

Voluntary schemes and advisory programmes can support behaviour change, but they are not sufficient where water bodies are failing, deteriorating or at risk. The Fourth Water Action Plan should clearly distinguish between measures that are legally required, funded, voluntary, advisory, aspirational, necessary but unfunded, and necessary but not yet legally enabled.

Where WFD objectives are at risk, voluntary action should not be the only delivery route unless there is clear evidence that uptake, scale and effectiveness are sufficient. Where voluntary measures fail to deliver, mandatory measures must follow.

Data gaps and data-sharing delays are slowing implementation

The Water Forum's submission identifies delays in data sharing, particularly in relation to DAFM and OPW, as one of the most significant obstacles affecting implementation and progress of CMWPs. SWAN's members also echo this issue.

Data gaps must be resolved, but they should not become a reason for inaction where pressures are already known. CMWPs should identify data confidence, monitoring gaps, data-sharing barriers, the responsible body for resolving each gap, and the deadline for resolution.

Responsibilities remain fragmented across public bodies

Implementation is weakened where responsibilities are split across multiple bodies without a clear escalation pathway. Hydromorphology cuts across OPW, local authorities, EPA, IFI, NPWS, ESB, landowners and planning authorities. Agriculture cuts across DAFM, EPA, local authorities, Teagasc, LAWPRO, ASSAP and private advisors. Wastewater cuts across Uisce Éireann, EPA, DHLGH, CRU, planning authorities and local authorities.

Shared responsibility must not mean no responsibility. For every significant pressure, the Plan should identify the lead body, supporting bodies, enforcement body, funding body, reporting body and escalation body.

²⁵ [Local Authority Environmental Enforcement Performance Report 2023](#) | EPA (2024)

²⁶ [The National Agricultural Inspection Programme Summary Report 2024](#) | EPA (2025)

²⁷ [Urban Wastewater Treatment in 2024](#) | EPA (2025)

Implementation is under-resourced

The Fourth Water Action Plan will fail if ambition is not matched by people, skills and long-term funding. The Water Forum in their submission emphasises that implementation depends on workforce capacity, skills and stable funding across public bodies, utilities and local authorities, and warns that increased ambition without investment in people risks non-delivery. SWAN echoes their concern in this regard and recommends that it be addressed in the Fourth WAP.

Q2. Are there other initiatives that could support the scaling up of measures?

Yes. Scaling up requires enforceable delivery mechanisms, targeted funding, public transparency, technical assistance and escalation pathways.

Dedicated enforcement annex

The Fourth Water Action Plan should include a dedicated enforcement annex. This should set out inspection targets by pressure and sector, risk-based inspection criteria, follow-up requirements after non-compliance, licence review triggers, escalation routes from advisory bodies to enforcement bodies, sanctions for repeated or serious non-compliance, remediation requirements and public reporting of enforcement outcomes.

Outcomes-based CMWPs for all 46 catchments

CMWPs for all 46 catchments should be public, outcome-based delivery plans. For each water body they should show status, objective, risk, significant pressures, specific measures required, responsible bodies, whether measures are statutory or voluntary, scale planned, scale required, expected pollutant or hydromorphological improvement, funding source, enforcement pathway and escalation mechanism.

SAWPs with quantified reduction commitments

SAWPs should be retained and strengthened. The official objective of SAWPs is that each sector should, over time, no longer be a significant pressure on water status. In the fourth cycle this objective should be made measurable by requiring each SAWP to identify the number of water bodies affected by the sector, the expected reduction over the Plan period, the measures to deliver that reduction, the evidence for effectiveness and the enforcement or regulatory mechanisms available²⁸.

Updated national characterisation and pressure assessment

The Department should publish an updated Article 5 national characterisation and pressure assessment before finalising the Fourth Water Action Plan. This should identify, for each water body, current status, objective, risk, significant pressures, significant issues, confidence level,

²⁸ [Sectoral Action Work Plans](#) collection | Department of Housing, Local Government and Heritage | Govt. of Ireland (2025)

monitoring gaps, measures already in place, measures required, responsible bodies and whether the water body is on track.

Mandatory escalation triggers

The Fourth Water Action Plan should include mandatory escalation triggers. Escalation should be required where a water body deteriorates, remains at risk despite existing measures, shows no improving trend within the expected timeframe, suffers persistent non-compliance, has insufficient licence conditions, or experiences unresolved infrastructure delay.

WFD delivery dashboard

The Fourth Water Action Plan should include a public WFD delivery dashboard that tracks outcomes, not just actions. This should show status and risk, significant pressures, measures planned and delivered, measure sufficiency, confidence levels, data gaps, responsible bodies, enforcement actions, expected timelines and progress towards objectives.

National WFD resourcing plan

The Fourth Water Action Plan should include a national WFD resourcing plan identifying the staff, skills, long-term posts, technical capacity, inspection capacity, monitoring resources and funding required across key delivery bodies. Measures should not be included in the Plan unless the resources required to deliver them are identified.

Q3. Additional comments on implementation

The fourth cycle must be the cycle in which implementation becomes enforceable. Where measures fail, they must be strengthened. Where voluntary action is insufficient, mandatory measures must follow. Where licences are inadequate, they must be reviewed. Where enforcement is weak, it must be resourced. Where data are missing, monitoring must be improved. Where public bodies fail to deliver, that failure must be reported.

Implementation without efficacy, enforcement, funding and escalation is not implementation. It is delay.

Issue 4 – Public Participation

Q1. Is there a need for a national water quality campaign? What would the benefits be?

Yes. SWAN strongly recommends a Department-funded national water quality and water literacy campaign.

Water quality remains too often treated as a technical issue for agencies rather than a shared societal priority. Yet water underpins public health, biodiversity, climate resilience, farming, angling, recreation, tourism, drinking water, cultural identity and local economies.

The benefits of a national campaign would include:

- improved public understanding of local water bodies, catchments and WFD status;

- greater awareness of how everyday actions at home, on farms, in businesses and in communities affect water;
- improved reporting of pollution incidents, misconnections, illegal works and invasive species;
- increased uptake of practical measures such as septic tank maintenance, pesticide reduction, riparian protection, rainwater management and citizen science;
- stronger political support for investment and regulatory reform;
- greater trust where public bodies provide clear and accessible information.
- Serving as the basis for wider and more effective public participation, including better engagement with the draft Water Action Plan at national level and Catchment Management Work Plans at catchment/local level

Q2. What should a national water quality campaign look like?

In 2009, the then Department of Environment, Heritage and Local Government commissioned SWAN to develop a blueprint for a public awareness campaign on water. This was a comprehensive document, developed over a period of 4 months. While it may be out of date now in terms of governance structures and in particular the use of social media, it is still relevant and is available to answer this **question. Please contact us if you need us to re-submit a copy.**

Local water body information

The campaign must be locally grounded. It should explain WFD status, ecological status, chemical status, protected areas, pressures and measures using plain English and water body-level information.

QR-linked signage and accessible data

Public-facing information should include QR-linked water body information at key locations such as bathing waters, riverside walks, angling points and community spaces. This was a recommendation that was raised at the SWAN workshop where members' suggested that signage should be linked to EPA data and be formalised as a national public information measure.

Health, climate and nature framing

The campaign must link water quality to public health, bathing water, drinking water source protection, private wells, shellfish waters, biodiversity, fish kills, flooding, drought and climate resilience.

Education and water literacy

Water quality should be integrated into education and public literacy programmes. The members' workshop specifically identified the need for education on water quality for the

public and politicians, and for the Department of Education to identify where water is addressed in the curriculum.

Community action and citizen science

The campaign should support citizen science, community monitoring and local evidence gathering, with clear routes for data to be quality-assured and considered in catchment planning.

Q3. Are there other opportunities to encourage greater public participation?

All 46 Catchment Community Fora by 2027

Catchment Community Fora should be established across all 46 catchments by 2027, with independent facilitation, modest operating budgets, access to data and formal routes into CMWPs. LAWPRO has already been tasked through Water Action Plan 2024 with designing a national model for CCFs, and five pilot catchments have been used²⁹. The fourth cycle should now move to full rollout.

Formal influence on CMWPs

CCFs must have a meaningful route into CMWP development and in fact participation in the development of the CMWPs and in decisions around management of their waters, should be a key role of the CCF. Communities should not be asked merely to endorse plans after key decisions have been made. They should have access to evidence, support to understand trade-offs, be involved in management decisions and be provided with feedback on how their input has influenced measures.

Citizens' Assembly on Water

Government should consider a Citizens' Assembly on Water. This should be retained as a secondary public participation ask, not a substitute for implementation and enforcement. Water quality decisions involve trade-offs around land use, food systems, wastewater investment, flood management, drinking water, ecological restoration and the rights of future generations.

Q4. What are the current barriers to the public accessing information?

Barriers include technical language, dispersed data portals, uncertainty about roles and responsibilities, lack of real-time or locally relevant information, limited visibility of enforcement outcomes, difficulty interpreting WFD status, and lack of accessible explanations of what is being done in each water body.

Public trust can also be weakened where communities report issues but cannot see what action followed, or indeed where action does not follow, as has not infrequently been the experience of SWAN members

²⁹ Catchment Community Fora | LAWPRO (2026)

SWAN recommends:

- a single public-facing water body page for each water body, showing status, pressures, planned measures, responsible bodies, monitoring data, local forum information and reporting routes;
- plain-language summaries of technical assessments and confidence levels;
- public dashboards showing implementation and effectiveness, not only activity;
- publication of enforcement and inspection statistics in accessible form;
- clear communication of pollution alerts, bathing water warnings, sewage overflows and fish kill investigations;
- greater integration of citizen science data where quality is assured through training programmes.

Q5. Additional comments on public participation

Public participation must be meaningful, not symbolic. Communities should not be asked merely to endorse plans after key decisions have been made. They should be engaged early in decision-making, provided with accessible evidence, supported to understand trade-offs, and given feedback on how their input affects measures.

Stakeholders who make submissions should receive a considered response explaining where their input has been incorporated into the Water Action Plan and, where it has not, why not. (SWAN, 2020; SWAN, 2026a).

Issue 5 – Ambition – Meeting Water Framework Directive targets

Q1. Considering current programmes and initiatives, are there other opportunities to accelerate the restoration and protection of water bodies?

Yes. The Fourth Water Action Plan must be substantially more ambitious than the third cycle because Ireland remains off track and because the legal deadline for achieving WFD objectives, subject only to tightly justified exemptions, falls at the end of the current cycle.

Ambition cannot be measured by the number of strategies, pilots, advisory initiatives, committees, dashboards or sectoral plans in place. Ambition must be measured by whether the Plan sets out the measures necessary to restore and protect water bodies in line with WFD objectives.

EPA reporting for 2019–2024 shows that only 52% of surface waters are in good or high ecological status, meaning 48% remain in unsatisfactory condition. EPA pressure assessments show that 1,649 water bodies, or 34% of all water bodies, are at risk of not meeting their environmental objectives because of human activities. Agriculture is the most significant pressure, followed by hydromorphology, forestry and urban wastewater.

The following pressure-specific asks should be treated as priority commitments for the fourth cycle.

Agriculture: catchment-centred, enforceable and outcome-driven reform

Agriculture must be treated as the central test of ambition in the Fourth Water Action Plan. EPA pressure assessment identifies agriculture as the most significant pressure on water quality, impacting over 1,000 water bodies nationally. Nutrient pollution, particularly nitrogen in freely draining catchments and phosphorus and sediment in poorly draining catchments, continues to undermine rivers, lakes, groundwater, estuaries and coastal waters. EPA's 2024 nitrogen and phosphorus assessment found that 38% of river monitoring stations had nitrate concentrations above 8 mg/l NO₃, the level at which ecological impacts may occur³⁰

SWAN's research report on agriculture³¹ argues that Ireland must shift from broad, largely uniform and voluntary measures to a legally enforceable, catchment-specific framework. It calls for binding nutrient load caps, legally operative CSA/PIP/FLAG targeting, stronger enforcement, a fair transition away from derogation dependency, and tighter controls on digestate, pesticides, organic manures and contractor spreading.

The Fourth Water Action Plan should consolidate the agriculture asks into three priority commitments.

Legally binding catchment nutrient limits and risk-tiered CSA/PIP/FLAG targeting

The Plan should require legally binding nutrient load caps at catchment level, directly linked to WFD objectives and relevant thresholds for dissolved inorganic nitrogen, phosphorus, sediment and ecological response. These caps should define the maximum nutrient load a catchment can assimilate without ecological deterioration and should provide the benchmark for regulation, compliance, funding and enforcement³⁰³¹.

Critical Source Area, Pollution Impact Potential and FLAG mapping should be made legally operative. These tools should be embedded in River Basin Management Plans, Catchment Management Work Plans, the Nitrates Action Programme, CAP conditionality, ACRES, Farming for Water, derogation eligibility, advisory services, inspection prioritisation and enforcement. Rules should be risk-tiered according to soil type, hydrology, slope, drainage class, hydrological connectivity, proximity to watercourses and mapped nutrient/sediment delivery pathways. High-risk land should face stricter requirements, including lower nitrogen limits, tighter stocking controls, longer or weather-triggered closed periods, variable-width buffers, runoff interception from yards and roadways, enhanced slurry storage, restrictions on autumn grazing, and tighter controls on spreading in sensitive weather or soil-moisture conditions³¹³²

The purpose is not to apply more rules everywhere. The purpose is to ensure that the strictest rules apply where pollution risk is highest and where measures will deliver the greatest water-quality benefit.

Derogation reform and a fair catchment transition pathway

SWAN recommends a decisive, science-based and fair transition away from derogation dependency, delivered within a catchment-centred framework that ties reductions to

³⁰ [Water Quality: Nitrogen and Phosphorus in Irish Rivers 2024](#) | EPA (2025)

³¹ Restoring Ireland's Water Quality | SWAN (2026) [In press]

³² [Evidence-based Targeting of Agricultural Measures to Improve Water Quality](#) | EPA (2025)

ecological capacity and provides a just transition for farmers. The agriculture report argues that derogation is no longer tenable where water bodies are failing, deteriorating or requiring substantial nutrient reductions³³.

Given the subsequent extension of Ireland's nitrates derogation from 1 January 2026³⁴, the Fourth Water Action Plan should state clearly that derogation arrangements must not be permitted where they are inconsistent with WFD non-deterioration or recovery objectives. Eligibility for higher stocking rates should be linked to independently verified water-quality recovery, not simply administrative compliance³⁵.

No new or renewed derogation permissions should be granted in catchments where water bodies are failing, deteriorating, or requiring significant nitrogen or phosphorus reductions unless it can be demonstrated that WFD objectives will not be compromised. In higher-risk catchments, stocking-rate reductions should be accelerated. In lower-risk catchments, any transition should still be time-bound and linked to ecological indicators.

This must be accompanied by a Catchment Transition Fund. Supports should include payments for ecosystem services, land retirement where appropriate, wetland and riparian woodland creation, farmyard and slurry-storage upgrades, integrated constructed wetlands, low-interest loans, tax supports, advisory scale-up and diversification supports for lower-input systems³³.

Stronger enforcement, traceability and control of emerging agricultural risks

The Plan must make agricultural enforcement a core WFD delivery mechanism. EPA reported a 37% non-compliance rate for initial GAP inspections in 2023 and a 42% non-compliance rate in 2024, while SWAN's agriculture report identifies weak enforcement, patchy inspection coverage, reliance on soft enforcement tools and poor linkage between water-quality outcomes and regulatory responses as major barriers.

The Plan should commit to the setting of statutory minimum inspection levels for each county, scaled to water-quality risk, with inspections targeted to high-risk catchments identified through PIP maps, CSAs and LAWPRO assessments. Annual county-level scorecards should report inspections, non-compliance, follow-up, sanctions, remediation and water-quality outcomes. PIP and CSA mapping should be mandatory in enforcement, and high-risk zones should be subject to stricter buffers, storage obligations, runoff interception and verification that measures are installed on mapped delivery or breakthrough pathways and remain functional after rainfall.

The Plan should also address emerging and under-regulated agricultural pollution risks, including digestate from anaerobic digestion, pesticide peaks, organic manure transfers and slurry spreading by contractors.

The National Fertiliser Database should be expanded to capture organic manures, slurry, poultry litter and digestate. Digital, GPS-logged records should be required for fertiliser, slurry

³³ Restoring Ireland's Water Quality | SWAN (2026) [In press]

³⁴ Commission [press release](#) on extension of Ireland's nitrates derogation | European Commission (2025)

³⁵ [Case C-461/13](#) Bund für Umwelt und Naturschutz Deutschland eV v Bundesrepublik Deutschland (Weser), judgment of 1 July 2015 | Court of Justice of the European Union (2015)

and digestate applications, including contractor operations. Contractors spreading fertiliser, slurry or digestate should be licensed and subject to audit, inspection and enforcement. CAP conditionality should be used as an enforcement lever, with verified water-related breaches triggering in-year payment adjustments, enhanced penalties for repeat breaches, scheme exclusion where appropriate, prosecution for serious offences and restoration requirements where damage has occurred³⁶.

Advisory programmes should support, but not replace, enforcement. ASSAP, Farming for Water, ACRES and NAP/GAP training should be aligned around CSA-targeted action, verified delivery and follow-up. A shared advisory and enforcement data system should record visits, agreed actions, evidence of completion and catchment-level outcomes.

Hydromorphology: restore physical habitat, flow, sediment and river continuity

Ireland cannot restore ecological status by addressing nutrients alone while allowing rivers, lakes, wetlands and floodplains to remain physically simplified, drained, dredged, disconnected or over-maintained. Hydromorphological pressures affect river continuity, habitat, flow regime, sediment transport, riparian condition, floodplain connection and ecological resilience. These pressures can prevent recovery even where chemical pressures are reduced.

Hydromorphology must be treated as a central WFD delivery issue, not a secondary restoration theme. The Water Action Plan 2024 identifies hydromorphological pressures affecting 448 at-risk water bodies, while EPA's public pressure summary identifies physical habitat pressures affecting 453 water bodies³⁷³⁸.

SWAN's research on Hydromorphology³⁹ calls for hydromorphological assessment across the full five-class WFD status gradient; transparent and independently validated methods; accelerated barrier assessment and removal; case-by-case environmental flow assessment for larger barriers; and review of abstraction thresholds and licence duration.

The Fourth Water Action Plan must require the following priority hydromorphology commitments.

Full-gradient assessment and transparent methods

Hydromorphological assessment must be developed and implemented across all five WFD ecological status classes, from high to bad, and across all relevant water body types. Assessment methods such as RHAT, MQI, MImAS and HQI should be fully described, publicly available and independently validated.

³⁶ Restoring Ireland's Water Quality | SWAN (2026) [In press]

³⁷ [Water Action Plan 2024](#) | Department of Housing, Local Government and Heritage. | Govt. of Ireland (2024)

³⁸ [Water Quality in Ireland 2019–2024](#) | EPA (2025)

³⁹ Physical modification and implications for meeting Ireland's WFD objectives, Research report | SWAN (2026) [In Press]

Abstraction

Abstraction management must be strengthened in light of climate change, drought risk and ecological flow requirements. Ireland now has an abstraction registration and licensing framework, but the Fourth Water Action Plan must test whether it is sufficient to protect WFD objectives. The EPA states that the registration threshold is 25 m³ or more in any 24-hour period, while abstractions between 25 m³/day and 1,999 m³/day require registration and EPA assessment to determine if a licence is required. EPA guidance also states that approximately 20% of abstractions on the register exceed the 2,000 m³/day licensing threshold⁴⁰.

Ireland's registration and licensing thresholds are high compared with neighbouring jurisdictions and calls for review of registration thresholds, licence duration and the evidence base for regulation.

Drainage maintenance and physical modification controls

Drainage maintenance, channel maintenance and physical modification controls should be brought within the hydromorphology delivery programme. Where arterial drainage, flood relief, land drainage or maintenance works may affect WFD objectives, they should be subject to WFD-compliant assessment, authorisation, review and mitigation. The decision to designate arterially drained rivers as heavily modified should be reversed in the fourth WAP.

Barrier removal, environmental flows and sediment management

The Plan must accelerate the inventory, prioritisation and removal of small barriers, supported by ecological assessment and post-removal habitat rehabilitation. For larger barriers and impoundments, environmental flow requirements must be assessed case by case and made enforceable where needed. Sediment budgeting and catchment-scale sediment management should be integrated into RBMPs and CMWPs.

Nature-based flood management and floodplain restoration

Flood risk management should presumptively favour nature-based solutions, floodplain reconnection, wetland restoration, riparian restoration and multifunctional floodplain management. Where such approaches are ruled out, the responsible authority should be required to justify why they cannot be delivered. This is also consistent with the EU Nature Restoration Regulation's freshwater restoration direction, including the EU-level objective to restore at least 25,000 km of rivers to a free-flowing state by 2030⁴¹.

Hydromorphology is a structural condition for ecological recovery. The Fourth Water Action Plan must make it enforceable.

Urban wastewater: move from infrastructure compliance to ecological recovery

Urban wastewater remains a significant pressure on rivers, lakes, estuaries and coastal waters. EPA pressure assessment identifies urban wastewater as a significant pressure on 214 water

⁴⁰ [Principles of Water Abstractions and Associated Impoundments Authorisation](#) | EPA (2025)

⁴¹ [Nature Restoration Regulation](#): river connectivity and restoration of at least 25,000 km of rivers to a free-flowing state by 2030 | European Commission (2024)

bodies in the latest public pressure summary, while the Water Action Plan 2024 Executive Summary identifies urban wastewater as a pressure on 197 at-risk water bodies.

Ireland has made substantial progress in reducing untreated wastewater since the 1990s, but continued non-compliance, operational failures, nutrient pressures, storm overflows and delayed upgrades remain incompatible with WFD recovery. EPA's Urban Wastewater Treatment (UWWT) in 2024 report identifies 14 large urban areas where treatment failed EU standards. EPA also reported that wastewater discharges from 59% of licensed treatment plants failed to consistently meet licence standards set to prevent pollution.

The Fourth Water Action Plan must explicitly recognise that compliance with the Urban Waste Water Treatment Directive (UWWTD) does not automatically secure WFD ecological objectives. The UWWTD is primarily infrastructure- and treatment-standard based; the WFD is ecological-outcome based. A wastewater plant can meet minimum treatment requirements and still contribute to ecological failure in a sensitive or overloaded receiving water. SWAN's research on UWWT identifies a structural misalignment between infrastructure provision, regulatory enforcement and the ecological objectives of the WFD⁴².

The Fourth Water Action Plan must require the following five priority urban wastewater commitments.

Receiving-water-based investment prioritisation

Wastewater investment must be prioritised according to ecological risk, protected area sensitivity, public health risk, climate resilience and future population growth, not only population equivalent, asset condition or capital delivery convenience.

Binding timelines for raw sewage, priority areas and delayed projects

The Plan must include binding timelines for ending raw sewage discharges, addressing EPA priority areas and resolving long-delayed infrastructure deficits. Where full infrastructure delivery will not occur within the Plan period, interim measures must be identified and funded.

Licence review where waters are failing, at risk or deteriorating

Wastewater discharge authorisations must be reviewed where receiving waters are failing, at risk, deteriorating or subject to protected area objectives. Licence limits must be tightened where necessary to achieve WFD objectives, including in nutrient-sensitive rivers, lakes, estuaries, shellfish waters, bathing waters and freshwater pearl mussel catchments.

Nutrient removal, advanced treatment and recast UWWTD implementation

The Plan must identify where secondary treatment is insufficient and where enhanced nutrient removal, tertiary treatment, quaternary treatment or advanced treatment technologies are required. SWAN's research on UWWT notes that secondary treatment was designed to address organic pollution rather than eutrophication or chemical status, and that tertiary or advanced processes are needed where nitrogen, phosphorus, pathogens or micropollutants are relevant to receiving-water sensitivity.

⁴² Urban Wastewater Treatment in Ireland and Implications for Meeting the Water Framework Directive and the Urban Waste Water Treatment Directive | SWAN (2026) [In Press]

Implementation of the recast UWWTD must be explicitly aligned with WFD objectives, including nutrient removal, micropollutant control, extended producer responsibility, energy performance, monitoring and transparency. The revised UWWTD entered into force on 1 January 2025 and expands the EU approach to wastewater collection and treatment, including micropollutants and energy neutrality⁴³.

Storm overflows, misconnections and climate resilience

Combined sewer overflows, stormwater overflows, misconnections, stormwater infiltration and hydraulic overload must be treated as core wastewater pressures. SWAN's UWWT research identifies CSOs/SWOs as a regulatory blind spot because compliance is often assessed under "normal operating conditions", while increasingly frequent heavy rainfall events can trigger untreated mixed discharges and short-term pollution spikes.

Their frequency, volume and ecological impact should be publicly reported and reduced through a targeted national programme. Climate resilience assessments should be required for wastewater networks and treatment plants, including extreme rainfall, flooding, drought, sea-level rise and future hydraulic loading.

Wastewater planning must be governed by the ecological sensitivity and objective of the receiving water, not by minimum infrastructure compliance.

Forestry: enforce water-sensitive forestry at catchment scale

Forestry must be treated as a significant water management issue requiring enforceable controls, not merely guidance. EPA pressure assessment identifies forestry as one of the main significant pressures after agriculture and hydromorphology. EPA's latest public pressure summary identifies forestry as a significant pressure on 232 water bodies, while the Water Action Plan 2024 identifies forestry as a significant pressure on 216 at-risk water bodies.

Forestry can provide water, biodiversity and climate benefits when appropriately located and managed. However, poorly planned or poorly regulated forestry can cause sediment loss, nutrient mobilisation, acidification, hydrological alteration, drainage impacts, clearfell pressures, road drainage impacts and deterioration of high-status and sensitive catchments. EPA HYDROFOR research identified water-quality and ecological risks from forestry operations, supporting the need for stronger water-sensitive forestry controls. The recommendations of the HYDROFOR study should be incorporated in updated best practice guidelines and forest policy, and all afforestation in acid sensitive peat soils should cease⁴⁴.

The Fourth Water Action Plan must require the following five priority forestry commitments.

Catchment-scale forestry pressure assessment

Afforestation, felling, replanting, forest roads and drainage should be assessed cumulatively at catchment scale, particularly in high-status, pearl mussel, salmonid, upland and peat catchments.

⁴³ [Urban Wastewater: Revised Urban Wastewater Treatment Directive](#) | European Commission (2025)

⁴⁴ EPA Research Report 169: [HYDROFOR](#): Assessment of the Impacts of Forest Operations on the Ecological Quality of Water | Kelly-Quinn et al., (2016)

WFD-specific licensing and licence review

Forestry licences should be assessed against WFD objectives. Existing authorisations should be reviewed where forestry is a significant pressure, where water bodies are failing or at risk, or where protected area objectives are not being met.

Enforceable water protection conditions

Forestry licences must include enforceable water protection conditions, including riparian buffers, sediment controls, drainage standards, road design requirements, harvesting controls and post-licence compliance monitoring.

Replanting reform where WFD objectives are at risk

Mandatory replanting requirements should be removed or modified where replanting would undermine WFD objectives, high-status water protection, peatland restoration or protected area objectives.

Prioritise restoration and native woodland where it supports WFD outcomes

Native woodland, riparian woodland and woodland-to-bog or woodland-to-wetland restoration should be prioritised where it supports WFD, biodiversity, climate and flood resilience objectives.

Forestry policy must be judged by water quality outcomes, not by the existence of environmental guidance.

Peat extraction and peatland restoration: treat peatlands as water infrastructure

Illegal and unauthorised peat extraction must be identified as a significant water management issue. Peatlands are not only climate and biodiversity assets. They are hydrological systems and water quality assets. Healthy peatlands regulate flows, store water, retain carbon and sustain biodiversity. Degraded peatlands can release sediment, dissolved organic carbon, nutrients and ammonia, alter hydrological regimes and damage downstream habitats.

EPA reporting identifies drained peat as a significant pressure on 106 at-risk water bodies, down from 116 in the previous assessment, but still affecting just over 6% of water bodies at risk of not meeting objectives. EPA research also identifies peatland drainage and extraction as causing downstream impacts on aquatic life, including habitat alteration and reduced ecological quality⁴⁵.

In December 2025, the Irish Peatland Conservation Council (IPCC) made a statement at the Oireachtas to the Joint Committee on Climate, Environment and Energy on illegal peat extraction. Following this, the Committee published a list of recommendations in February this year (34/CEE/08)⁴⁶. The Fourth action plan must ensure that the actions set out within these be enacted. In addition, the plan must also commit to the following priorities to protect our waters from the water quality risks associated with peatland drainage. .

⁴⁵ EPA Research Report 489: [Strategies to Improve Water Quality from Managed Peatlands \(SWAMP\)](#) | Renou-Wilson et al., (2025)

⁴⁶ [Recommendations regarding Illegal Peat Extraction](#) | Joint Committee on Climate, Environment and Energy (2026)

Clear enforcement responsibility

The Plan must clarify the body responsible for enforcement against illegal and unauthorised extraction and how referral, investigation, sanction and remediation will operate. The Committee on Climate Environment and Energy recommends that “...the EPA be made the responsible body for all enforcement activities relating to illegal peat extraction and given the appropriate powers and resources to pursue offenders.”

Mapping of active, legacy and unauthorised peat extraction sites

The Plan must map active, legacy and unauthorised peat extraction sites affecting water bodies and identify affected protected areas, drinking water sources and downstream habitats.

Water quality and hydrological monitoring

The Plan must require upstream and downstream monitoring of sediment, dissolved organic carbon, ammonia, nutrients, hydrological alteration and ecological effects where peat extraction, drainage or degraded peatlands affect water bodies.

Restoration and remediation requirements

Where peat extraction or drainage has damaged waters, restoration or remediation requirements should apply. This should include restoration orders where appropriate and public reporting on progress.

Integration of peatland restoration into CMWPs

Peatland restoration should be integrated into Catchment Management Work Plans where it contributes to water quality, hydrological restoration, biodiversity recovery and climate resilience.

Peatland restoration must be recognised as a water measure, not only a climate or biodiversity measure.

High-status waters and protected areas: protect before decline occurs

High-status waters require the strongest protection in the Fourth Water Action Plan. Preventing deterioration is cheaper, more effective and legally necessary. Once high-status waters decline, restoration is slower, more expensive and often uncertain.

The decline of high-status waters is one of the clearest indicators that Ireland’s water governance system has failed to protect its best waters. LAWPRO’s Blue Dot programme reports that the percentage of river sites nationally achieving high status fell from 31.6% in 1987–1990 to 17.7% in 2020–2023 and identifies 402 Blue Dot water bodies nationally⁴⁷.

Existing initiatives such as the Blue Dot programme are welcome, but they must be supported by enforceable protection measures.

This ask is retained from SWAN’s previous third-cycle submission, given the continuing decline of high-status waters and the need to ensure that the Blue Dot Programme is supported by

⁴⁷ [Blue Dot Catchments Programme](#) | LAWPRO (2026)

enforceable sub-catchment protection measures⁴⁸. The Fourth Water Action Plan must require the following five priority high-status and protected area commitments.

High-status sub-catchment protection plans

All high-status objective water bodies should have dedicated sub-catchment protection plans. These should identify pressures, sensitive pathways, prohibited or restricted activities, early-warning indicators, responsible bodies and escalation measures.

Stricter assessment of damaging activities

Forestry, drainage, agricultural intensification, abstraction, development, road works and physical modifications should be subject to stricter assessment in high-status catchments.

Early-warning monitoring and automatic intervention

Early-warning monitoring should trigger immediate action where decline is detected. The Plan should not wait until high-status waters fall to good or moderate status before intervention.

No deterioration safeguards

Activities likely to cause deterioration should be prohibited or restricted unless WFD-compliant authorisation is in place. The Plan should make clear that high-status waters require prevention-first protection.

Protected area integration

Protected areas, including SACs, shellfish waters, bathing waters, drinking water protected areas, salmonid waters and freshwater pearl mussel catchments, should receive tailored measures that reflect their legal and ecological sensitivity.

Protection of the best waters must be preventative, not reactive.

Transitional, coastal and marine waters: address the worst-performing waters directly

Transitional and coastal waters require a dedicated programme of measures in the Fourth Water Action Plan. They should not be treated simply as downstream receiving waters for inland measures, nor should they fall between the WFD, Marine Strategy Framework Directive, Maritime Spatial Planning, shellfish water protection, bathing water protection, aquaculture licensing and coastal development regimes.

EPA's 2019–2024 assessment shows that only 30% of transitional waters and 83% of coastal waters achieved good or better ecological status. Transitional waters are therefore among the poorest-performing water body types nationally. The Water Forum/AQUAFACt policy analysis also emphasises that estuarine and coastal systems are vulnerable receiving waters for upstream pressures and that their ecological response depends on residence time, light availability, flushing and nutrient sensitivity

SWAN's previous third-cycle submission called for coastal matters to be included as an overarching significant water management issue, with a dedicated section identifying non-

⁴⁸ [Management strategies for the protection of high-status water bodies](#) | EPA | Ní Chatháin, et al., (2012)

land-based pressures contributing to poor ecological status, including aquaculture, fishing, shipping, offshore renewable energy, coastal development, marine litter and seaweed harvesting

The Fourth Water Action Plan should consolidate the transitional, coastal and aquaculture asks into five priority commitments.

Dedicated transitional and coastal waters programme

The Fourth Water Action Plan must include a dedicated transitional and coastal waters programme. This should identify, for each relevant water body, its status, objective, significant pressures, upstream and marine contributors, measures required, responsible bodies, timelines and ecological response indicators. The programme should not be limited to upstream nutrient measures. It should also assess non-land-based pressures where relevant, including aquaculture, ports, dredging, fishing, shipping, coastal development, offshore renewable energy infrastructure and marine litter pathways.

Nutrient vulnerability and upstream load reductions

The EPA should develop a national vulnerability index for nutrient enrichment and eutrophication in transitional and coastal waters. CMWPs in catchments draining to transitional or coastal waters should explicitly consider both upstream nutrient loads and the expected ecological response in receiving estuaries and coastal waters. In catchments where nitrogen or phosphorus reductions are required to protect estuarine or coastal waters, the CMWP should identify the required load reduction, responsible sectors, measure sufficiency, timeframe and monitoring indicators.

Stronger WFD–MSFD governance and implementation

The Fourth Water Action Plan should establish a stronger governance mechanism for coordinated WFD and MSFD implementation. This could include a joint steering group, expansion of the relevant WPAC remit, or a combined implementation plan for transitional and coastal waters. The purpose should be to ensure that measures under the WFD, MSFD, Maritime Spatial Planning, shellfish water protection, bathing water protection, Habitats and Birds Directives, aquaculture licensing and wastewater regulation are mutually reinforcing rather than fragmented.

Statutory Integrated Coastal Zone Management Strategy

The Fourth Water Action Plan should commit to a statutory Integrated Coastal Zone Management Strategy to bridge the gap between land-sea governance. This should address the cumulative effects of upstream nutrient loading, wastewater discharges, coastal development, dredging, aquaculture, ports, shipping, offshore renewable energy, habitat loss and climate change, and should clarify institutional responsibilities at the interface of catchment management, coastal planning and marine governance.

Aquaculture licensing, monitoring and enforcement

Aquaculture should be explicitly addressed within the transitional and coastal waters programme. SWAN's aquaculture policy briefing identifies aquaculture as directly relevant to both WFD and MSFD delivery, particularly where finfish or shellfish farming affects water

quality, benthic habitats, wild salmonids, invasive species, marine litter, eutrophication, seafloor integrity, Natura 2000 sites or coastal ecosystem functioning (SWAN, 2025b).

The Plan should require a WFD- and MSFD-specific review of aquaculture licensing. Existing and future aquaculture licences should be independently assessed to determine whether they are compatible with WFD non-deterioration, WFD ecological and chemical status objectives, MSFD Good Environmental Status, protected-area objectives and cumulative pressure limits. No licence should be granted, renewed or continued where it cannot be demonstrated that the activity will not compromise the objectives of the WFD, MSFD or Habitats and Birds Directives and forthcoming Nature Restoration Plan.

The review should include cumulative impact assessment at bay, estuary and coastal water-body scale. It should assess organic enrichment, nutrient release, dissolved oxygen effects, benthic smothering, medicines and pesticides, disease and parasite transfer, escaped farmed fish, impacts on wild salmonids, shellfish bio deposition, dredging for mussel spat, impacts on seagrass and reef habitats, and interaction with wastewater, agricultural nutrient loads, ports, dredging, fisheries and climate pressures.

SWAN recommends that open-net salmon farming be phased out within a transition period, with no new or renewed licences during that period. Farmed carnivorous finfish should be removed from definitions of sustainable aquaculture, and policy support should be redirected towards research on and development of lower-impact approaches, including low-trophic aquaculture, native oyster restoration where ecologically appropriate, integrated multi-trophic aquaculture and closed or land-based systems where these can demonstrate lower water-quality and biodiversity risk.

Aquaculture monitoring should be public, water-body specific and linked to WFD and MSFD reporting. Monitoring should cover hydrographical conditions, eutrophication, seafloor integrity, marine litter, non-native species, water quality, benthic condition, sea lice, fish escapes, pesticide and medicine use, and impacts on protected habitats and species. The Plan should also require a transparent and independent enforcement system with consequences for non-compliance, including fines, licence revocation or cessation of operations for repeated breaches. The use of the 15% disturbance threshold inside protected areas should end.

Q2. Additional comments on ambition

Ambition should be measured against legal and ecological need, not against what is administratively convenient.

If a water body is not at good status, or is at risk of deterioration, the Plan must identify what is required to achieve or protect its objective. Exemptions should be used only where legally justified and transparently documented.

At-risk water bodies must not be excluded from targeted supplementary measures unless exemptions are applied in line with Article 4 of the WFD and the rationale for each exemption is clearly set out. WFD non-deterioration and objective obligations have binding effects in project authorisation and cannot be treated as merely programmatic objectives.

The Fourth Water Action Plan must also explicitly assess whether current programmes are sufficient. Where they are not, the Plan must identify additional supplementary measures. This was a core SWAN ask in the third-cycle submission and remains essential.

Issue 6 – Any further comments

Q1. Additional comments on the Significant Water Management Issues for the fourth cycle

The SWMI process should be more transparent and accessible

The consultation should provide clearer explanation of how submissions will be used, how issues will be selected, and whether there will be further public engagement before the draft Water Action Plan. The Department should publish a public summary of submissions and explain how significant issues and proposed measures are being carried forward.

Pressure-by-pressure implementation annexes

The Fourth Water Action Plan should include pressure-by-pressure implementation annexes for the main significant pressures. Each annex should identify water bodies affected, legal drivers, existing measures, additional measures required, responsible bodies, timelines, funding, monitoring indicators, public reporting and escalation mechanisms.

Water as critical national infrastructure

Water quality should be treated as critical national infrastructure for public health, food systems, biodiversity, climate resilience, flood management, recreation, tourism and local economies. This was identified in the SWAN workshop where members framed water as a shared public good with health, biodiversity, economic and climate implications.

Stronger political leadership for water

Government should consider stronger political leadership for water, including a dedicated Minister or Departmental lead with authority to coordinate delivery across sectors. This should be framed as an optional governance reform, not a substitute for the concrete implementation, enforcement and pressure-specific measures set out above.

The fourth cycle must be the cycle of consequences

Where measures fail, they must be strengthened. Where voluntary action is insufficient, mandatory measures must follow. Where licences are inadequate, they must be reviewed. Where enforcement is weak, it must be resourced. Where water bodies continue to decline, the response must be immediate and transparent.

The Fourth Water Action Plan must be judged by one test: whether it restores and protects Ireland's waters in line with the Water Framework Directive.

