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EPA COMMENTS ON THE DRAFT WSSP

Overview

The EPA welcomes the publication of Irish Water's draft Water Services Strategic Plan (WSSP) as a high level strategy setting out how water services will be delivered in Ireland over the next 25 years. The plan shows that Irish Water is committed to achieving quality outcomes for waste water and a safe and secure drinking water supply.

Strategic Approach

The strategic approach to investment and long term planning for the water service sector is welcome. The EPA considers that the final plan must be more ambitious in striving to achieve compliance with both the objectives and requirements of the 1991 Urban Waste Water Treatment Directive and the 1998 Drinking Water Directive. Full national compliance must be achieved well in advance of 2040 and that such an extended timeline is not satisfactory.

The EPA supports Irish Water's commitment to undertake an interim review of the WSSP. This is an important step to align it to pending water-sector plans (e.g. River Basin Management Plans). The subsidiary Tier 2 plans also offer the opportunity for a national, time-bound and prioritised approach to key issues in the water sector. For example, plans currently in progress on lead, drinking water safety plans and on waste water compliance. Further Tier 2 plans should include on Public Information/Communication, THM Reduction, Disinfection, and Pesticides. The EPA will comment individually on these plans as they are developed.

Priorities

The Strategy should focus on achieving compliance at the earliest opportunity and also set out the key interim milestones to achieving full compliance. While there is a requirement to prioritise resources within the short to medium term, it is necessary to set out the full roadmap to compliance within the context of this long-term plan.

The challenge of meeting the current legal requirements set in EPA waste water discharge authorisations should be addressed in the WSSP.

Climate change has the potential to impact significantly on our water resources and water services infrastructure and will affect the entire hydrological system regardless of size, and infrastructure is also likely to be vulnerable. A full climate resilience approach is necessary as part of the Tier 2 climate change plan.

Customer Expectations

Irish Water should continue to develop systems to present data to the general public. Irish Water should develop a pro-active communication programme for key risks. Additional options for effective communication should be considered, e.g. presenting information on water quality investment in tandem with account statements.

Protect and Enhance the Environment

The strategy should adopt a holistic water cycle approach to provide for all aspects of water management (including resource efficiency) throughout the water cycle. As part of the strategy the work on dangerous and emerging substances should be targeted at discharges to drinking water sources and shellfish areas.

Irish Water should outline their strategy for working on source protection. The strategy should consider the requirements of Article 7(3) of the WFD regarding drinking water protected areas, i.e. aim to reduce the level of treatment required in the production of drinking water (which promotes taking action within the catchment to improve raw water quality).

The EPA sees the management of sludges arising from domestic wastewater treatment systems as a national priority as this is an area in which action by the homeowner is being actively promoted and is a legal requirement.

SEA RELATED COMMENTS ON THE DRAFT WSSP AND SEA ENVIRONMENTAL REPORT

1. Integration of SEA and AA in the WSSP

It is not clear how the SEA and AA processes have influenced and informed the preparation of the WSSP. A description and schematic should be included in the Executive Summary and the WSSP describing and showing the link between the SEA and AA processes and the WSSP preparation. These should indicate how and where the SEA has informed the WSSP. In the SEA Environmental Report, Figure 1.4 *Linking the SEA and the WSSP* shows the integration of the processes and could be extended to include the Appropriate Assessment process and included in the WSSP. The integration of the WSSP and SEA process should reflect the overall objective of the SEA Directive “to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes”.

2. Baseline Environment

Relevant aspects of the Baseline Environment description in *Appendix C Baseline Information* and key maps should be included in the main body of the text of the Environmental Report. This should include a description of the implications of the WSSP on specific key relevant aspects of the environment and be accompanied by relevant map based information.

The interrelationships between the relevant environmental aspects should also be highlighted and reflected where relevant in the assessment of effects.

3. Alternatives

An overview of the alternatives considered in the development of the WSSP along with the reasons for selecting the preferred approach or combination of approaches adopted should be included in the Plan.

The alternative approaches to achievement of compliance with the requirements of the Urban Waste Water Treatment Directive and Wastewater Discharge Licence Emission Limit Values should be further explored with EPA. This is with a view to ensuring the objectives and commitments in the WSSP reflect environmental obligations and licence conditions.

4. Mitigation and Enhancement Measures

It is not clear to what extent the Mitigation Measures proposed in *Section 4.5 Mitigation and Enhancement* and *Table 4.9 Cross-Cutting Mitigation Measures* and in *Appendix D Assessment Matrices* are or will be reflected in the Plan.

A commitment should be considered for inclusion in Objective 4 and 5 to review the assessment of the flood risk of all water and waste water related infrastructure with a view to developing a prioritised programme to alleviate the risk of flooding. This should be informed by the Flood Directive CFRAMS and associated Flood Risk Management Plans.

Where Mitigation Measures proposed relate to projects, these should be reflected in the WSSP as well as in the proposed *Sustainability Policy and Framework*.

5. Monitoring and Reporting

The Monitoring Framework set out in *Table 5.1 Potential Indicators for Monitoring Effects* should be further developed in consultation with the relevant statutory environmental authorities. The monitoring programme should be flexible to take into account ongoing national monitoring programme developments. The environmental monitoring should be linked with WSSP Implementation monitoring and reporting. The outcome of monitoring should be reviewed at mid-term of the 5 yearly review period. The proposed WSSP Implementation Group referred to above

could have a role in review of the Environmental Monitoring Programme and associated environmental monitoring reports.

The scope of the monitoring should include both positive and potentially negative aspects with a view to capturing the overall performance of the WSSP. Consideration should be given, where appropriate, to the inclusion of relevant thresholds to identify when unforeseen adverse environmental effects and trigger appropriate remedial action where required.

The scope of transboundary related monitoring and datasets should be developed in consultation with the relevant Northern Ireland authorities.

6. Future Amendments to the WSSP

Where amendments to the Plan are proposed prior to adoption, these should be screened for likely significant effects in accordance with the criteria as set out in Schedule 1 of the SEA Regulations and should be subject to the same method of assessment applied in the “environmental assessment” of the Plan.

7. SEA Statement – “Information on the Decision”

Following adoption of the WSSP, an SEA Statement should be prepared summarising information on the decision and should be sent to any environmental authority consulted during the SEA process.