

Public Consultation on the National Inspection Plan for Domestic Wastewater Treatment Systems 2015-2017

The EPA published a report on the implementation of the National Inspection Plan for Domestic Wastewater Treatment Systems for 2013-2014 along with proposals for the 2015-2017 Plan in February 2015. The public were invited to comment on the proposal for the 2015-2017 Plan. In addition, several stakeholder groups were invited to meetings to discuss the published proposals. 77 submissions were received in total and they are summarised below.

A questionnaire to inform the feedback on the proposals was included in the proposals for the 2015-2017 Plan. 62 individual questionnaires were completed and submitted. A summary of the findings of the questionnaire is included in the Consultation Summary below as submissions 14-76 and in more detail in Appendix A.

The EPA's assessment and comments on each of the submission topics is included at the bottom of each table. The assessment in some cases has resulted in changes to the proposed Plan or proposed actions to be taken by the EPA; these are highlighted at the end of the table.

CONSULTATION SUMMARY

| No. | Organisation | Proposed Period of the Plan | Risk Assessment | Registration | Engagement |
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| 1 | Cork Co Co | In agreement | In agreement | <p>Cork County Council suggests that there should be a national campaign to encourage non-registered householders to register their systems with Protect Our Water.</p> <p>Cork Co Co suggest that this be linked to the proposed €100 water conservation grant to be given to all households who register with Irish Water, i.e. the grant is only payable where the householder is connected to a public sewer or a registered septic tank.</p> <p>Whilst Cork County Council agrees that unregistered systems identified for inspection should be required to register, the comparably small number of inspections to be carried out under N.I.P will mean that the impact of this step will be low.</p> | In agreement |
| 2 | Cavan Co Co | | In agreement | <p>It will prove very difficult, post a successful/passed inspection, to persuade home owners to register their system, given their inspection is complete. Enforcement of this will prove extremely time consuming and costly for the local authority. If all elements of the inspection have passed or if the home owner has carried out remedial works to improve the system then the risk to human health and the environment will be significantly reduced. Therefore, in terms of prioritising work within the local authority, it would be unlikely that a local authority will initiate legal action for non-compliance with the registration process.</p> <p>Perhaps, a fixed penalty notice system, similar to the Litter Pollution Acts, could be considered moving forward in terms of the system registration element of the Regulations, rather than the Local Authority being required to potentially initiate legal action if a passed system home owner fails to register their system.</p> | The development of a communication strategy as a template for Local Authorities is crucial to ensuring the citizen engagement element of the Regulations is continued and successful. |
| 3 | Kerry Co Co | In agreement | In agreement. Shellfish areas already taken into account in site selection process in Kerry. | | It is our experience that the single biggest issue being encountered during inspections is the failure to de-sludge treatment systems. However, there appears to be an issue with regard to capacity for onward disposal and treatment of such sludges which would need to be addressed at national level and in consultation with Irish Water. We have been very pro-active in rolling out the engagement strategy at local level to date. The potential resource-implications for local authorities of the expansion of the engagement strategy would need to be considered and assessed. |
| 4 | FORCELINK | | | | |
| 5 | Neil Meehan (Site Assessor) | | | | |

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| 6 | National Federation Group Water Schemes (NFGWS) | | | | Some issues to be addressed in the engagement strategy: <ul style="list-style-type: none"> • addressing misconceptions; • Practical Information on de-sludging; • Health implications • Dangers of landspreading ST contents. Call back system from sludge collectors. Incentives - reduced price for regular de-sludging contracts; tax rebate. |
| 7 | Water Framework Directive Integration and Co-ordination Unit | In agreement | Agree - further consideration with respect to shellfish areas in the coming months | In agreement | In agreement |
| 8 | Irish Creamery Milk Suppliers Association (ICMSA) | | | | EPA/LA should avail of local radio slots, Ag shows on TV; Make homeowners aware of Grant and HRI. Need to make homeowners aware of requirements for de-sludging on problems caused by not de-sludging. |
| 9 | Irish Rural Link | | | | Data clearly shows that through proper education and consultation with communities that the failure rate of wastewater systems can be greatly reduced. Room for improvement in consulting with communities. IRL - part of Digital Switchover - informal meetings through local volunteers - good model that could be replicated. Information on how to operate and maintain your system is essential. |
| 10 | Zero Waste Alliance | | | | |
| 11 | FH Wetland Systems | | | | |
| 12 | Sustainable Water Network (SWAN) | Premature to base a further three year Plan on the preliminary findings of the first year of the Plan. There is a lack of assessment of or metrics for the 2013-14 Plan, lack of substantial active engagement activities and deficit on the enhanced communication plan for the 2015-17Plan. SWAN does not agree with this proposal. SWAN proposes a one year Plan for 2015 with assessment using metrics on behavioural change, engagement strategies, wider DWWTS compliance and remediation impediments. Then a 2 year Plan for 2016-17 if still not available then another 1 year plan etc. | It is unfortunate that there is reference to the relatively 'low risk' nationally posed by DWWTS, SWAN cites numerous papers stating significant threat to water quality. In the absence of load apportionment data, danger of underestimating loads from DWWTS. May pose a significant threat at sub-catchment level. Supports the risk based approach – SWAN is concerned about the selection by the LA of the priority areas and sites for inspection. Welcomes the addition of the shellfish areas. | | SWAN recommends a well-resourced and adequately funded citizen engagement programme by trained professionals. Submission sets out key elements of successful public participation/engagement. Not possible for SWAN to give a full response without having the communications strategy proposed in place. SWAN claims that there is no assessment of findings of the first year of inspections. They ask will research metrics be used to assess and alter the Plan between now and the end of the proposed plan in 2017? SWAN recommends the use of local groups. Activities are communication and not engagement and will not deliver the results for behavioural change. |
| 13 | Environmental Pillar's Environmental Law Implementation Group (ELIG) | | ELIG does not agree with the relative low risk of DWWTS compared to UWWTP/Ag. Need more focus on Ireland's legal obligations, this is missing from the Plan. | | No real detail on how engagement strategies are to be resourced, financed and their content and evaluation and adjustment cycles. The ability of the engagement strategy to change behaviour has not been evaluated and there is no detail on what is proposed for the next 3 years |
| 14 - 76 | Submissions forms from members of the public (62 in total) | | | | In summary the submissions indicated that they would like to receive reliable information on: <ul style="list-style-type: none"> • Systems and standards required • Remediation requirements and standards • Contractors for desludging There should also be regular information via radio and TV. |

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| 77 | Individual who did not complete submission form | | | | |
| | EPA assessment and comment on the submissions received | Under legislation a review of the National Inspection Plan is required every 5 years. The EPA has decided to reduce this to the development of a one year and now three year Plan to tie in with the River Basin Management Plan. The draft RBMP will be published at the end of 2016 and will include reference to the proposed next NIP. There will also be annual reporting on the implementation of the Plan and if there are major issues identified either through the WFD work or the annual reporting the EPA can re-visit the timeframe. | There was consensus for the inclusion of shellfish areas. In relation to the impact of DWWTS, the Plan notes that a key item is the protection of public health from risks to drinking water wells/borehole and ponding of sewage. Odour could also be an issue in some cases. Overall, from a water-protection perspective the nutrient load from domestic wastewater treatment systems on a national scale is relatively low in comparison to agricultural activities and urban wastewater discharges. However there are, however, areas of the country where the potential nutrient risk from treatment systems at a local level may be significant, for example where there is a direct discharge to the headwaters of a small stream or protected pearl mussel areas etc. While it is accepted that the pollutant load for septic tanks is not fully quantified, work being carried out as part of a EPA research project and the WFD characterisation on load apportionment will determine the relative risk posed by domestic wastewater treatment systems compared to other pollution sources and therefore further inform the appropriate number of inspections for the next cycle of the Plan from 2018. | Proposals relating to national awareness campaign, link to water conservation grant and fixed penalty system will be passed on to the Department of Environment, Community and Local Government (DECLG). Issues around selecting unregistered properties for inspection will be raised at the regulators network group. | Engagement activities in the first year included the distribution of leaflets; information was placed on EPA and LA websites; stakeholder meetings; advertisements, articles and interviews in local media. The EPA Strive funded project 2013-W-DS-12 will deliver a framework for the development of an engagement strategy including metrics. The EPA will set up a new regulators network group covering Engagement. This working group will be responsible for developing an engagement strategy for use by all local authorities. The suggestions made during the consultation period will be considered by the Engagement Working Group. The funding model for the strategy is dependent on what is proposed. Broader metrics such as sludge collected from DWWTS are being measured and will be reported on in the EPA annual reports. |
| | Proposed Changes to Plan / Actions Planned | No change to the proposed three year Plan covering the period 1st January 2015 – 31st December 2017. The EPA is committed to revising the plan and the risk assessment methodology if sufficient new information comes to light through research, WFD characterisation or annual reporting in the intervening period. | Shellfish catchment areas to be included in the risk assessment methodology. The EPA is committed to revising the plan and the risk assessment methodology if sufficient new information comes to light through research, WFD characterisation or annual reporting in the intervening period. | No change to enforcement recommendation on registration covered in the Plan. Proposals will be passed on to the DECLG. The terms of reference of the regulators network group will include reference to provision of guidance in relation to unregistered sites to ensure consistency of approach. | No change to the engagement work outlined in the Plan. The EPA will set up a regulators network group to develop engagement strategies. Data on the collection of DWWT sludge will be used as a metric. |

| No. | Organisation | Inspection: Frequency | Inspection: Site Selection | Inspections: Enforcement | Protecting Private Wells | Complaints/ other inspections |
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| 1 | Cork Co Co | In agreement | <p>Cork County Council query how they can prioritise unregistered properties. Unregistered properties cannot be identified from the DWWA GIS system or from the listing of registered properties which Protect Our Water provides to LA's (eastings and northings given in the Protect Our Water list of registered properties only identify the townland, they are not specific for each property).</p> <p>Can additional sites be selected for inclusion under the NIP over & above the number specified by the EPA where such sites are selected due to their proximity to a sensitive receptor, e.g. sites close to bathing waters, water abstraction or shellfish water, where local knowledge has identified that there is a potential untreated discharge to sensitive waters?</p> <p>Any further guidance on the practical aspects of inspections would be very welcome.</p> <p>The DWWTS workshop held in April 2014 was a useful means of sharing knowledge among inspectors, & Cork County Council would like to see it repeated in 2015.</p> | In agreement | <p>Cork County Council is in agreement with this proposal to provide private wells leaflets to householders at the time of the inspection.</p> <p>An information seminar on the risks to private wells is welcomed.</p> <p>An incentivised private well testing scheme may result in a lot of private wells being shown to be polluted. This may substantially increase complaint numbers to LA's from householders with polluted wells which would have an impact on staff resources to investigate such complaints.</p> <p>Will it be possible to incorporate these sites into the NIP inspection plan if the suspected source of contamination is a DWWTS?</p> | <p>Cork County Council suggest that the most appropriate way to register complaints and other inspections such as water pollution incident investigations that relate to domestic wastewater treatment systems, is to use the existing DWWA system. The DWWA system has all the DWWTS in the country mapped, it is already available to, & used by, all LA's, & already captures the necessary data that needs to be recorded. All DWWTS inspections would be captured in the same format & could be mapped & viewed together.</p> <p>There are a couple of options that could be considered;</p> <ul style="list-style-type: none"> • All complaints and other inspections such as water pollution incident investigations that relate to domestic wastewater treatment systems would be included under the NIP inspection programme. This would have the added benefit that any remedial works arising out of such inspections would be potentially eligible for grant aid under the DWWTS grant scheme. <p>or</p> <ul style="list-style-type: none"> • If DWWTS complaints & other DWWTS inspections are not be included under the NIP inspection programme they could be recorded in the DWWA but given an alternative prefix to the inspections done under the NIP so that they can be distinguished for statistical purposes. There could be a number of alternative inspection Types in the register to include Complaint, Protected Area Inspection, (e.g. shellfish, bathing waters, water abstraction), etc. |
| 2 | Cavan Co Co | | <p>Local Authorities should be requested to share their approaches on the procedure and tools used for the selection of unregistered properties. This could be done via the working group on NIECE and will assist in Local Authorities learning the "what to do" and "what not to do" from each other and also to ensure that there is uniformity of approach across the country i.e. everyone is targeting unregistered properties and not using the process to deal with pollution complaints.</p> | | | <p>Prior to the EPA working with the CCMA to investigate possibilities for the development of a data management system to capture this data, the EPA should establish how Local Authorities are currently capturing this data to avoid "re-inventing the wheel". There may be sufficient data capture and management already in place within the majority of Local Authorities so an e-mail to relevant contacts within the Local Authority should be an easy way for the EPA to establish the baseline for this from the outset prior to establishing a further data management tool which is likely to do the exact same as what is already in existence within most local authorities.</p> |

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| 3 | Kerry Co Co | In agreement | Kerry Co Co has adhered to this requirement to-date and will continue to do so into the future. However, consistency is required among all local authorities in relation to requests received to have inspections carried out in order to avail of the national grant scheme available for up-grading of domestic wastewater treatment systems. A clear direction on this should issue at national level. Local Authorities should continue to target unregistered sites. The registration system as currently established does not easily lend itself to the targeting of unregistered sites. At a practical level, it is difficult to identify unregistered properties due to the lack of clear information on the locations of registered properties. | Currently comply | The proposals in relation to provision of guidance on protecting wells and for the provision of incentivised well-testing scheme are welcomed. | Kerry Co Co currently use the ICT-based complaints management system which was developed by Westmeath County Council to track all such complaints and up-grades. The system has been found to be excellent for this purpose. |
| 4 | FORCELINK | | | | | |
| 5 | Neil Meehan (Site Assessor) | | | | | |
| 6 | National Federation Group Water Schemes (NFGWS) | | | | | |
| 7 | Water Framework Directive Integration and Co-ordination Unit | In agreement | In agreement | In agreement | In agreement | |
| 8 | Irish Creamery Milk Suppliers Association (ICMSA) | Agree that they should not be increased | | | | |
| 9 | Irish Rural Link | Where public health is at risk the number of inspections may be increased. | | | | |
| 10 | Zero Waste Alliance | | | | | |
| 11 | FH Wetland Systems | | | | | |
| 12 | Sustainable Water Network (SWAN) | Inadequate inspection regime on the basis of an overarching assumption of relatively low risk. Not enough evidence to support the adequacy of 1000 inspections - it constitutes a resource rather than science driven regime. SWAN does not support 1,000 inspections but does not propose what is an adequate number. SWAN states that the number of inspections is insufficient to effectively detect and deter against faulty DWWTS. | Information on what an inspection involves and the advisory notice template should be included in an appendix. SWAN supports the risk based approach but is concerned about the selection by the LA of the priority areas and sites for inspection. LA discretion introduces a level of potentially problematic subjectivity into site selection. Concerned about potential conflict of interest and very real threat of litigation - poor planning decisions by LA. Wants seasonality to be addressed. Supports integration with WFD. EPA should approve LA priority areas and site selection in advance and a minimum should be subject to prior audit. | SWAN welcomes emphasis on close out of advisory notices but wants specific mention that they no longer pose a risk to human health or the environment. Action tracking should be key part of DWWA system. There are no administrative sanctions so it is up to LA to come up with steps before recourse to the courts- this is not ideal. | Supports all measures | Wants all investigation to be tracked and not just 'investigate' the possibility. |

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| 13 | Environmental Pillar's Environmental Law Implementation Group (ELIG) | There is inadequate information on why the inspections are still limited to 1000, which was to facilitate ramping up by LA. This does not constitute an informed or precautionary approach to an issue which can present locally significant public health and environmental risks. | ELIG expresses concern regarding the discretion afforded to LA re: site selection, conflict of interest. | | | |
| 14 - 76 | Submission forms from members of the public (62 in total) | | A lot of people would like to be able to request to be inspected. They also would like to know more about what is involved in an inspection and what to look for to see if they have a problem. | | | |
| 77 | Individual who did not complete submission form | | Expressed concern that he could not request an inspection even though he knows there is a problem with his system. | | | |
| | EPA assessment and comment on the submissions received | <p>A number of submissions supported the retention of the minimum of 1,000 inspections per year; however, two submissions raised issues with the evidence for such a decision. While it is accepted that the pollutant load for septic tanks is not fully defined, work being carried out as part of the WFD characterisation on load apportionment will inform the number of inspections once it is completed. In the meantime, as the OSPAR PARCOM work shows that the P/N load from septic tanks is estimated as being significantly less than that for urban wastewater and agriculture and having regard to the number of inspections in these sectors, a minimum of 1,000 will be retained for the period of this Plan. The annual review of the Plan allows for new evidence to come forward. Based on the findings of the review the EPA will then determine whether a new Plan is required and if so it will be issued for Public Consultation. It is important to note that additional inspections may be carried out by individual LA if there is evidence at a local level that domestic wastewater treatment systems are causing an issue in particular catchments.</p> | <p>Some concerns have been raised in relation to the local authorities' application of the site selection methodology. Local authorities should document their application of the site selection methodology. This allows the justification for the selection of the priority areas and individual sites to be documented and assessed.</p> <p>A regulators network group will be established to ensure consistency of approach and provide further guidance on the selection of unregistered sites.</p> <p>Integration audits are carried out by the EPA to assess the statutory performance of local authorities, the application of the site selection methodology amongst other aspects will be included in criteria assessed during the audits.</p> <p>Allowing individuals to request inspections would be counterproductive in terms of the application of the risk assessment methodology.</p> <p>A brief outline of the inspection and the inspection form will be included in the Plan. More information on the inspection is available on the EPA website. The issue of available information will be raised with the Engagement working group.</p> | <p>The tracking of the closing out of the advisory notices will include reference to the impact on human health and the environment.</p> <p>The Enforcement Policy working group will provide guidance on the close out of advisory notices.</p> | <p>The EPA will highlight the recommendation for an incentivised private well testing scheme with the DECLG. The EPA will provide all local authority inspectors with copies of the private well leaflets and will arrange an information seminar to inform them of the risk posed to private wells. Complaints should be dealt with outside of the NIP.</p> | <p>In the short term the EPA will examine what tracking mechanisms are already in place for septic tank complaints.</p> <p>Following on from this the EPA will consider the idea of incorporating the complaints into the DWWA subject to IT system development approval.</p> <p>All complaints will be tracked by local authorities.</p> <p>As the proposal for inclusion of all septic tank complaints into the NIP is a policy matter for the DECLG, the EPA will raise it with them.</p> |

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| | Proposed Changes to Plan / Actions Planned | <p>No change to the proposed minimum inspection numbers. The EPA will have regard to the load apportionment work being undertaken by the WFD integration Unit and will review the minimum number as appropriate. Any revision of the inspection numbers will be subject to public consultation.</p> <p>Local authorities will be informed that they can carry out additional inspections if there is evidence that domestic wastewater treatment systems are posing a significant risk in a local area.</p> | <p>Local authorities will be reminded in the new Plan of the requirement to develop local site selection plans and that the allocated number of inspections are a minimum therefore they can inspect more if there is evidence that domestic wastewater treatment systems are posing a significant risk in a local area.</p> <p>The terms of reference of the regulators network group will include reference to the documentation of the application of the site selection methodology and provision of guidance in relation to unregistered sites and to ensure consistency of approach.</p> <p>EPA audits will include an assessment of the application of the site selection methodology by the local authorities.</p> <p>A brief outline of the inspection process will be included in the Plan. A copy of the inspection form and a copy of the Advisory Notice template will be included as an Appendix to the Plan.</p> | <p>The reporting aspects will include a reference to the tracking of the close out of advisory notices and the impact on human health and the environment.</p> <p>The terms of reference (ToR) of the regulators network group will include a reference to the provision of guidance on the close out of advisory notices.</p> | <p>No change to the proposed Plan. The EPA will highlight the recommendation for an incentivised private well testing scheme with the DECLG. The EPA will provide all local authority inspectors with copies of the private well leaflets and will arrange an information seminar to inform them of the risk posed to private wells.</p> | <p>No change to the proposed Plan. The EPA will examine the existing complaint tracking mechanisms and will consider, if necessary, the expansion of the DWWA system to accommodate complaints. The inclusion of complaints in the NIP will be raised with the DECLG.</p> |

| No. | Organisation | Water Quality/Discharge to Waters | Sludge management | Grant Aid | Planning Permission | Statutory Performance Assessment |
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| 1 | Cork Co Co | Cork County Council suggest that any review of the Water Pollution Act Section 4 discharge licensing process should be carried out at a national level to ensure there is consistency of approach among LA's. It is recommended that discharge to surface water should be a last resort due to the difficulty in monitoring such discharges if they become very numerous. Given that the biggest issue identified to date has been lack of maintenance, Cork County Council would query whether individual householders would ensure compliance with any license parameters set. | | Cork County Council suggest that all householders whose DWWTS require remediation or upgrading should be eligible to apply for DWWTS grant aid. In many existing cases householders complain that they are unable to finance remediation works, & the provision of grant aid would help to alleviate this problem. Cork County Council Elected Members have raised this issue on a number of occasions & have made representations to the Minister for the Environment in this regard, requesting that the DWWTS grants be made available to all householders who need to upgrade or repair their systems. | | |
| 2 | Cavan Co Co | | Cavan County Council added the following sentence to the letter to be sent by the Water Services Authority to notify the owner of an inspection - <i>"You are advised that your wastewater treatment system requires regular de-sludging and if it is due to be de-sludged, it may be beneficial to have your system de-sludged prior to this inspection by a permitted contractor. A record should be kept of de-sludging."</i> This decision was taken given the significant number of advisory notices that had to be issued relating solely to the issue of de-sludging. The generation of advisory notices is a time consuming administrative process involving CEO Orders, etc. so this decision has improved the efficiency of the implementation of the NIP, the inspections required in Cavan and the administration associated with same. | | | Cavan County Council acknowledge the guidance and support provided by the EPA team since the commencement of this process in terms of on the ground queries as well as queries relating to the DWWA system on EDEN. |
| 3 | Kerry Co Co | We support any such review process. However, it is also imperative that the national research projects aimed at identifying alternative on-site wastewater treatment and disposal options are progressed to finality in order to provide clear guidance for sites which have poor percolation characteristics. This is particularly relevant for such sites, which do not have ready access to appropriate receiving waters for direct discharge. | While we would support such an approach, as per earlier response it is our experience that the single biggest issue being encountered during inspections is the failure to de-sludge treatment systems. However, there appears to be an issue with regard to capacity for onward disposal and treatment of such sludges, which would need to be addressed at national level and in consultation with Irish Water. | The national grant scheme available for up-grading of domestic wastewater treatment systems is currently limited to householders who have been issued with an advisory notice and has a number of strict eligibility criteria attached. In our opinion, there is a need for some form of a broader grant scheme which would be available to householders for the up-grading of systems even in circumstances where the treatment system has not been the subject of an inspection under the National Inspection Plan. | | There is a need for the EPA to ensure a consistency among local authorities with regard to the failure criteria that are applied for the inspection process. |
| 4 | FORCELINK | | | | | |
| 5 | Neil Meehan (Site Assessor) | | | | | |

| No. | Organisation | Water Quality/Discharge to Waters | Sludge management | Grant Aid | Planning Permission | Statutory Performance Assessment |
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| 6 | National Federation Group Water Schemes (NFGWS) | | Pilot community initiative. The NFGWS believes that there is potential for a pilot project that will test the capacity of group water schemes to co-ordinate and incentivise septic tank de-sludging – particularly for bundles of householders with septic tanks sited in the Zone of Contribution of the Group Water Scheme source. | | | |
| 7 | Water Framework Directive Integration and Co-ordination Unit | In agreement | In agreement | | | |
| 8 | Irish Creamery Milk Suppliers Association (ICMSA) | | | Householders should be made aware of Grant and its provisions and the Home Renovation Incentive Scheme. | Planning Permission should also not be required for remedial works that are not subject to an Advisory Notice, in order to encourage individuals who are aware that their Domestic Wastewater Treatment Systems are not operating correctly to carry out necessary remedial works. | |
| 9 | Irish Rural Link | | | Increase in grant and staging of the grant payment. Must address aged systems. Grant is inadequate for low income families and the elderly. | | LA must be given adequate resources to continually meet their allocation. |
| 10 | Zero Waste Alliance | | The core of the submission relates to source separation of wastewater and the need to recycle the nutrients in order to prevent waste. They also call for a 'very radical' revision of the CoP - switch from the creation and treatment of wastewater to segregation of wastewater. The submission outlines the legal supports, the finite phosphorous resource, proposed amendments to Building Regulations and guidance for segregation from other countries. | | | |
| 11 | FH Wetland Systems | | Inadequate sludge infrastructure in place. LA should set up a dedicated de-sludging team to provide tank maintenance funded by septic tank tax and water charges. Constructed wetlands and willows are good for sludge remediation and are an environmental and cost effective way of dealing with sludges. | No incentive to do upgrade works as would lose out on the grant - disincentive. LA should be allowed to grant planning directly free of charge where an upgrade is planned. Broad range of service providers should be included on LA website | Reluctance on part of homeowners to do anything because they cannot volunteer to be inspected and have to go through a costly and difficult planning process and lose out on the grant. | |

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| 12 | Sustainable Water Network (SWAN) | Concerns regarding a simplified consent process given the LA inconsistency track record for Section 4 licensing. | The 50% deficit in sludge infrastructure should be emphasised. The Plan should consider connection of clusters to UWWTP as recommended in the WFD 2008 Programme of Measures study. SWAN would like to see a commitment that EPA will liaise with IW and DECLG on this matter. The amount of sludge collected should be reported upon. | A well-funded grant aided remediation programme to fix systems which are posing a risk to human health and the environment is required - do not believe this is currently being provided. Householder poverty is an issue. | | SWAN recommends high level of training, prescriptive guidance, constant oversight and regular auditing on the part of the EPA. Also recommends that each LA Plan is approved and signed off by the EPA - if not feasible then there should be random audits before implementation to ensure rigorous application of site selection criteria. Oversight and enforcement of LA inspection activities is required. SWAN does not understand the role of the Statutory Performance audits and how it will ensure correct site selection. Wants number of DWWTS inspections that will be audited under the system and ongoing scrutiny. |
| 13 | Environmental Pillar's Environmental Law Implementation Group (ELIG) | Lack of criteria in the Plan to determine whether a site should be dealt with under the Water Pollution Act or Inspection Regime | Sludge research very valuable. Want EPA to contact DECLG and Department of Health (DoH) to raise issue of insufficient sludge capacity urgently. The inadequate infrastructure is constraining the effectiveness of the Plan. Art 8 of the 1975 Waste Framework Directive - under capacity casts serious concerns over this obligation. | | | |
| 14-76 | Submissions forms from members of the public (62 in total) | | | In summary, the submissions indicated a wish for general access to grant assistance to undertake improvement works and to have tax relief on improvement works without having to be inspected under the NIP. | | |
| 77 | Individual who did not complete submission form | | | Even though he knows there is a problem with his system, he cannot afford to have the works done without grant assistance. The grant should be more widely available or you should be able to request an inspection. | | |
| | EPA assessment and comment on the submissions received | The fact that 39% of the country has a high likelihood of inadequate percolation indicates that there is a need to examine solutions for these areas. The EPA research findings into low permeability sites will be published and will influence policy in this area. The matter of enforcement of any modified consent process will be included in any discussion on the topic. The powers to control pollution are very similar in the Water Pollution Act and the Water Services (Amendment) Act (WSA) the only real difference is the 10 days advance notice of an inspection for the WSA. Where the risk is to human health and the environment tight timeframes for remediation | Domestic wastewater sludge management is a major concern for the EPA. The issue has been raised with Irish Water through submissions on the Irish Water 'Water Services Strategic Plan' as well as in the Regional Waste Management Plans. It will also be raised with DECLG and DAFM. The pilot sludge collection initiative proposed by the NFGWS is welcome and the EPA will support this initiative as requested. The EPA will formally write to all local authorities reminding them of the importance of ensuring compliance with the waste collection permit regulations and the sludge management plans. | Allowing individuals to request inspections would be counterproductive in terms of the application of the risk assessment methodology. Proposals relating to the widening of the grant scheme will be passed on to the Department of Environment, Community and Local Government. | Proposals relating to planning permission exemptions will be passed on the DECLG. | The EPA has a statutory performance role with respect to local authority implementation of the National Inspection Plan. In order to assist in the consistent implementation by local authorities the EPA will establish three sub working groups on site selection/ inspection; enforcement policy and engagement. Specific instruction will issue to all LAs on the 2015-2017 Plan including advice on site selection; sludge management; close out of advisory notice; assessment criteria for risk to human health and the environment; EPA audits and any other advice as appropriate. The EPA audits will include an assessment of overall implementation by the local authorities. |

| No. | Organisation | Water Quality/Discharge to Waters | Sludge management | Grant Aid | Planning Permission | Statutory Performance Assessment |
|-----|--------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| | | should be applied. | | | | |
| | Proposed Changes to Plan / Actions Planned | <p>No change to the proposed Plan. Proposals to deal with low permeability sites will be raised with the DECLG upon publication of the research findings. The Terms of Reference (ToR) for the regulators network group on Enforcement Policy will include reference to the importance of tight timeframes for sites where there is a risk to human health and the environment. The draft ToR for site selection and inspection will include reference to the difference in the use of the WPA and the WSA.</p> | <p>No change to the proposed Plan. The EPA will continue to highlight the need for a national strategy to cover wastewater sludges. The EPA will support the NFGWS pilot scheme. The EPA will write to all LAs in relation to sludge management.</p> | <p>No change to the proposed Plan. Proposals relating to the grant scheme will be passed on to the Department of Environment, Community and Local Government.</p> | <p>No change to the proposed Plan. Proposals relating to planning permission exemptions will be passed on the DECLG.</p> | <p>No change to the proposed Plan. The EPA will establish three regulatory working groups on site selection/ inspection; enforcement policy and engagement. Specific instructions will issue to all LAs on the 2015-2017 Plan.</p> |

| No. | Organisation | Other | Review Data Comments | Resources |
|-----|--------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1 | Cork Co Co | | | |
| 2 | Cavan Co Co | | | |
| 3 | Kerry Co Co | | | |
| 4 | FORCELINK | Proposes use of Forcelink software to schedule and execute inspections, to record the data capture and create a portal view of the data. | | |
| 5 | Neil Meehan (Site Assessor) | Inspectors to recommend the use of site assessors. Site assessors to be included in any future training in this area. Wants to see re-instatement of LA list of approved assessors. | | |
| 6 | National Federation Group Water Schemes (NFGWS) | | | |
| 7 | Water Framework Directive Integration and Co-ordination Unit | The Plan is logical, appropriate and clearly written. Support the approach outlined. | | |
| 8 | Irish Creamery Milk Suppliers Association (ICMSA) | Messages - people do not know their responsibilities - need to be informed. Where the Code of Practice does not apply, clarification on standards is needed. | | |
| 9 | Irish Rural Link | Need greater co-operation between LA and homeowners - new creative methods to inform homeowners. Best way to meet homeowners is face to face. | | |
| 10 | Zero Waste Alliance | | | |
| 11 | FH Wetland Systems | Change in peoples' consciousness is need - adequate funding of SWAN. Change focus from mechanical systems to systems such as willow. Source separation technologies should be considered especially given the possible short fall in the future availability of energy, rock phosphate and natural gas dependent nitrogenous fertilisers. The COP requires grey and black water combination rather than separation. A more holistic approach is needed rather than simply a response to the ECJ ruling. Offer of assistance to EPA. | | |
| 12 | Sustainable Water Network (SWAN) | Will 2015-17 NIP be revised in light of findings of subsequent reviews and WFD characterisation work? What input will the public have? | Implementation and results from the first year should be compared to the Aims & Objectives of the Plan (not set out in consultations doc or original plan). 21% of sites still non-compliant 6 months after the close of the 12mth Plan. Review presents an overly positive picture. Fig 10 needs more interpretation. Link between failures and measures to be made. Root cause of problem should be identified for open advisory notices. Highlight challenges and management issues. Issues with discharges to surface waters and inadequate percolation should be highlighted and addressed in new Plan as significant issues. Recommends an amended Review and Assessment report and separate 2015 NIP. Insufficient information on remediation. For closed advisory notices - what were the issues, how was remediation checked if not subject to verification inspection. What measures secured closure of advisory notice? Lack of baseline data or aims and objectives again which to judge the Plan's performance. No | NIP will only be successful if adequate resources are allocated to the EPA and LA to ensure that adequate temporal and spatial frequency of inspections, meaningful long term citizen engagement strategy and grant aided remediation. |

| No. | Organisation | Other | Review Data Comments | Resources |
|---------|----------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------|
| | | | <p>metrics other than inspection results.</p> <p>1. No of non-compliant systems after advisory notice complied with. 2. Cause of these persistent non-compliant sites and delay in addressing them? 3. Key findings and management implications from 1. & 2 and how this has informed the second NIP? Additional information to be included on a. sites in areas where there is inadequate percolation , b. lack of sludge capacity, c. 39% of post 2000 secondary treatment systems that failed. d.55% of advisory notice relating to de-sludging still open 6 months after end of plan. Highlight more challenging sites - how are they being resolved and their timeline? Data should be presented as percentages.</p> | |
| 13 | Environmental Pillar's Environmental Law Implementation Group (ELIG) | <p>ELIG wish to discuss the new Plan prior to publication to ensure that their concerns have been taken into account. Training of judiciary is required. No mention of the ECJ case. The evaluation of the Plan does not evidence or evaluate compliance with the obligation of art 4 of Waste Directive - the new plan does not present a credible approach for future compliance with this obligation. Lack of clarity as to what constitutes a risk to health or the environment - 22 months into this approach.</p> | <p>ELIG does not agree with the positive slant on Ireland's compliance.</p> <p>Wants more detail on the unresolved cases and their risk to human health - requires more analysis.</p> | |
| 14 - 76 | Submissions forms from members of the public (62 in total) | | | |
| 77 | Individual who did not complete submission form | | | |
| | EPA assessment and comment on the submissions received | <p>One submission proposes the use of a proprietary data management system; however, the EPA has already developed an in-house system DWWA. Suggestions for future training for site assessors will be communicated to the WSNTG.</p> <p>Adequate funding for engagement strategies, more co-operation and clear messages required for a change in behaviour.</p> <p>Consideration for a change in emphasis towards source separation is not a matter for the NIP.</p> <p>Any major revision to the NIP will be subject to public consultation.</p> <p>The TOR of the sites selection/ inspection working group will include a reference to the definition of 'risk to human health and the environment'.</p> | <p>Comments are relevant for the Review of the first year of implementation report but at not relevant for the Plan.</p> <p>Some suggestions for data analysis have been presented. These will be considered in the preparation of the 18 month review and subsequent review reports but are not relevant for the Plan.</p> | <p>Resources are a matter for each local authority and the EPA to take up with the DECLG.</p> |
| | Proposed Changes to Plan / Actions Planned | <p>No change to the Proposed Plan.</p> <p>The EPA will continue to engage with stakeholders in relation to the plan and its implementation.</p> <p>The ToR for the regulators network group will include reference to the definition of 'risk to human health and the environment'.</p> | <p>No change to the Proposed Plan.</p> <p>Proposed changes to the data analysis will be considered in the preparation of the 18 month review and subsequent review reports.</p> | <p>No change to the Proposed Plan</p> |

APPENDIX A: CONSULTATION QUESTIONNAIRE SUMMARY

NATIONAL INSPECTION PLAN | Domestic Waste Water Treatment Systems

Consultation on Proposals for 2015-2017

64 questionnaires were received: 62 from members of the public and 2 from organisations. The responses to the questionnaire summarised below.

| <i>Question 1: Despite widespread media coverage of registration and inspection of domestic waste water treatment systems, 67% of respondents to a survey had not sought out information on these systems.</i> | | | |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------|------------------|
| Did you try to find out information? | Yes - 39 | No - 25 | Not answered - 0 |
| <ul style="list-style-type: none"> If yes, what prompted you to do so? – give details | <p>I heard about the need to register my septic tank and about inspections and wanted to know more.</p> <p>I wanted to be sure my system was working properly.</p> <p>I was curious/generally interested in finding out what was happening.</p> <p>I wanted to know what was needed to comply.</p> <p>I saw press reports or heard media coverage of the issue.</p> <p>I was concerned about my system needing work and wanted information.</p> <p>I received communications from the County Council and wanted to learn more.</p> <p>I am a site assessor for septic tanks.</p> | | |

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|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------|------------------|
| <ul style="list-style-type: none"> • If no, what prevented you from doing so? <ul style="list-style-type: none"> ○ Was it a lack of awareness of where to find the information? If so, what information would be helpful? ○ Was it a fear that your system might require costly work to be carried out? ○ Was it a lack of awareness of the possible health risks posed by such systems? ○ Other reason | | | |
| | Yes - 7 | | Not answered - 2 |
| | Yes - 7 | | Not answered - 1 |
| | Yes - 7 | | Not answered - 1 |
| | <p>I didn't see the need or felt there was no reason to do so.</p> <p>I didn't think this government initiative would come to anything.</p> <p>I already knew enough.</p> <p>I already have a maintenance contract so I felt I was covered.</p> <p>I got enough information on the subject.</p> <p>I am waiting until I get notified about having an inspection.</p> | | |
| <p><i>Question 2: The review has found that the main reasons for systems failing the inspection are due to a failure to desludge or operate/maintain a system properly. Actions to address these issues would not qualify for grant assistance.</i></p> | | | |
| <ul style="list-style-type: none"> • Are you surprised at this finding? | Yes - 10 | No - 51 | Not answered - 3 |
| <ul style="list-style-type: none"> • Did you realise that these are necessary to make sure your system works properly and doesn't pose a threat to your health? | Yes - 54 | No - 6 | Not answered - 3 |

| | | | |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <ul style="list-style-type: none"> Did you know that it is a legal requirement to maintain your system so that it doesn't pose a risk to human health or the environment? | Yes - 46 | No - 13 | Not answered - 4 |
| <ul style="list-style-type: none"> On hearing that most systems should not require major works, are you more likely to check out your system and take any necessary actions, such as desludging the tank (approximate cost €250)? | Yes – 38 I am already doing this – 16 | No - 5 | Not answered - 4 |
| Question 3: What further supports would be helpful? | | | |
| | <i>Engagement & Information</i> | <i>Financial assistance</i> | <i>Inspections</i> |
| You said would you like: | Reliable information on: <ul style="list-style-type: none"> Systems and standards required Remediation requirements and standards Contractors for desludging Regular information via radio and TV | To be able to access grant assistance to undertake improvement works Tax relief on improvement works | Free inspection for information purposes with no onus to rectify problems immediately To be inspected That the inspection should not frighten the homeowner |