



Headquarters, PO Box 3000  
Johnstown Castle Estate  
County Wexford, Ireland  
Ceanncheathrú, Bosca Poist 3000  
Eastát Chaisleán Chaile Sheáin  
Contae Loch Garman, Éire  
T: +353 53 916 0600  
F: +353 53 916 0699  
E: [info@epa.ie](mailto:info@epa.ie)  
W: [www.epa.ie](http://www.epa.ie)  
LoCall: 1890 33 55 99

EPAC Reference No 0125

Water Advisory Unit  
Water Action Plan Work Programme Consultation  
Department of Housing, Local Government and Heritage  
Custom House, D01 W6X0

Email [rbmp@housing.gov.ie](mailto:rbmp@housing.gov.ie)

25 July 2025

**Re: Consultation on the timetable and work programme for Ireland's 4<sup>th</sup> cycle Water Action Plan 2028-2033**

Dear Fintan,

The Environmental Protection Agency (EPA) welcomes the opportunity to respond to the Consultation on the timetable and work programme for the development of the 4<sup>th</sup> cycle water action plan which will run for the period 2028-2033.

As outlined in the Water Action Plan 2024, and in the most recent [EPA Water Quality in Ireland](#) report, overall, 46% of our waters are in unsatisfactory ecological condition. Excess nutrients from agriculture and wastewater, and impacts to the physical habitat conditions (hydromorphology) are the primary issues which are impacting on our waters. The [latest EPA report on nutrient conditions in our waters](#) has shown that while nitrogen concentrations have improved nationally between 2023 and 2024, they remain too high in the southeastern half of the country. Phosphorus concentrations are stable, but also remain too high locally. Further actions will be needed to reduce excess nutrients to sustainable levels before improvements in the ecological health of our waters will be achieved.

The reduction of nutrients will also need to be supported by improvements to the hydromorphological condition of our waterways, which will in turn also help increase the resilience of our aquatic ecosystems in managing additional stresses and impacts due to climate change.

One of the key messages in the EPA State of the Environment Report 2024 was the urgent need for a national policy position on the environment to address the complex interactions, synergies and trade offs across and between different policy areas. We welcome therefore the acknowledgement in the consultation document that the 4<sup>th</sup> cycle water action plan will need strong linkages with other plans and Government policies. We would call out in particular the need to integrate that water action plan with the biodiversity action plan, the climate action plan and the nature restoration regulation, as well as policies and strategies that are centred on those activities that may impact on the water environment, such as for example, the Urban Waste Water Treatment Directive, the Nitrates Directive, the CAP Strategic plan, the Arterial Drainage Act and the National Planning Framework.

We also welcome the commitment to continue and sustain the focus on adopting a catchment management approach to addressing water quality issues; on targeting the right measure in the right place; and on prioritising measures that can achieve multiple benefits where possible. The EPA will continue to build and evolve the evidence base to underpin and support this approach.

The 4<sup>th</sup> cycle plan will need to be based on robust assessments of whether the current measures are delivering water quality outcomes, and whether those outcomes are adequate to achieve the environment objectives, for each waterbody. The Catchment Management Work Plans and the Sectoral Action Work Plans proposed in the Water Action Plan 2024, as well as the [EPA's analysis of the gap to achieving WFD objectives](#), should form the basis for these assessments. New or additional measures may be required in some waterbodies where the targets are not being met. It is important that the 4<sup>th</sup> cycle plan includes sufficient flexibility so that new evidenced-based measures can be identified and implemented as required, using an adaptive management approach, without having to wait 6 years for the next cycle plan. The new Programme Delivery Office, with its focus on tracking progress with implementation, is a welcome addition to the governance structures in that regard.

The 2<sup>nd</sup> and 3<sup>rd</sup> river basin management plans contained significant advances in how the State is working towards achieving the Water Framework Directive objectives, and it is evident that the new governance structures, increased investment in flagship programmes that are focussed on targeting measures, and the community engagement approaches, are still bedding in. The 4<sup>th</sup> plan should build on these plans and drive towards increasing the scale and pace of implementation. Substantial investment is needed for example, to deliver the requisite level of compliance and resilience in Ireland's water services infrastructure. Similarly, while there are many positive actions being implemented on farms to address agricultural issues, and there are improvements in water quality in some areas, these are being offset by declines elsewhere. The next programme of measures should also consider the need for climate resilience and adaptation to the management of our water resources, as well as protecting and restoring water quality.

The EPA recognises the value in the collaboration, engagement and feedback between and amongst public bodies involved in water management throughout the governance structures. The structures in place for communities to engage, facilitated by their local Community Water Officers, and the new Catchment Fora are also very welcome. Consideration should be given to how best to deepen and strengthen engagement with these existing structures in the development of the next plan.

A healthy environment is fundamental to our economy and our health and wellbeing. We look forward to continuing our engagement with all the stakeholders throughout the WFD governance structures as we progress through the process of developing the next plan.

Yours sincerely

A handwritten signature in cursive script that reads "Eimear Cotter .". The signature is written in a dark grey or black ink on a light grey rectangular background.

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Dr. Eimear Cotter

Director, Office of Evidence and Assessment