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Re. Submission on the Significant Water Management Issues for Ireland's 4th cycle Water Action Plan 2028-2033

A chara,

The EPA welcomes the opportunity to provide a submission on the Significant Water Management Issues (SWMI) as part of the development of Ireland's 4th cycle Water Action Plan 2028 to 2033. The central challenge for the next Plan is clear: Ireland has significant evidence, programmes and structures in place, but water quality is not improving at the scale or pace required. The next Plan must therefore shift decisively from activity to measurable delivery, with targeted measures, stronger compliance, clearer accountability and transparent assessment of whether actions are working.

Latest water quality

The EPA published its latest comprehensive, 3-yearly report on Water Quality in Ireland, for the period 2019 to 2024, in October 2025. The report found that water quality had improved in some areas but the long-term trend of overall decline was continued. The key findings were:

- Just over half (52%) of our surface waters are in satisfactory ecological condition, which was a slight deterioration from the previous assessment for 2016-2021 where 54% of surface waterbodies met their water quality objectives.
- Excess nutrients from agriculture, urban wastewater and other human activities remains the biggest challenge, followed by changes to the physical habitat conditions (hydromorphology).
- There is some evidence that nutrient levels have been reduced in areas where actions have been targeted, which is very welcome.

- The scale and pace of implementation of targeted actions to improve water quality needs to be significantly increased.

The recent EPA Water Indicators Report 2025, released in June 2026, found little overall change in water quality in 2025. Improvements in some areas are being offset by declines elsewhere, reinforcing the need for targeted actions to be implemented at greater scale and pace.

The overall picture is one of continued decline since WFD monitoring commenced. It is now clear that Ireland will not meet the EU and national goal of restoring all waters to good or better status by 2027. The next Water Action Plan must therefore be more ambitious, more urgent and more focused on delivery. Targeted action is delivering local improvements, but it is not yet sufficient to reverse national decline.

Issues and pressures

While there are a range of pressures impacting on water quality, this submission is focussed on a small number of issues considered as a priority for the next plan.

Excess nutrients from agriculture and wastewater

Excess nutrients from agriculture and waste water remain the most prevalent pressure impacting on water quality. Immediate, substantial and sustained reductions in nitrogen and phosphate pollution are required to prevent further deterioration in water quality, especially in the southeastern half of the country.

Achieving full compliance with all existing legislative requirements is the minimum requirement and must remain the highest priority. Recent EPA reports on urban waste water, the national agricultural inspection plan and the national inspection plan for domestic waste water show that while there is some progress towards that objective, there are ongoing challenges that must be addressed urgently:

a) The rate of non-compliance for 2025 under the National Agricultural Inspection Plan was 43% on first inspection. Approximately half of those inspected had brought their farms into compliance by the second visit, which is welcome. Local Authorities must prioritise follow up and enforcement as part of their agricultural inspections.

b) Discharges from 59% of licenced urban waste water treatment plants do not consistently meet the required effluent quality standards. Of those, approximately half were due to operational failures while the remainder were due to infrastructural deficits. Each year, over 500 incidents at treatment plants are caused by equipment breakdowns and issues with the operation and maintenance of the plants. Uisce Eireann must develop a clear plan to achieve compliance across all sites and drive down the number of incidents by improving operations and maintenance.

c) Approximately 6 of 10 domestic waste water treatment systems failed inspection in 2025, with a significant number identified as a risk to human health and the environment. On a positive note, the number of advisory notices open for more than two years decreased from 523 to 442 between 2024 and 2025, and by the end of 2025, 84% of systems that had failed inspection between 2013 and 2025 had been fixed. Local Authorities need to increase enforcement, including prosecution where warranted, to resolve faulty domestic wastewater treatment systems so that the environment and public health are protected.

Significant investment is already in place to address nutrient pollution, including farm advisory and engagement programmes, domestic wastewater grants, Uisce Éireann investment plans, local catchment projects, additional farm inspection resources, catchment science training and the EPA evidence base used to target measures. The issue is no longer simply the absence of activity. It is whether actions are sufficiently targeted, implemented quickly enough and delivering measurable improvements.

The main problems and the required responses are well understood. The priority now is to localise the problems and solutions, accelerate implementation and ensure that the rate of improvement outstrips the rate of decline. The next Water Action Plan should also place greater emphasis on preventing deterioration, including through education and awareness, engagement and support, compliance promotion, inspections and enforcement. The EPA will continue to include WFD objectives as part of the National Enforcement Priorities that underpin the Recommended Minimum Criteria for Environmental Inspection (RMCEI) planning for Local Authorities.

Hydromorphology

Hydromorphology, the physical condition of waterbodies, is the second most prevalent issue affecting the ecological health of Ireland's waters. Healthy aquatic ecosystems need appropriate flows, water levels and tidal regimes; diverse habitat in channels, banks and riparian zones; and good connectivity to support the movement of fish, sediment and cooler waters.

The human activities or pressures impacting on the hydromorphological condition include urban infrastructure and development in or near surface water bodies; drainage; barriers, dams, locks and weirs; overgrazing; removal of riparian vegetation; and abstractions or other significant modification to flow, water level and tidal regimes. Of these, the most widespread impact on waterbodies nationally is the alteration of channels through drainage and the removal of riparian zones.

The evidence base and measures to address hydromorphological impacts are less developed than those for nutrients and will require additional focus in the 4th River Basin Management cycle. Improving hydromorphological condition will also be increasingly important for climate resilience as higher temperatures, lower oxygen levels, droughts and floods become more prevalent. Measures that address hydromorphology while also supporting biodiversity, climate adaptation, flood management, health and wellbeing should be clearly identified and prioritised.

Chemical pollution

The next Water Action Plan should strengthen the management of chemical risks to water quality. The EPA Water Quality in Ireland 2019-2024 report found that all surface water bodies failed to achieve good chemical status due to exceedances of environmental quality standards for Polybrominated Diphenyl Ethers (PBDEs) and mercury in biota. Failures for PBDEs, mercury and Polycyclic Aromatic Hydrocarbons (PAHs) in water are considered ubiquitous. However, leaving these aside, based on the representative subset of water bodies in the monitoring programme, 18% failed to achieve good chemical status pointing to specific problems that need to be addressed.

Some of the chemicals detected are Persistent Organic Pollutants (POPs) under the Stockholm Convention. In many cases these chemicals are now banned, but legacy sources remain from past use. The EPA recommends four priority actions for inclusion in the next Plan (with further detail provided in Appendix 1):

1. Targeted chemical monitoring to address key chemicals of concern and emerging contaminants;

2. Development of guidance for Local Authorities for managing chemical incidents and exceedances;
3. Development of a national strategy for managing PFAS and dealing with legacy contaminated sites; and
4. Integrated and coherent management of chemical risks to waters across multiple policy objectives.

Climate change

The EPA funded a large-scale research project called The WFD Future Scenarios and Management Tools project (2020-W-CD-3) which is currently in the final stages of review. The objective of the research was to assess the possible future impacts of climate change on water quality. Some of the key findings are as follows:

- River flows are projected to become significantly more seasonal in the future, with increased winter discharge and reduced summer and low flows, heightening both flood risk and hydrological drought risk depending on the time of year.

- Nutrient losses from agricultural catchments will dominate water quality outcomes and are projected to further increase under future climate change scenarios. This may lead to measurable deterioration in water quality especially in the south and southeast.

- Modification of channels, longitudinal sediment connectivity and riparian corridor condition were among the most important indicators of riverine hydromorphological condition under future climate change scenarios.

These findings highlight the need to future-proof the Programme of Measures for a changing climate. Enhanced climate resilience and adaptation measures, including improved hydromorphological condition, will be needed to reduce future risks to water quality.

The National Climate Change Risk Assessment (NCCRA), published by the EPA in 2025, provides a comprehensive national overview of the risks and opportunities posed by climate change for Ireland and will be a helpful resource to inform the 4th Water Action Plan. Water is a key medium in the risks posed to Ireland by climate change, including its relationship with ecosystems and biodiversity, cascading impacts on water infrastructure and water security.

Policy coherence

The next Water Action Plan should act as a delivery framework that aligns water, agriculture, land use, climate, biodiversity, planning and restoration measures at catchment level. With increasing demands on public resources, and with the anticipated decrease in the budget to support the next Common Agricultural Policy 2028-2034, the Plan should be explicit about where multiple benefits can be achieved and what structures or measures are needed to deliver them.

Integrated catchment management provides an evidence-based way to align policy objectives, consider synergies and trade-offs, and to target measures where they are most needed. The development of Catchment Action Trackers, as signalled in the Water Action Plan 2024, will be a key step in bringing transparency to where actions are being implemented, what they are achieving and how pressures are being characterised. EPA is committed to supporting their development and recommends integrated catchment management remains clearly in focus for the next Water Action Plan.

The need to adopt a strategic approach to land use was a key message in the 2024 State of the Environment report. Land is a finite, valuable resource that must be managed wisely. Land use

decisions must adopt a holistic approach that simultaneously supports climate action, nature restoration and economic sustainability. The integration and targeting of measures across all national policies and plans has significant potential to:

- deliver multiple benefits for water quality, air, nature and biodiversity, flooding, climate and health;
- support the achievement of good environmental outcomes as the foundation for our health and wellbeing; and
- make the best use of public funding and resources.

The agricultural sector, as key landowners and stewards of the rural landscape, is central to the development and implementation of catchment-based measures that deliver multiple benefits. The next agri-environment scheme should build on and mainstream the learning from the Farming for Water EIP, and be strengthened to deliver measurable water quality improvements as part of a wider package of outcomes for climate action, soil health and biodiversity. In doing so, the next Water Action Plan can help align on-farm practice with the ambition of Food Vision 2030 for Ireland to be a world leader in sustainable food systems, recognising that climate resilience, healthy soils, biodiversity recovery and water quality are mutually reinforcing and must be addressed together.

The Water Action Plan 2024 signalled the need for Water and Planning Guidance, a new consolidated legislative regime to address pressures on the physical condition of waters, and a review of the Arterial Drainage Act. These measures overlap with the Land Use Review and the Nature Restoration Law and will be important tools for good land management, multiple benefits and improved water quality. They should be progressed urgently.

The EPA notes the development of the National Nature Restoration Plan, expected to be finalised by the end of 2026. There are specific interactions between the Nature Restoration Regulation and the WFD, including Article 4 on restoration of terrestrial, coastal and freshwater ecosystems, and Article 9 on restoration of the natural connectivity of rivers and floodplains. The next Water Action Plan should consider how WFD measures can support nature restoration under Regulation (EU)2024/1991 and vice versa. Consideration should also be given to Ireland's obligations under the RAMSAR Convention on Wetlands of International Importance, and to opportunities to align measures in the Climate Action Plan and the National Biodiversity Action Plan to maximise water quality, environmental and health benefits.

Governance and implementation structures

The Programme Delivery Office's role in tracking implementation and driving additional action where needed should strengthen accountability, support timely escalation and close a gap previously highlighted by the EPA.

Collaborative engagement across and between all public bodies with roles and responsibilities intersecting with the environment is fundamental to the success of the plan and for achieving multiple other policy objectives. Priority should be given to continuing to strengthen these relationships.

The EPA acknowledges the completion of the review of Local Authority resources for water functions and the development and recent submission of the business case for additional resources. While additional resources are always welcome, it is essential that in the interim, the Local Authorities prioritise their water functions and collaborate with the River Basin Management Service team (formerly LAWPRO) to target the necessary work. The EPA, through our oversight

role of Local Authorities and through the NIECE network, will continue to ensure that compliance and enforcement actions to protect water are prioritised and implemented, for example for agricultural activities, domestic waste water treatment systems, misconnections and other discharges to water.

Assessing the effectiveness of measures, data access and sharing

The EPA recommends that the key question the next Water Action Plan needs to address is '*Are the measures working*?' The evidence shows that despite 3 successive river basin management plans, overall, water quality is not yet improving at a rate that is sufficient to reduce the gap to achieving our statutory WFD targets. The EPA published an assessment in 2024 that identified that there are three key gaps that are hindering progress: *the measures gap, the effectiveness gap,* and *the evidence gap*. These gaps highlight the need for more targeted actions, a better understanding of measure effectiveness, and further investigation into waterbodies where data is lacking.

Analysis of whether, where and how measures are working should be a cornerstone of the 4th cycle plan. Where evidence shows that measures are not working, learning should be captured and measures strengthened at the earliest opportunity. This will support realistic expectations of what the Plan can achieve, build on successful outcomes and help ensure that water quality improvement finally outpaces decline.

Evidence-based assessment of measure effectiveness requires data on measures being implemented across all sectors, assessed against catchment water quality outcomes. Data sharing among public bodies remains a significant challenge and must be resolved without further delay so that public expenditure is targeted to best effect.

A delivery-focused Water Action Plan

The next Water Action Plan must be a delivery plan, not simply a continuation of existing activity. The evidence shows that targeted action can work, but it must now be implemented at greater scale, with clearer accountability and better evidence of effectiveness. The EPA is committed to working with the Department of Housing, Local Government and Heritage, public bodies and stakeholders to ensure that the 2028-2033 Plan delivers measurable improvements for Ireland's waters, environment and communities.

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Roni Hawe
Director
Office of Evidence and Assessment

Appendix 1: recommended actions for chemicals

Four specific actions for mitigating the impacts of chemicals are recommended for inclusion in the next plan as follows:

1. Targeted Chemical Monitoring Programme

    - Resources are needed for targeted monitoring programmes at potential sources to identify pressures on water quality from chemicals (including PFAS, brominated flame retardants, heptachlor), mercury, PAHs, metals, and pesticides (e.g. cypermethrin).

    - Development of data analytics and maps showing sources/potential sources to make chemical pressure data and results more easily available through WFD communications and websites.

    - Consideration of emerging chemicals and those new parameters now covered under the recast Urban Waste Water Treatment Directive including pharmaceuticals.

2. Guidance for Local Authorities on Chemical Incidents & Exceedances

    - Development of practical technical and policy guidance for regulators involved in chemical assessments, investigations, and follow up on EQS exceedances on water quality under the WFD. This should include expanding the roll out of the alert system for dissemination of elevated chemical results and follow up by relevant organisations.

3. National Strategy for PFAS and Legacy Sites

    - A national strategy is needed for PFAS and other legacy sites that are impacting water quality. This could include guidance on the management of PFAS contaminated sites which could draw from the Stockholm Convention's 'Guidance on best available techniques and best environmental practices for the management of sites contaminated with persistent organic pollutants.

4. Integrated Management of Chemical Risks to Waters.

    - Actions on chemicals under the WFD should be integrated and link into wider regulation of chemicals through for example EPA and LA licensing and permitting, Recast Urban Waste Water Treatment Directive, Sustainable Use of Pesticides Directive, Drinking Water Safety Plans, Local Authority Water Pollution Act, Waste Management Act, Local authority farm inspections, and regulation under chemicals legislation such as POPs and mercury. The overarching aim should be to consider risks to environment and health in an integrated way.