



**Consultation on the preparation of a Water Services Policy Statement - Template for Reply**

**Submissions should be made in writing and emailed to [wsp@housing.gov.ie](mailto:wsp@housing.gov.ie), to be received by 1pm on Wednesday 25 April 2018.**

**Name of Organisation / Respondent:**

**An Fóram Uisce (The Water Forum)**

No.	<u>Specific Questions</u> <u>(Optional) / Brief</u>	Response
Q.1	Do you agree with the three central themes identified for the policy statement?	<b>An Fóram notes and agrees with the three central themes identified for the policy statement but would request that in addition to these themes, Integrated Catchment Management should be added as a fourth theme. Failing same, ICM should be emphasised as a priority within each of the three central themes.</b>
Q.2	Do you have views on any specific policy aspects or elements relevant to the individual themes?	<b>An Fóram has a statutory responsibility in relation to rural water services and also the interests of the customers of Irish Water. Whilst the manner in which these services are delivered is different, they share the same underlying requirements of good quality and continuous supply of water and waste water services. These services, regardless of location or service provider, are of paramount importance in the context of domestic, commercial and community needs. From an environmental perspective, the provision of these services are in turn, reliant upon and impact on a quality environment. The issue of source protection is extremely important in the context of drinking water and the appropriate management of waste water is also of paramount importance. It is important that investment decisions are made based on these requirements. It is also necessary that in planning services, sufficient budgetary flexibility is provided to take into account emerging and unanticipated service issues and furthermore that issues identified in the review of rural water investments needs are provided for. Furthermore it is important the overarching requirements as specified in the Water Framework Directive are more clearly defined throughout the policy and that the State's responsibilities in relation to same, including the RBMP and other water services directives, are more clearly defined and linked. Furthermore, the State needs to set out how the targets to achieve compliance with these directives will be achieved. Finally, in the context of water conservation, An Fóram recommends that further consideration be given to this issue in planning and development legislation which will also link this theme with the future proofing theme.</b>
Q.3	Are there any areas which should be covered in the policy statement not covered by these thematic areas?	<b>Please refer to the issues raised at Q 2 above</b>

Q.4	Do you agree with the four principles underpinning the proposed policy statement?	An Fóram notes and supports the four principles outlined in the draft policy. We would recommend that the principle dealing with stakeholder engagement should be extended to refer to statutory and non-statutory stakeholder engagement. In noting An Fóram's role in terms of stakeholder engagement, our attention is drawn to the reference to transparency and accountability. It is considered that these requirements have a much wider remit and applicability beyond the functions of An Fóram. It is recommended that their emphasis or prominence is raised in the context of service management - either by adding them in as a fifth principle or by highlighting them at an earlier stage in the policy.
Q.5	Do you have views on any specific policy aspects or elements relevant to the individual principles?	An Fóram is supportive of the principle of a single publicly owned water services authority and would welcome an early clarification in relation to same. In particular, clarification is required in relation to the status of rural/private water supplies and how the concerns of this sector are addressed alongside the issues raised in relation to public water services. It is important that the resolution of this issue ensures that there are no unintended negative consequences.
Q.6	Are there any gaps not addressed by these principles?	As stated at Q4 above, the issues of transparency, accountability and effective public engagement need further attention as these issues have become pivotal in the provision and funding of water services. A further associated issue relates to communication and the importance of expert communication services in order to accommodate meaningful and effective engagement, awareness and education in the context of water services. An Fóram's role in relation to developing a national communications strategy should be noted.
Q.7	What should be the three key delivery priorities in relation to water services to 2025?	An Fóram considers that the three service delivery priorities should be: (a) The provision of safe and sustainable public and private water and waste water services in compliance with all relevant directives and consistent with the principles and requirements of effective integrated catchment management; (b) Sufficient and continuous funding of same; (c) ensuring that there is transparency, accountability and effective communications/engagement in relation to water services which is actively encouraged and facilitated.
	<b>Further comments and observations:</b>	An Fóram notes its role as described on page 30 of the document. We would suggest that this part of the document be amended to reflect the full extent of its statutory role as provided for in the Water Services Act 2017. An Fóram considers that it has a role in relation to all three themes (quality, conservation and future proofing) and would recommend that same be referred to throughout the policy. An Fóram considers that the policy statement should emphasise the importance of integrated catchment management, the protection of drinking water sources and the requirements of compliance with relevant legislation (national and European).