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**SUBMISSION TO THE COMMISSION FOR REGULATION OF  
UTILITIES ON  
IRISH WATER'S PROPOSED CONNECTION POLICY**

MARCH 2018



## **Introduction to An Fóram Uisce**

An Fóram Uisce (the Water Forum) was launched in April 2017. With the forthcoming commencement of Part 5 of the Water Services Act 2017, An Fóram will be the only statutory body representative of all stakeholders with an interest in the quality of Ireland's water bodies. An Fóram consists of 30 members including representatives from a wide range of organisations with direct connections to issues relating to water quality and also public water consumers. Approximately 50 different organisations were involved in the nomination of members.

In representing the various stakeholders, An Fóram has commenced engaging with the agencies and departments who have responsibilities under the Draft River Basin Management Plan (RBMP) for Ireland (2018 – 2021) as well as the wider water community. In the context of its remit regarding drinking water, An Fóram is also engaging with Irish Water and the Commission for Regulation of Utilities.

It is intended that these engagements will result in improved understandings and enable the emergence of a common policy platform on particular catchment management issues and on the overall area of water services provision including drinking water and waste water treatment.

An Fóram's main concerns in relation to the provision of drinking water is that the citizens of Ireland should have access to safe, potable drinking water supplies and in relation to waste water, that all services are provided and maintained in a manner that safeguards public health and environmental well being. The cost of access to both services, and their on-going service provision, should be based on an economically reasonable, fair and transparent basis.

## **Irish Water's Proposed Connection Policy**

An Fóram received a presentation from the CRU on the proposed policy at its meeting on the 20<sup>th</sup> February during which the proposed policy was discussed.

The following summarises the observations of the members of An Fóram and concerns that have been raised:

1. An Fóram welcomes the proposed policy in the context of moving towards a transparent and equitable charging system, regardless of geographical location.
2. An Fóram welcomes the guiding principles on which the CRU has based its considerations – cost reflectivity; efficient use of assets; equity and non discrimination; stability; simplicity and cost recovery.
3. An Fóram considers that it is most important that all households and business are charged a reasonable and equitable charge, based on stated economic costs and that all such charges are not prohibitive in terms of access. Any such barrier could result in public health issues and environmental concerns which could be counter-productive to the intent of the Water Framework Directive and the various Drinking Water regulations.
4. In this regard and in the context of environmental sustainability, An Fóram would suggest that, in the context of quotations for larger waste water connections, an incentive can be introduced for large scale industry and commercial users to pre-treat effluent prior to disposal into the mains service, thus reducing the load on waste water treatment plants operated by Irish Water.
5. An Fóram agrees with the CRU comments in relation to the need to conduct further comparative analysis in relation to costings and charging in other jurisdictions and would support such a requirement.
6. An Fóram also notes the CRU comments regarding issues requiring further consideration and looks forward to consultation in relation to same.
7. An Fóram has some concerns in relation to the proposals for connection charges to the Group Water Sector (where such connections are for the purpose of supply only) and would suggest that same be re-examined in the context of the important role that the Sector plays in service delivery in rural Ireland where Irish Water are not currently supplying services and do not intend to do so in the future.
8. There are also some concerns with regard to the costing model proposed for dual connections and multiple connections and it is recommended that same be re-examined to ensure that all such charges are based on the economic cost of such connections and not just a simple multiplier.
9. Should this consultation phase result in any significant change to the proposals, An Fóram would request that it be appraised of same and given an opportunity to comment further.
10. As with all new policies, issues will arise during the initial implementation which will require further consideration. Accordingly, An Fóram recommends that a formal review period is incorporated into the policy, to be carried out at end of year one and that such a review incorporates a customer consultation process culminating in a report from Irish Water to the CRU on the issues raised and the proposed solutions.

Finally, An Fóram would like to draw attention to concerns in relation to service provision in rural areas. Whilst not directly related to this current consultation, the underlying concern expressed by An Fóram in its submission on the Draft Water Services Guidelines For Planning Authorities (February 2018) is relevant in terms of the overall strategic plan for Irish Water and the deficit of attention within same to the requirements in rural Ireland. In that submission, An Fóram advised as follows:

*The concern of An Fóram relates to requirements outside of these areas in terms of arrangements for the provision of services in those towns/villages and the implications in relation to the security of drinking water supplies and contamination of water sources, groundwaters etc. arising therefrom. Put very simply, in the absence of ability to connect to Irish Water services, will citizens be forced to install private solutions which in turn could pose a significant threat to their own wellbeing and the wellbeing of the environment in which they build their home or business? Furthermore, what arrangements are being put in place to secure water sources for existing group water/communal/private sources which will not be referenced in Irish Water's database and thus may not receive the attention of the Planning Authorities in the context of source protection? It would be of concern to An Fóram if the efficiencies in terms of managing Irish Waters facilities and assets were to have a negative impact on the environment and public health in those areas (of which there are many) which are outside of their remit and database of information. It is considered that the Department should consider addressing this issue, particularly in the context of the objectives contained in chapter 5 of the NPF in relation to planning for rural places.*

## **Conclusion**

An Fóram would like to thank the CRU for this opportunity to submit in relation to the proposed policy and hopes that its views will be of assistance in finalising same and is available to assist in any way it can in relation to this process.

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