



SUBMISSION TO THE COMMISSION OF THE EUROPEAN UNION.

PUBLIC CONSULTATION TO INFORM THE FITNESS CHECK OF THE EU WATER FRAMEWORK DIRECTIVE, ITS ASSOCIATED DIRECTIVES (GROUNDWATER DIRECTIVE AND ENVIRONMENTAL QUALITY STANDARDS DIRECTIVE) AND THE FLOODS DIRECTIVE.

Introduction to An Fóram Uisce

An Fóram Uisce (the Water Forum) was established in June 2018 in accordance with the provisions of Part 5 of the Water Services Act 2017. An Fóram is the only statutory body representative of all stakeholders with an interest in the quality of Ireland's water bodies. An Fóram consists of 28 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.

The remit of An Fóram includes providing advice to Ireland's Water Policy Committee on matters pertaining to the objectives of the EU Water Framework Directive and also in relation to river basin management planning.

Consultation on the WFD fitness check.

An Fóram welcomes this public consultation in relation to the WFD which it considers to be a most important, overarching piece of EU legislation in the context of protecting our water environment. Even with the passing of almost 20 years, the WFD is still important, relevant and of necessity. Indeed, with the ever-increasing challenges facing our environment in the context of climate change, economic uncertainties and threats to public health, An Fóram considers that it is imperative that the environmental objectives set out in the WFD be retained.

It is of concern to all that the many of the aims and objectives of the WFD have not been achieved or only partly achieved in the context of protecting and restoring waters. An Fóram would consider that this is due to difficulties and challenges arising from implementation rather than the objectives contained within the Directive. Clearly, greater resources are required to support the various integrated catchment management

programmes which will contribute to focusing activities, increasing public awareness and participation, and facilitating meaningful public consultation. An Fóram considers that all of these activities are jointly and equally necessary in order to improve performance and effectiveness of integrated catchment management programmes.

During the process of completing the public questionnaire, An Fóram considered a number of issues in relation to the WFD and following same would make the following comments:

1. There is a major concern with regard to gaps between policy and implementation which can hinder, or even negate improvements e.g. insufficient investment in infrastructural water and waste water projects or conflicts between economic development and environmental requirements;
2. It is suggested that there are a number of important omissions from the questionnaire including:
 - measures to address invasive species;
 - nutrient pollution from domestic waste water treatment systems, such as septic tank systems.
 - the recovery and recycling of the nutrients nitrogen, phosphorus and potassium from waste water as a means of improving resource efficiency and improving food security, soil protection and sustainable progress.
 - the impact of abstractions;
 - the impact of aquaculture;
 - the presence of microplastics in water.
3. We have concluded that the 'one-out-all-out principle' should be maintained as an essential component of the WFD, with water body ecological status as the primary measure of the state of our water resources. However, we favour reporting of the state and progress of individual 'biological quality elements' (BQEs) in addition as a means of tracking progress and enabling a focus on the particular issues impacting on water quality.
4. The challenges for the agriculture sector in the context of loss of pollutants from the land which has a detrimental effect on more water bodies in Ireland than any other activity. However, it must be noted that farming takes place over a far higher proportion of the landscape than any other land use. It should also be noted that this sector is implementing a wide range of measures in order to address these issues including an advisory service to collaborate with and assist farmers in farming sustainably.
5. Some developments might have both benefits and disbenefits for the environment e.g. certain forestry and wind farm operations. We recommend that clearer consideration be given to both the benefits and disbenefits in undertaking environmental analysis.
6. The role of timelags in terms of policy development and implementation, and in assessing when improvements in water body status are likely to be feasible.

7. The importance of existing and potential impacts of flood defences on the ecological status of water bodies.
8. The use of targeted supports and incentives to enable additional water quality improvements for certain sectors, such as farming, while still ensuring compliance with the regulations.
9. We would encourage greater emphasis on the linkages between the various environmental Directives, particularly on the context of deriving co-benefits from the mitigation actions that arise from each Directive.
10. An Fóram is particularly concerned that there appears to be a low level of awareness amongst the public in general in relation to the status of our waterbodies and indeed the provisions and benefits associated with integrated catchment management and the implementation of the WFD. An Fóram is currently considering its role in terms of raising public awareness of these issues and the importance and vulnerability of our water environment.
11. Ireland is currently involved in the implementation phase of the 2nd cycle river basin management planning process wherein a considerable number of initiatives are being implemented. Included in these are a range of new structures and entities, all with roles in the context of policy development, implementation and/or oversight. An Fóram has very much welcomed these initiatives but would consider that it is too early, at this point in time, to evaluate their individual and collective effectiveness.

Conclusion

An Fóram would like to re-iterate its support of the WFD and to endorse its continuation in its current form.

An Fóram would like to thank the European Union for this opportunity to submit in relation to the review and hopes that its views will be of assistance in finalising same. In addition, An Fóram is available to assist in any way it can in relation to this process.

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