

Shaping the Future of Water Services

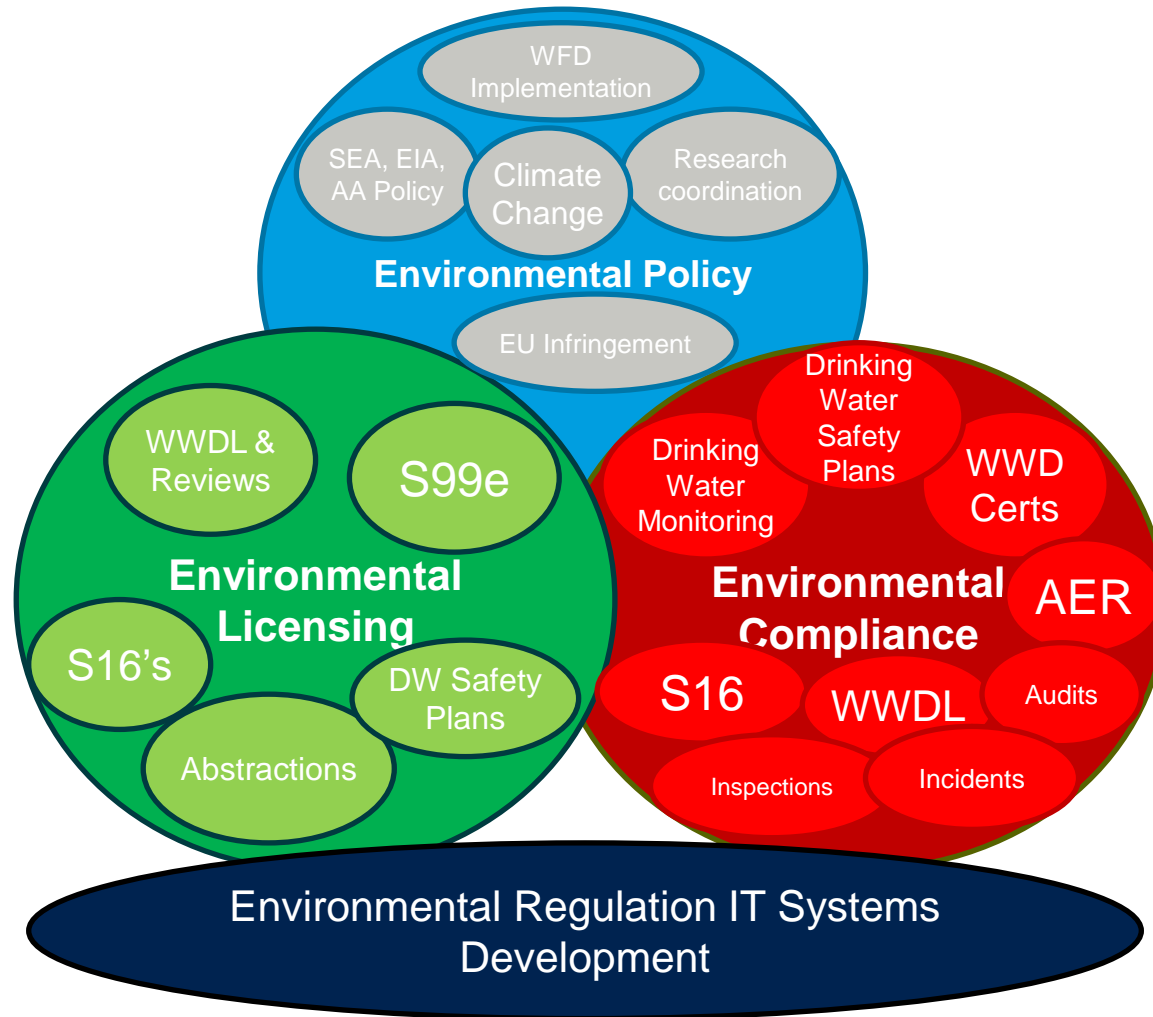
Responding to Environmental Regulation

Tom Stafford
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Irish Water

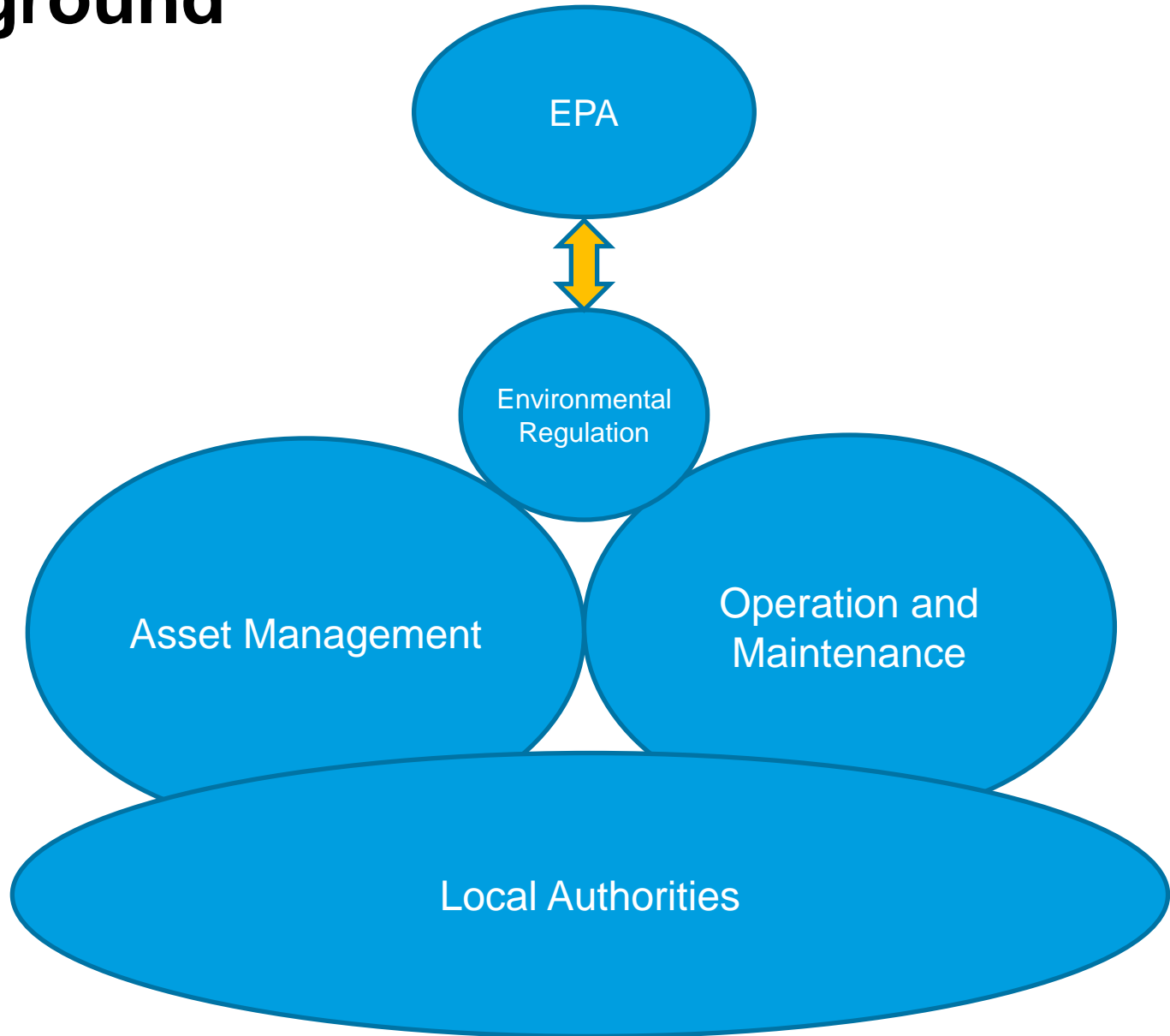


Comhshaol, Pobal agus Rialtas Áitiúil
Environment, Community and Local Government

Environmental Regulation



Background



Urban Waste Water

- Licences
- Certificates
- Monitoring
- Incidents
- Reports and assessments

UWW Licencing

Wastewater Discharge Licenses & Certificates

No. of WWDLs issued by EPA	363
No. of WWDL applications to be assessed by EPA	163
No. of open Requests for Information (RFIs) from EPA	84
No. of RFI's response correspondence issued to EPA by IW	108

No. of WW Certs issued by EPA	512
No. of WW Certs to be assessed by EPA	30

Discharge to Sewer Applications Received

No. of IPPC/IED Requests from EPA in 2014	8
No. of IPPC/IED Requests from Licencees' in 2014	7
No. of Section 16 Licence applications in 2014*	42
No. of Section 16 Licences issued in 2014	17
No. of FOG Licence applications in 2014	282
No. of FOG Licences issued in 2014	170



Sligo 2014

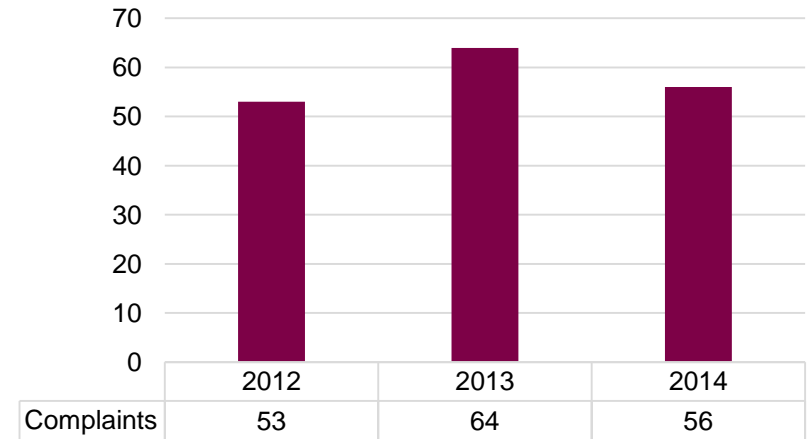
UWW Issues

- Licensing
 - *Applications now dated.*
 - *Some information is aspirational*
 - *Limits do not always reflect the impact of the discharge*
 - The notionally clean approach is not always appropriate
 - Prefer a more holistic contribution based approach (WFD!)

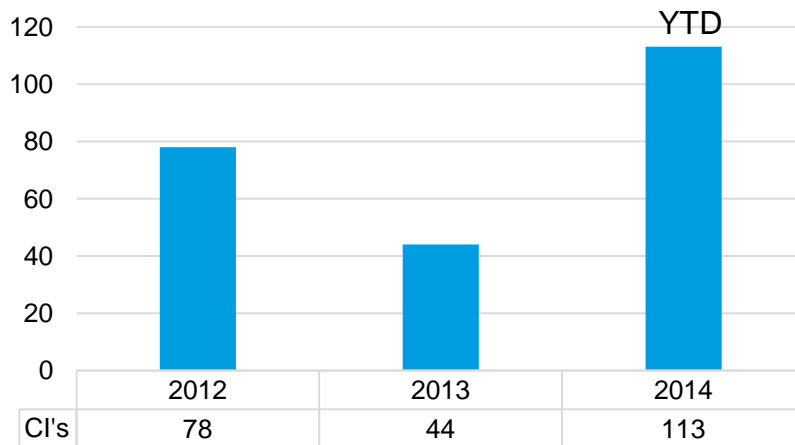
UWW Compliance

	Total	Open	Closed
Total number of UWW incidents	2200	471	1729
Total number of UWW complaints	178	77	101
Total number of UWW compliance investigations	235	150	85

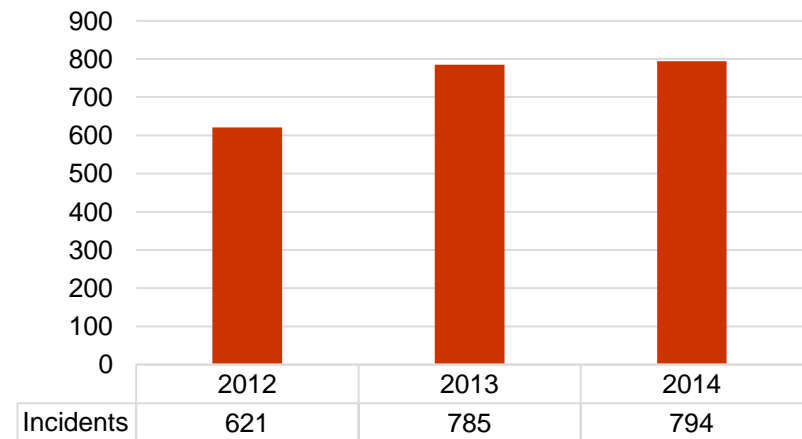
Complaints



Compliance Investigations



Incidents



UWW Compliance Issues

- Compliance
 - *Many of the timelines are aspirational and unachievable based on achieving very optimistic WFD objectives.*
 - *Many of the conditions overlap with water framework and other assessments, e.g. FPM, shellfish, drinking water abstraction.*
 - *Sampling regime needs to be tightened.*

Drinking Water

- Monitoring
- Incidents
- RAL
- Drinking Water Safety Plans
- Reports and assessments

Drinking Water Compliance Stats

Figure 5: Percentage of drinking water treatment plants compliant with Regulations

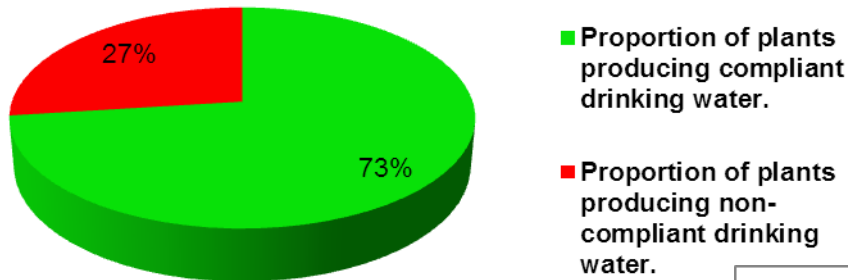
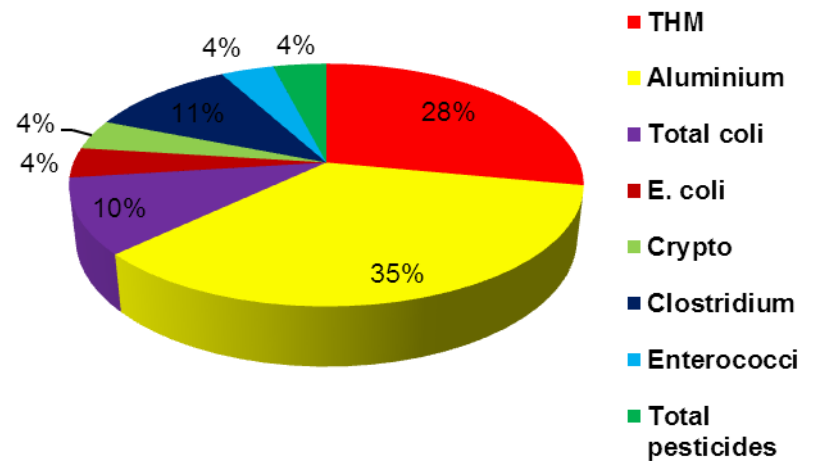
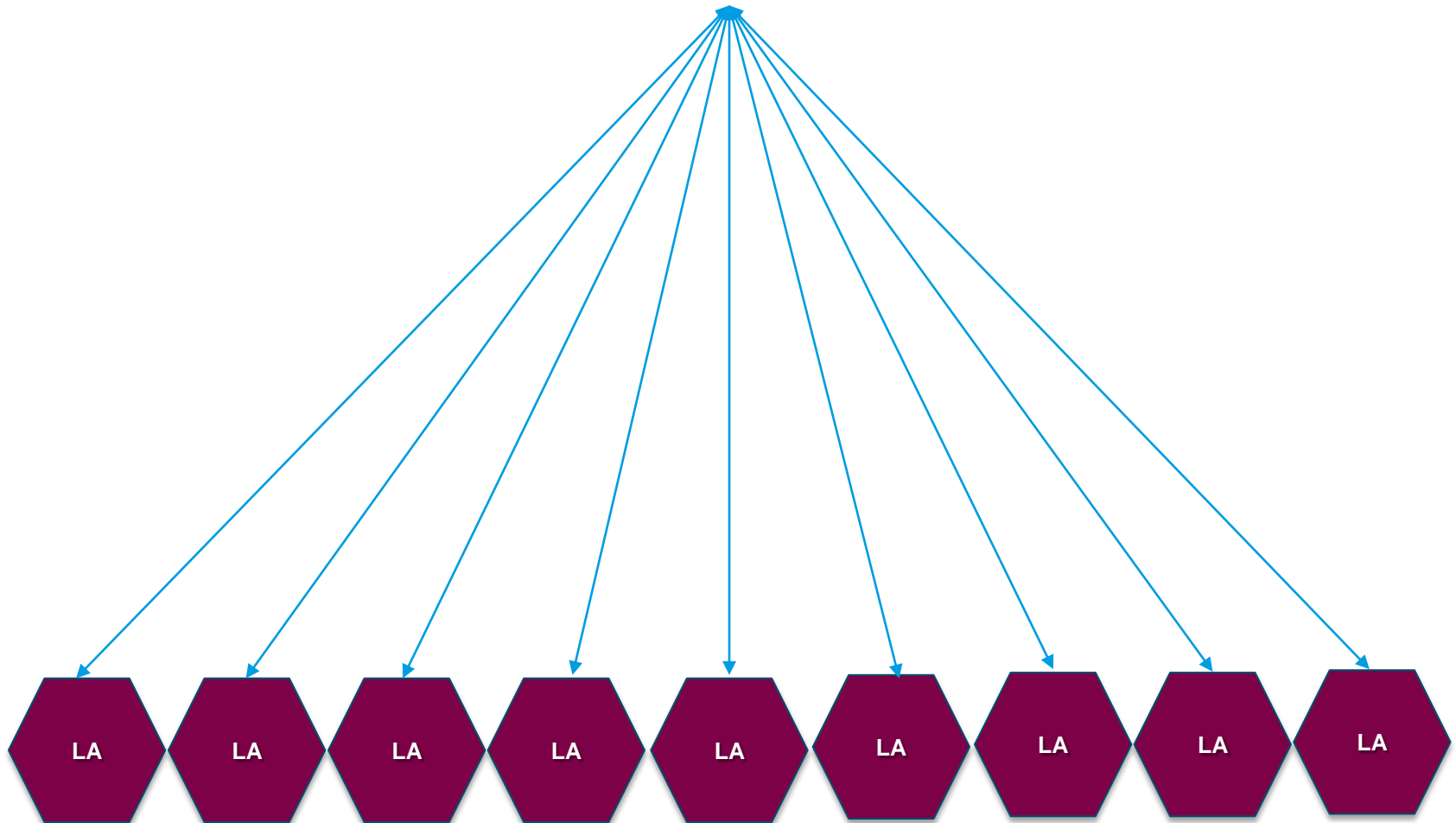


Figure 6: Main drinking water parameter exceedances.



Drinking Water Issues

- Drinking water monitoring programmes need to be re-evaluated
- Taking an incremental approach to Drinking Water Safety plans
 - *Very much integrated into our business systems*
 - *Will depend on WFD analysis for catchment side and implementation of suitable protection measures*





Analysing the problem

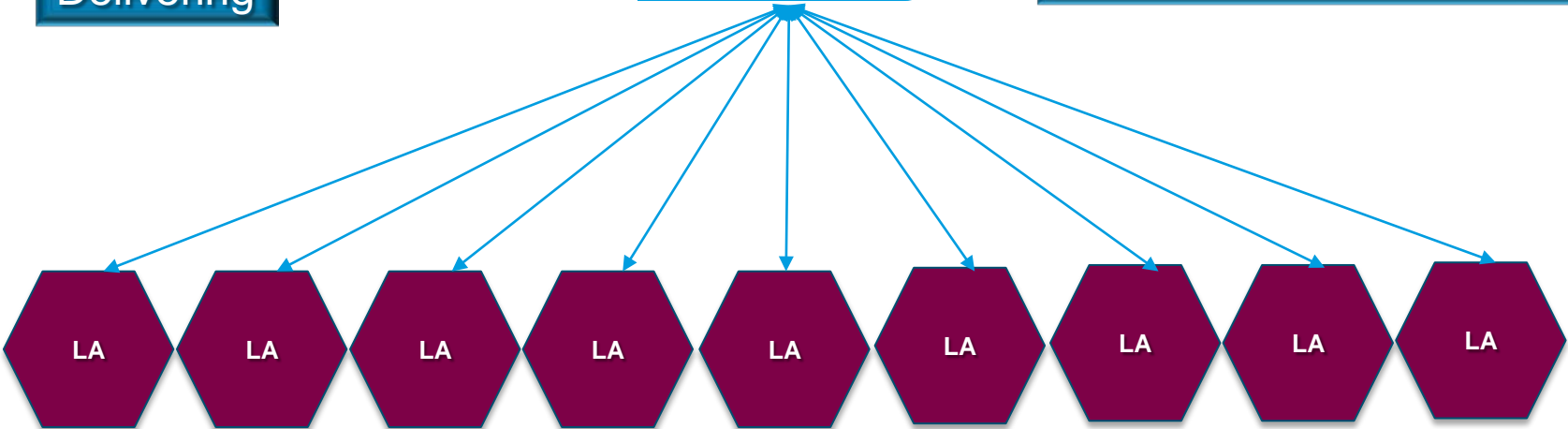
Finding the right solution

Delivering

Implementing Systems

Harmonising & Standardising

Better Information/Analysis



ECJ

- Significant data collection required to clarify situation
- Programmes of Improvement for non-compliant Agglomerations
- WWTP, Collection Systems, CSO's etc

	ECJ	Article 17
Article 3	12	12
Article 4	40	33
Article 5	32	8

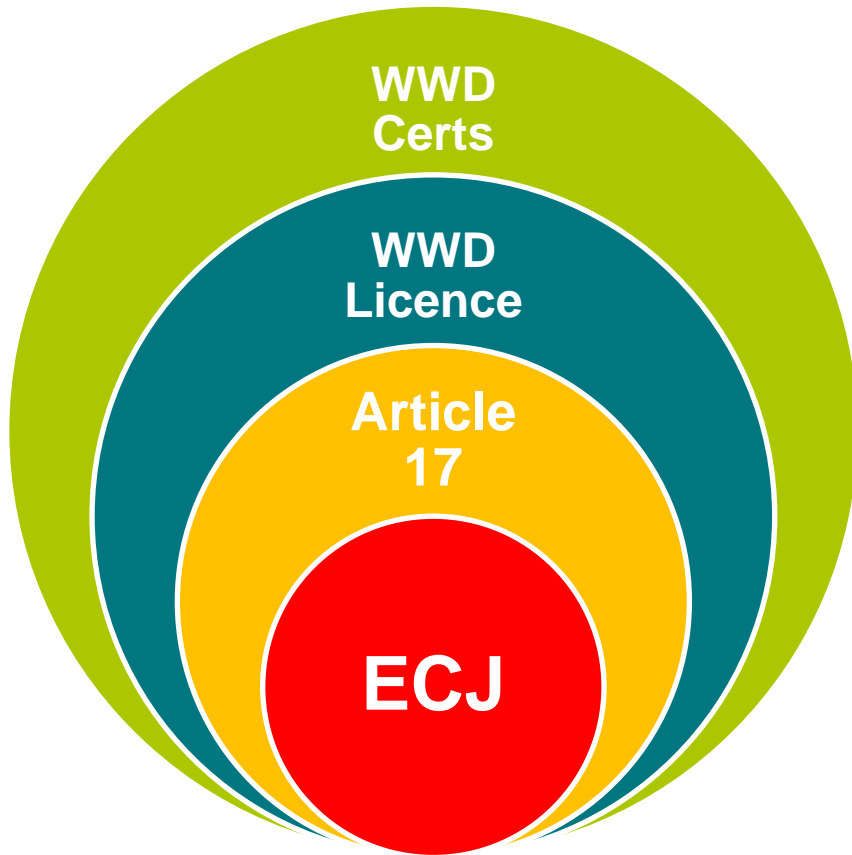
We acknowledge a significant deficit



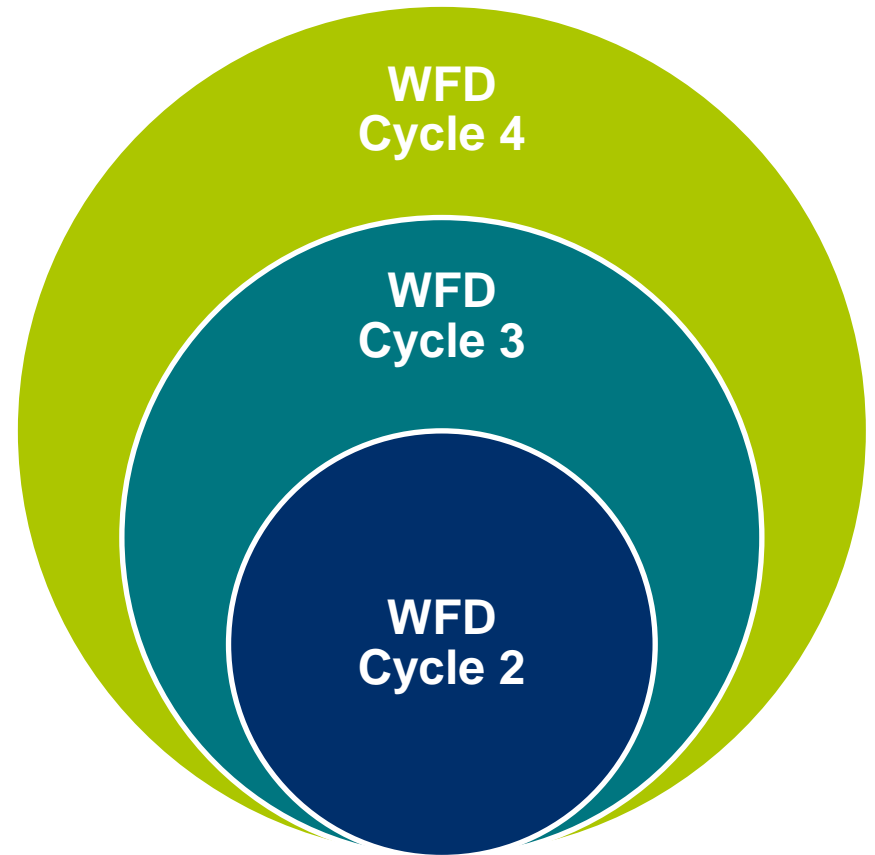
Court of Justice of the European Union

CVRIA

Where We Are



Where We Want To Be



Water Framework Directive

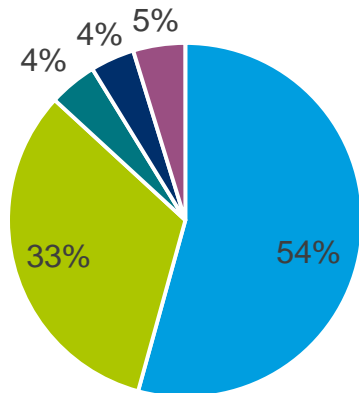
- Holistic integrated approach to Water Management
- Requires Irish Water to identify its significant pressures on the water environment
- Also requires that we identify significant pressures on drinking water resources and ensure they are protected
- There will be more measures required than we can afford to fund in the next cycle

Water Bodies Less than Good Status

	Rivers	Lakes	C&T	Ground
Moderate	435	69	62	
Poor	295	37	4	116
Bad	18	5		

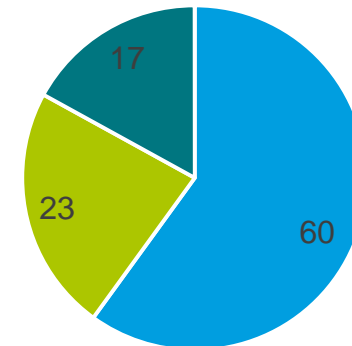
Total 1041

Suspected Causes of Pollution (547 Sites)



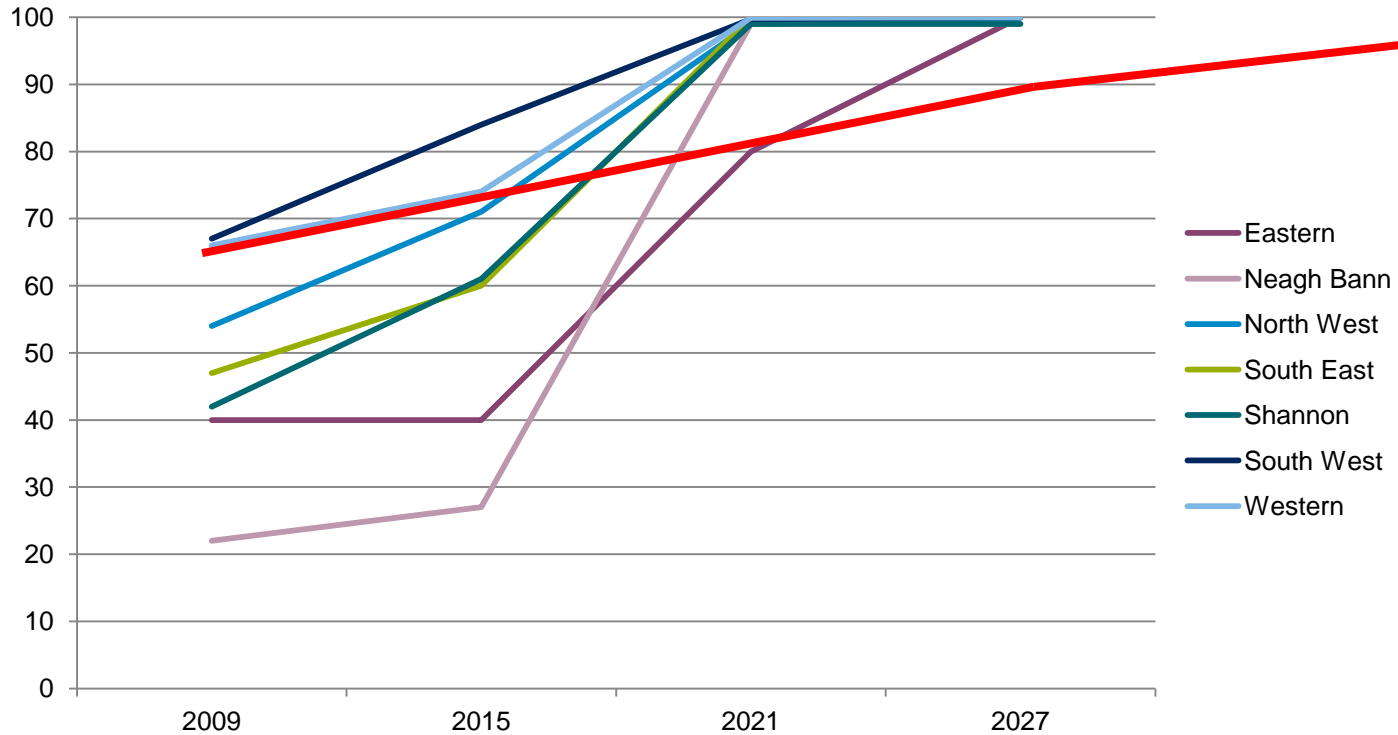
■ Agriculture ■ Municipal ■ Forestry ■ Industry ■ Other

P Contribution (%)



■ Agriculture ■ UWW ■ Other

The WFD Challenge



Water Quality Improvement Targets established during WFD First Cycle

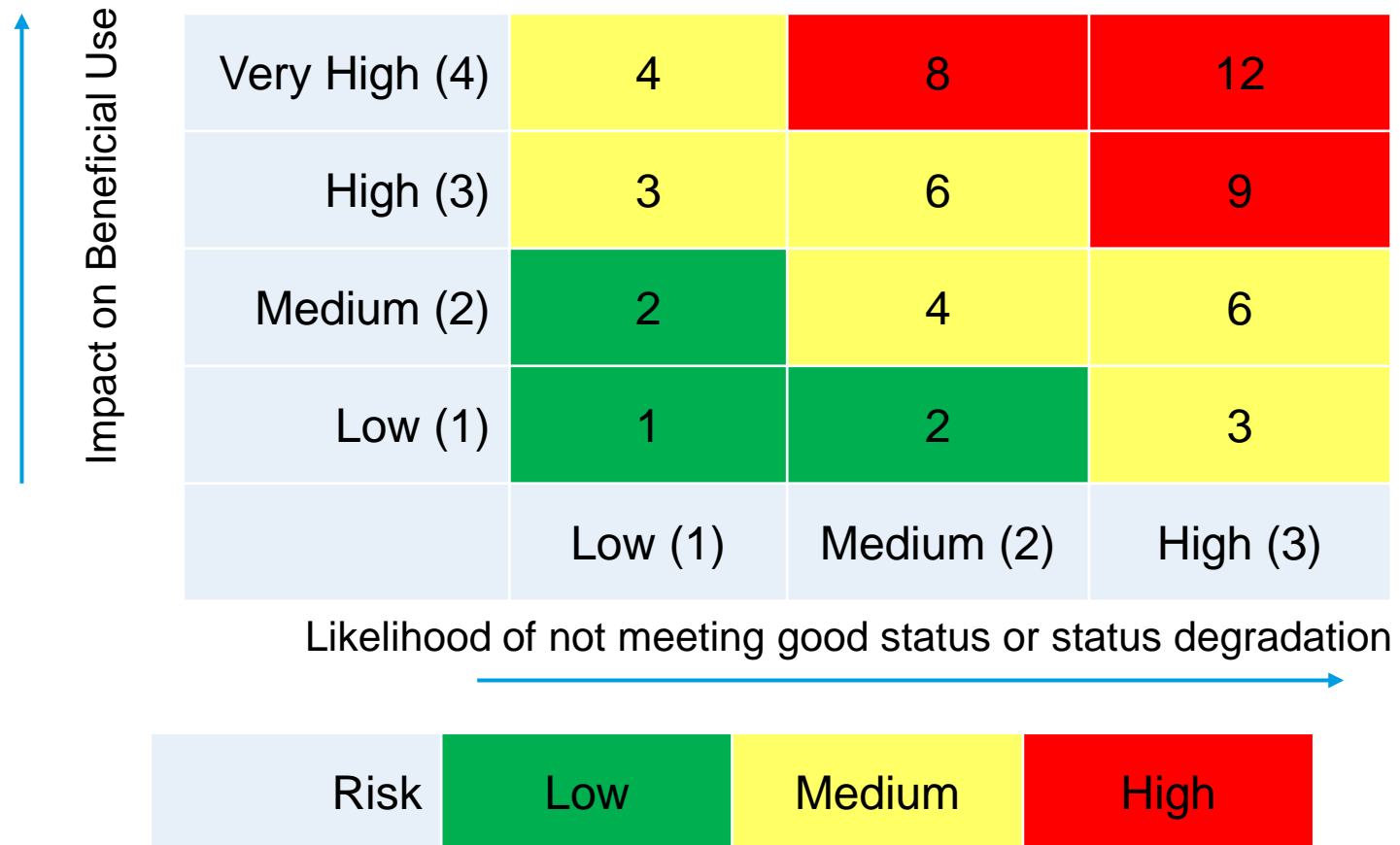
WFD Conundrum

- First round targets to achieve ‘good status’ were unrealistic
- These targets used to set Licence Compliance dates
- Licence Compliance requires capital investment
- Amount required not available within the timeframe of the plan

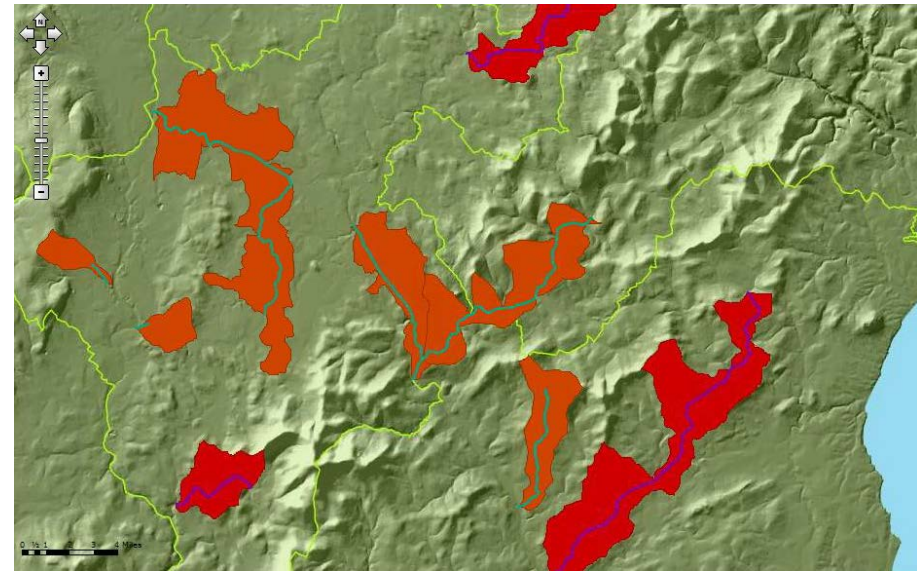
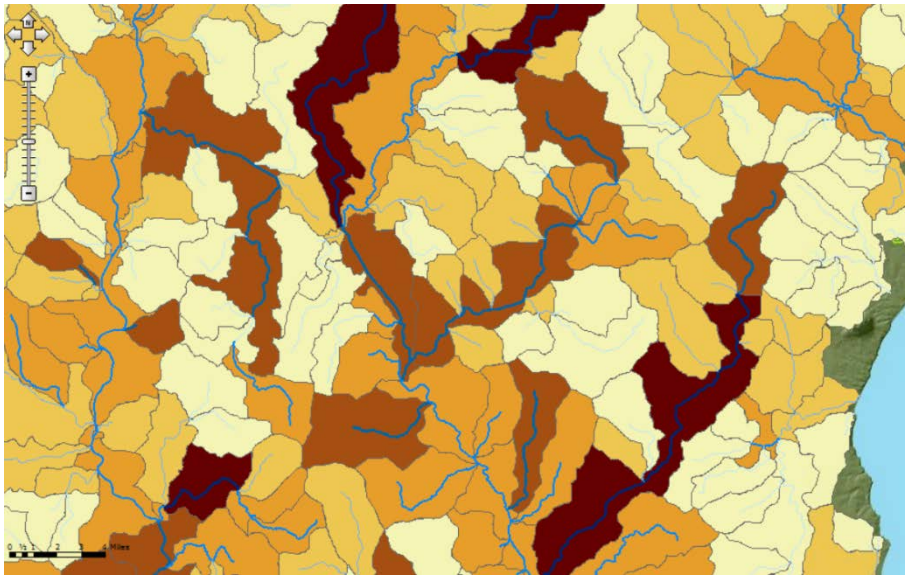
What we need

- Agreed approach for:
 - *Identification of pressure*
 - *Quantification of pressure*
 - *Assessing its impact*
 - *Assessing its relative contribution to the problem*
 - *Identifying appropriate measures*
 - *Prioritising investment in ‘key measures’*

Prioritisation Matrix

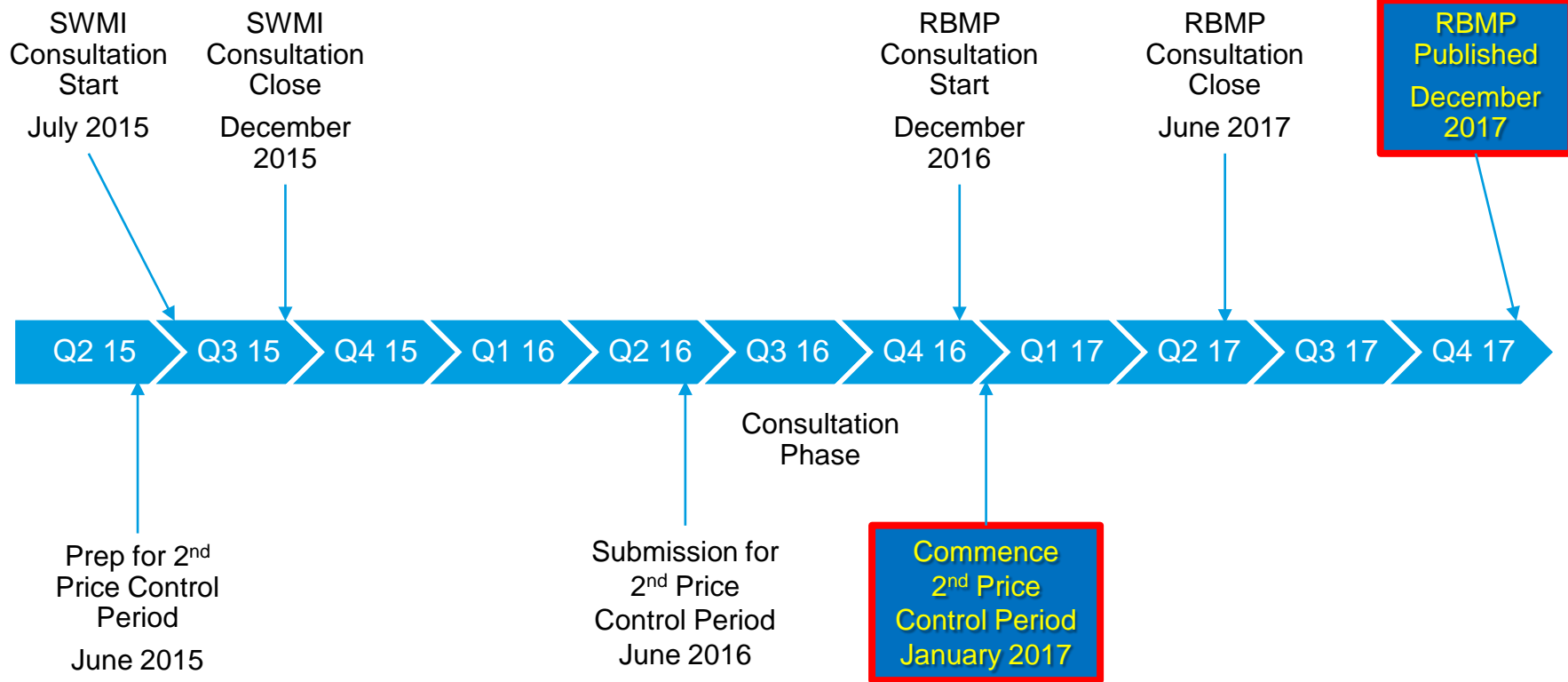


Need to Identify and Focus on Key Areas

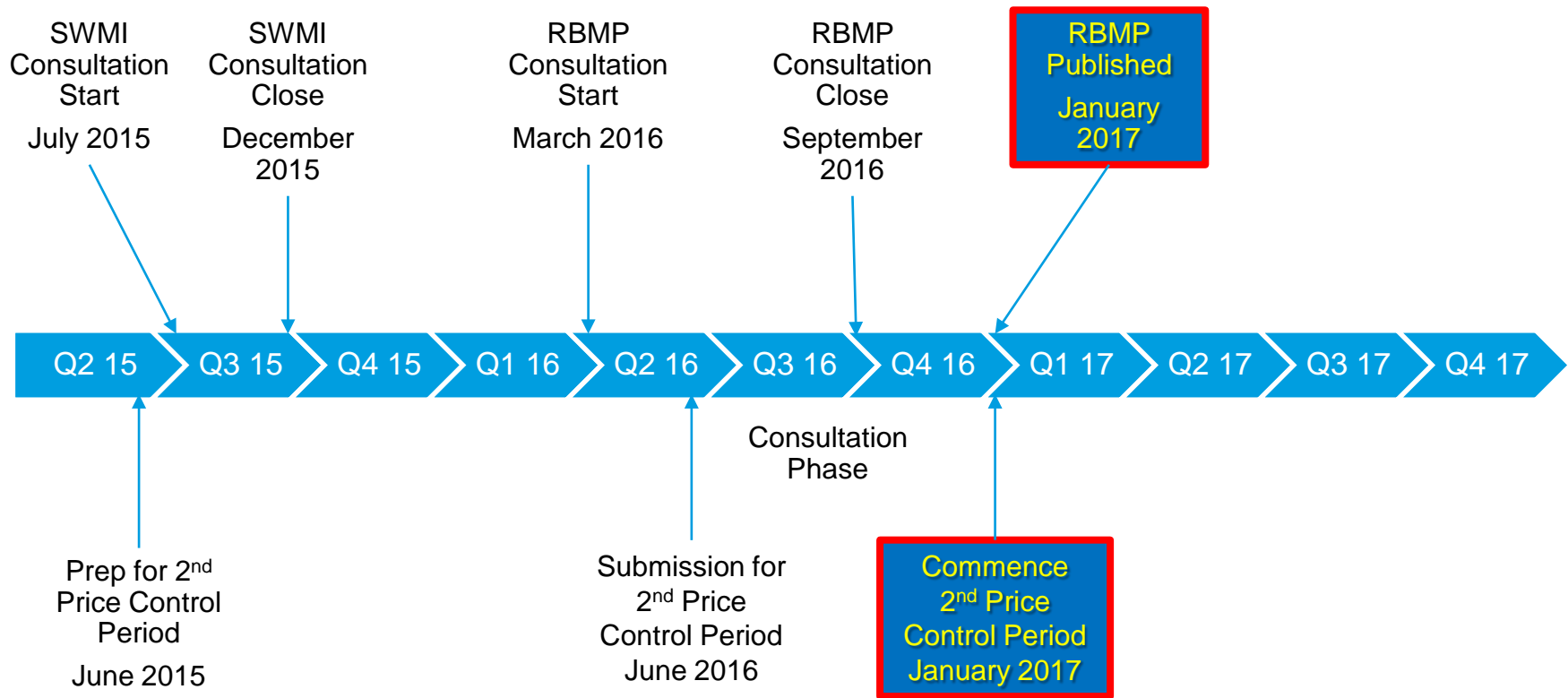


Very High High

Proposed WFD & Price Control Timelines



Proposed WFD & Price Control Timelines



Environmental Information Systems

- Need for good data – a common thread
- Cornerstone of good decision making
- High level analysis underway
- Some immediate work ongoing for compliance data
- Will work with all stakeholders to share information

Environmental Permitting Information & Compliance



EPA

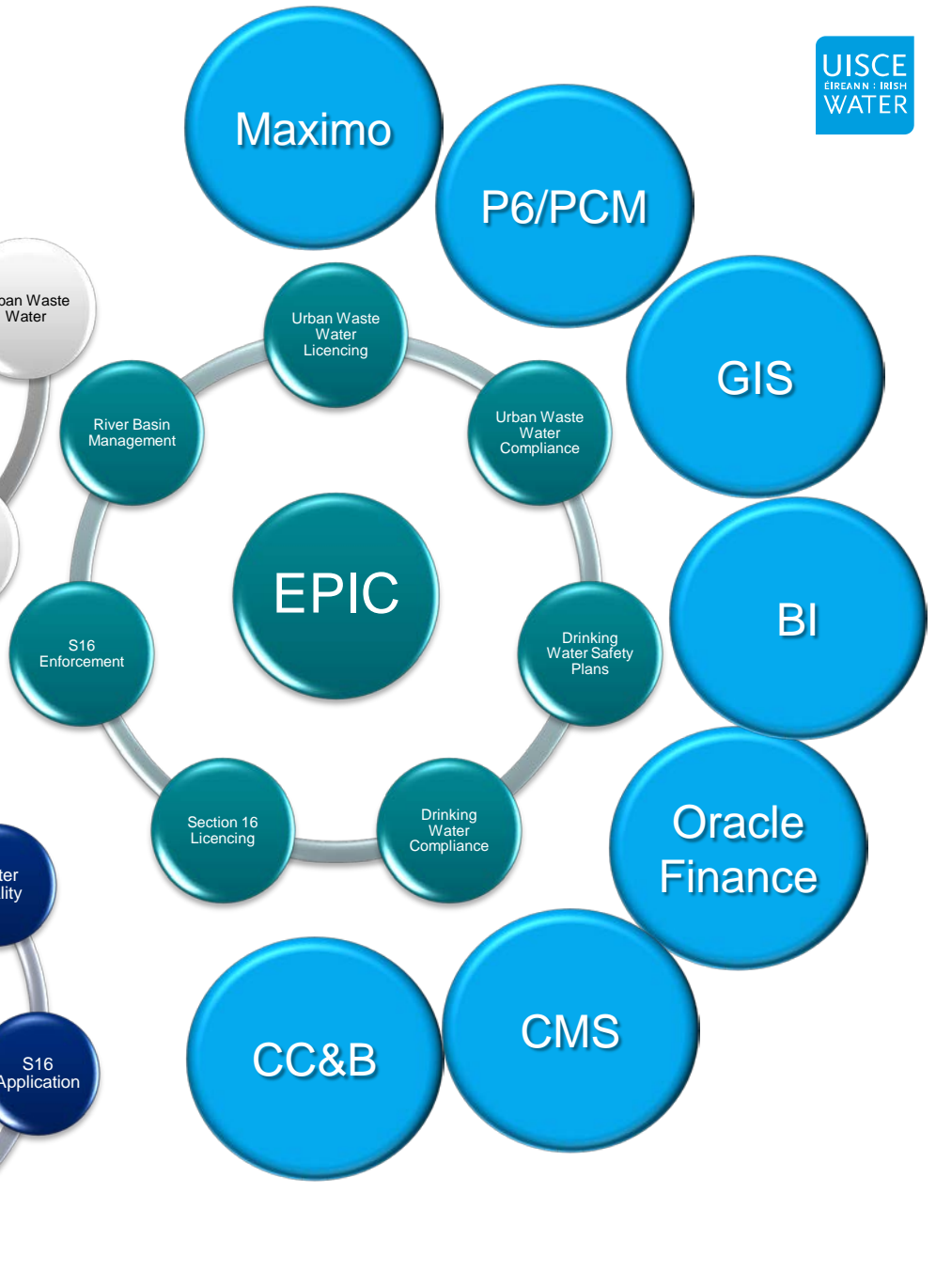
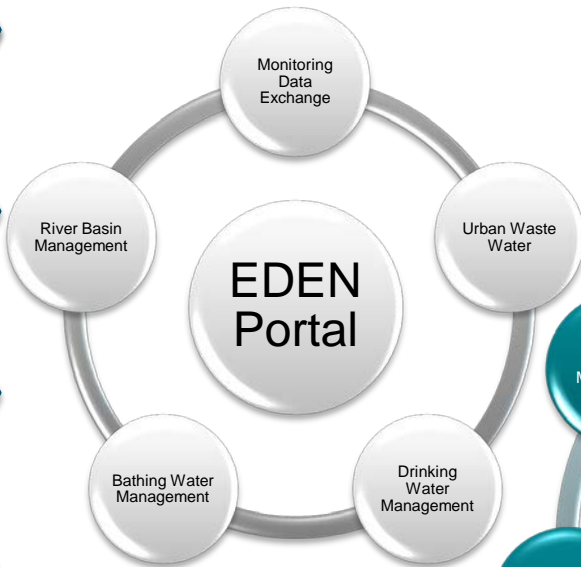
LA's

HSE

DECLG

Fisheries

Marine Institute

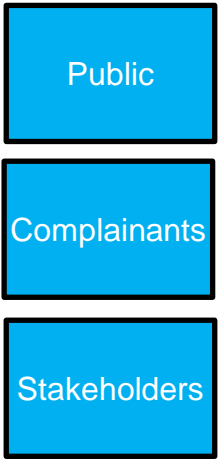
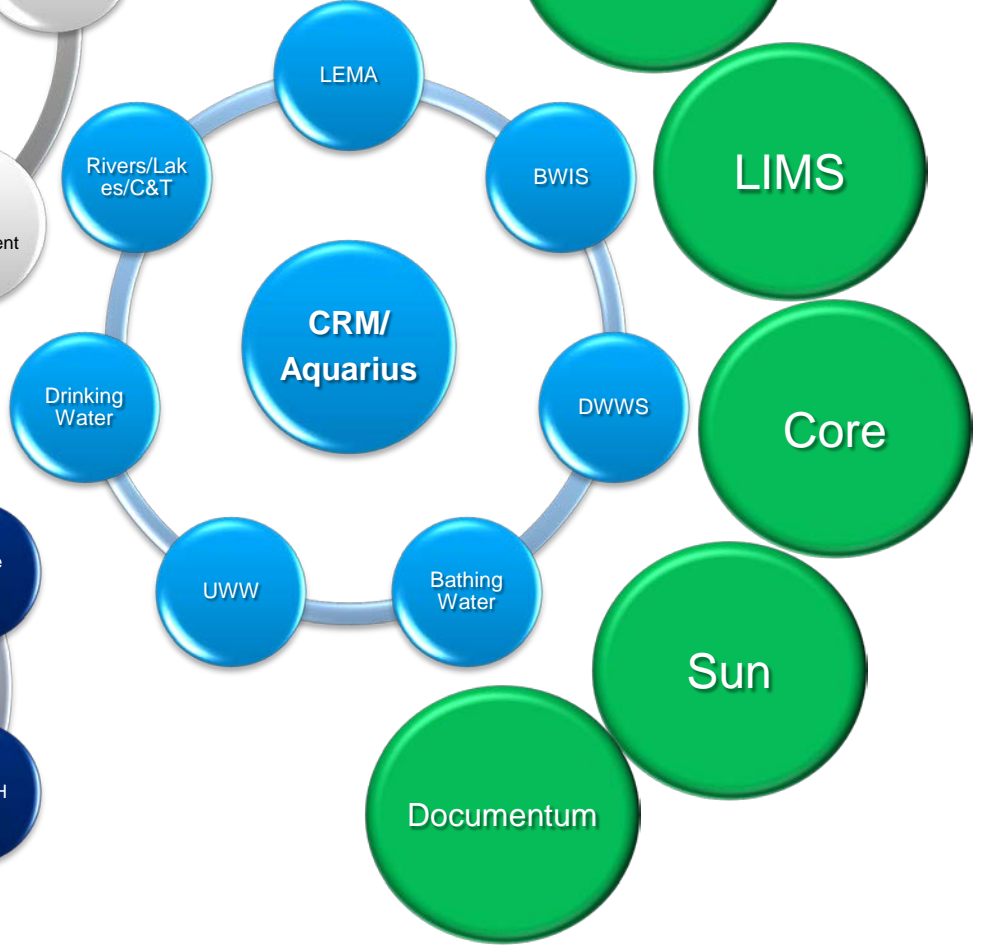
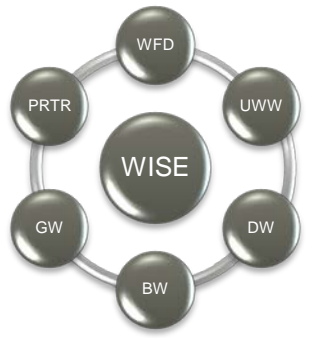
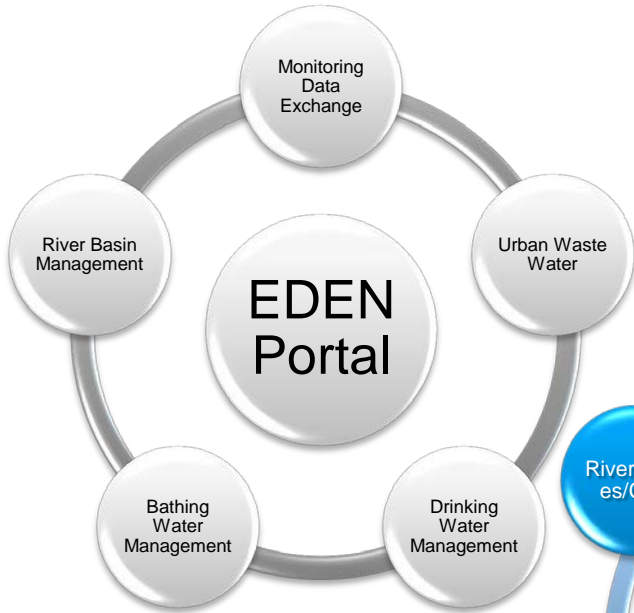
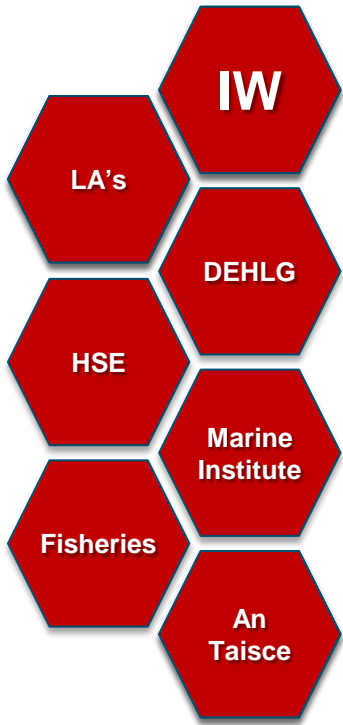


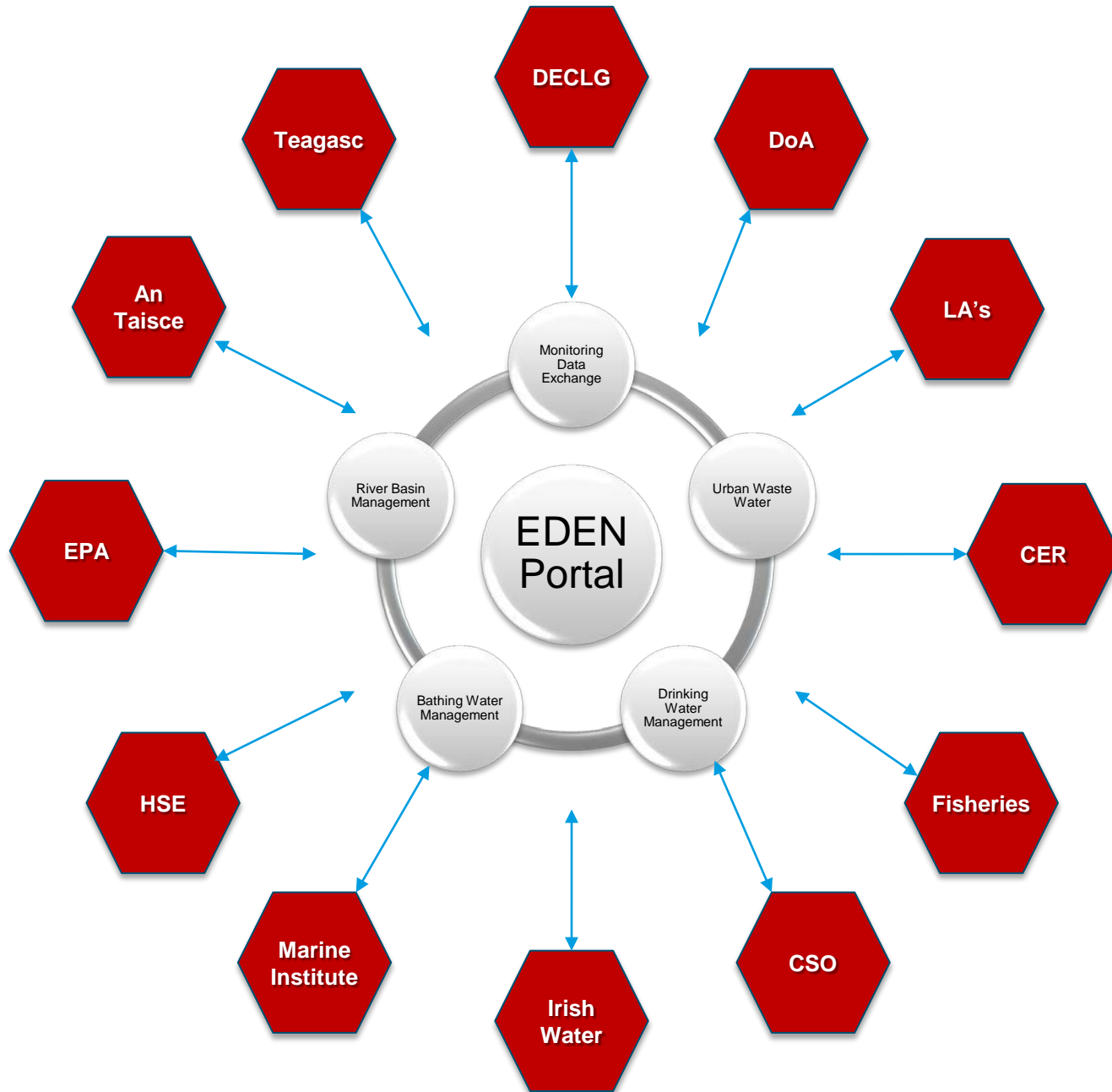
Public

Complainants

Stakeholders



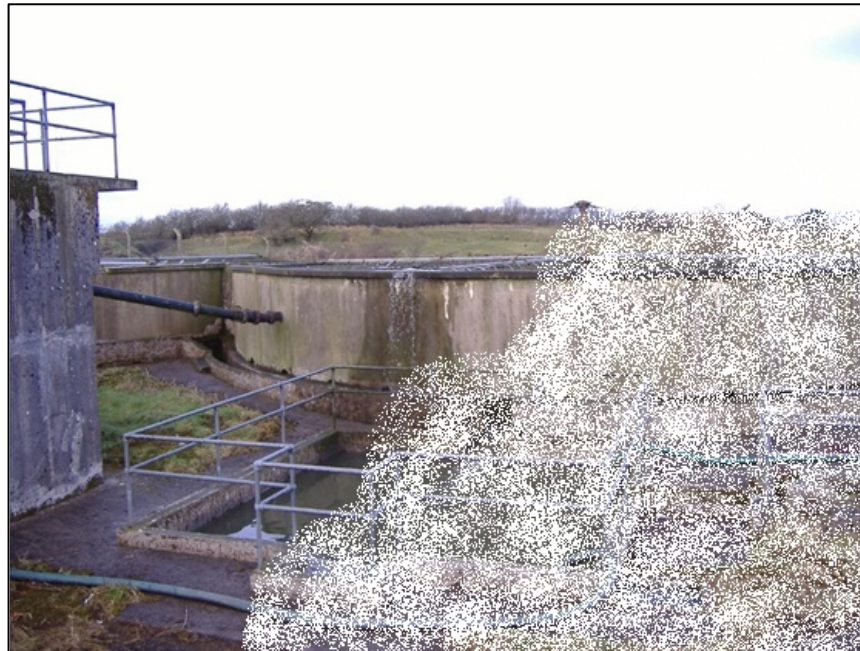
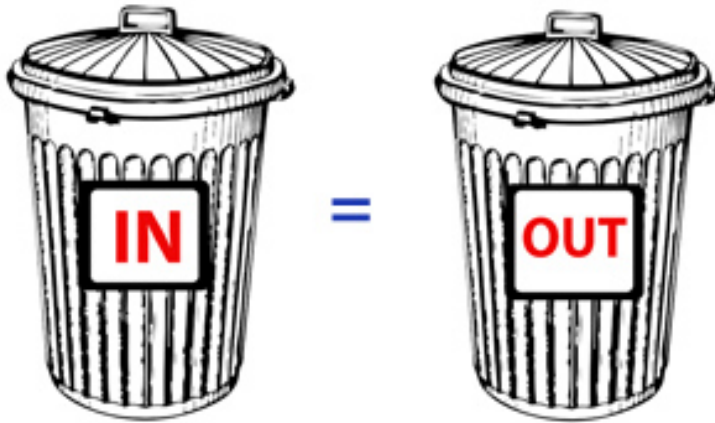




Environmental Regulation Objectives

- More extensive and robust monitoring programmes
 - *Statically sound with good spatial distribution*
- More comprehensive and extensive audit programme
- Improved network information
- Compliance metrics and accountability included in SLA

Reliable information is required!



Conclusion

- Good data is key
- Evidence based decision making required
- Must have an agreed prioritisation approach
- Challenging but realistic improvement plans