



National Federation of Group Water Schemes

Society Limited

24 Old Cross Square, Monaghan H18 NX30

Tel: 047 72766 Fax: 047 72788 Website: www.nfgws.ie

September 2019

Observations re Local Authority Climate Adaptation Plans

From our reading of the draft plan prepared by local authorities, we note the absence in most of any reference to the community-owned drinking water sector. While this is entirely understandable in those few local authority areas (in the Dublin region and large municipalities) that don't have group water schemes, it is difficult to understand in those local authorities where group water schemes provide potable supplies to as much as 60% of households.

We strongly recommend that these plans be revisited to make good this omission, particularly as:

- local authorities have statutory responsibility for overseeing the operation of the rural water sector and have a further responsibility to engage with – and offer assistance and advice to – individual community-owned water supplies within their jurisdiction.
- the GWS sector is generally organised through voluntary community effort and is, therefore technically ill-equipped to deal with climate emergencies without input from the respective local authority.
- local authorities have already completed Drinking Water Incident Response Plans (DWIRPs) in respect of drinking water supplies within their jurisdiction. In the context of the Climate Change emergency, these plans need to be re-evaluated and updated in consultation with group water schemes.
- prior to the formation of Irish Water, there was an effective working relationship between local authority caretaker staff and caretakers of group water schemes. Such a relationship no longer exists (given the SLA agreement with Irish Water) and so this 'unofficial' channel of support/advice is now closed to schemes. Local authorities, in consultation with Irish Water, where relevant and necessary, should put in place similar supports on an 'official' basis and include this service within their individual climate adaptation plans. At a minimum, plans should include the names and contact details of LA staff that have been

assigned responsibility for co-ordinating responses to climate emergencies, thereby providing climate-affected schemes with an immediate point of contact.

As the group water scheme sector is organised in federations on a county-by-county basis, consideration should be given to including representatives of each federation on the relevant climate change steering group/committee to ensure a free flow of relevant information and to assist with the ongoing review of climate action plans. As the representative body for the GWS sector, the NFGWS would be happy to sit on such groups/committees, if invited to do so.

At present, the GWS sector is focusing on protection strategies for drinking water sources. It is vitally important that these strategies are future proofed to take account of the potential impacts of climate change. For example, in flashy catchments where flooding is a consequence of persistent heavy rainfall, how high are these floods likely to rise in the event of greatly increased rainfall? Such future proofing will inform the positioning and the extent of fencing and buffer strips. We would refer local authorities to the [National Source Protection Pilot Project 2005-2010 final report](#) (pp39-40), where it is recommended that 'low flow and high flow (storm event) patterns should be taken into consideration when developing any source protection plan'. As a consequence of *not* doing this, a section of fencing erected to exclude animals from water courses was submerged in flood waters.

We would ask you to refer local authorities to the NFGWS [submission on the Department's Draft Adaptation Plan on Climate Change](#), as this provides a broad outline of how we envisage the GWS sector contributing to climate action. This is an early stage action plan and we fully expect that it will be amended and enhanced in the period ahead under my stewardship as Climate Action Officer. To this end, I would warmly appreciate any opportunity to work collaboratively with local authorities in the design and implementation of final climate change adaptation plans.

Finally, I would ask that you circulate this response to the local authorities within the area of your climate action office.

Yours sincerely,

Róisín Dowd Smith

Climate Action Officer

National Federation of Group Water Schemes