



National Federation of Group Water Schemes

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National Federation of Group Water Schemes submission to the Department of Housing Planning and Local Government on the timetable and work programme for the third cycle of the River Basin Management Plan 2022 - 2027

The National Federation of Group Water Schemes (NFGWS) is the representative organisation for the community-owned group water scheme (GWS) sector in Ireland. Since its establishment in 1997, the organisation has worked in partnership with government Departments, Local Authorities (LAs) and other statutory and non-statutory stakeholders to ensure that the services provided by our GWS members meet the highest standards in terms of water quality and customer service.

The NFGWS welcomes the opportunity to take part in this consultation process. The organisation has been actively involved in the implementation of the second River Basin Management Plan (RBMP) 2018 – 2021, being represented at all Regional Operational Committees and as a member of An Fóram Uisce.

The RBMP 2018 – 2021 refers to the source protection work being undertaken by the group water schemes sector on a phased basis, specifically the delineation of GWS drinking water source catchment and Zone of Contribution (ZOC) areas (phase I), which has been substantially progressed. The plan also referred to the second phase of source protection works, including the establishment of the Source Protection Pilot Project Phase II on 8 GWSs to develop a process for drinking water source protection planning for the sector. This pilot project is collaborative in nature, drawing on the expertise and active participation of statutory and non-statutory agencies but rooted in communities within the catchment. Through direct engagement with farmers, non-farming householders, businesses and schools, it aims to alter behaviour by building catchment awareness and actively encouraging individuals to contribute to protection of the source by adopting practical measures.

Plans are in preparation to roll out this strategy to all GWSs located in priority areas for action. **There is significant potential to build on the success of this project over the third cycle RBMP (2022 – 2027).**

The consultation document sets out a series of questions as follows which we have answered below.

1. Did you engage with the consultation processes during the first or second cycle RBMPs? If so, do you feel your queries or concerns were addressed in the final RBMP?

The NFGWS and individual schemes attended many of the meetings organised during the consultation process for the **first** RBMP and highlighted the need for protection of drinking water sources. We do not feel that our views were adequately addressed and, in addition, we felt that the potential for community participation in that plan was lost. This was a great disappointment and was a missed opportunity.

Our Federation made a submission on the Draft River Basin Management Plan (second cycle) in August 2017. Many of our Group Water scheme members and NFGWS development staff

also attended local consultation meetings organised by the Local Authority Waters and Communities Office (LAWCO), making both verbal and written contributions.

The final plan did address and clarify a number of queries and concerns highlighted in our submission which is to be welcomed. In particular, the plan's emphasis on community participation was very welcome. However, we feel there was significantly more potential to utilise the expertise of the GWS sector based on its ethos towards protecting and improving water quality, the accomplishments of the sector to date, the local, regional and National structures/networks established by the NFGWS, etc. There are significant opportunities to harness this potential in the next cycle which is outlined in this document.

Specifically, some items referenced in our submission that were not directly addressed in the final plan include:

- a greater emphasis on drinking water source protection throughout the plan,
- a requirement on local authorities to consider GWS drinking water catchments as part of the planning process,
- an increase in the number of septic tank inspections (within drinking water source catchments),
- financial incentives to encourage septic tank desludging
- the development of a National curriculum for primary and secondary schools on water,
- a National campaign about water and improving water quality,
- greater promotion and utilisation of citizen science,
- development and promotion of a preferred community structure for water catchments, e.g. rivers trust
- a specific funding programme for implementation measures, where existing funding is not available,
- a basic environmental awareness course for farmers
- greater support for farmers changing practices in critical source areas of drinking water catchments.

These issues should be positively considered when developing the third cycle RBMP.

2. Do you think the consultation timeframes and mechanisms outlined in this consultation document are sufficient? What other mechanisms would you suggest?

Yes, we believe that the timeframes and mechanisms set out in the consultation document are workable and achievable.

Public consultations at community level should include practical examples of success stories implemented during this cycle of the plan to demonstrate what can be achieved through participation, while creating awareness about the third cycle.

3. What are your views on the implementation structures outlined in the RBMP? Have you had any experience in dealing with any of the implementing bodies in connection with the RBMP, and if so, what was your experience?

Given that many of the structures are relatively new and have only been recently established, it is not possible to fully critique how effective they will be. The work achieved to establish the structures over a relatively short period of time must be acknowledged.

The NFGWS has been actively involved in the implementation of the current plan, being represented on each Regional Operational Committee and as a member of An Fóram Uisce. Both experiences have been positive to date, and it is clear the new structures provide for a

more targeted and collaborative approach towards implementing the programme of measures outlined in the plan. The following are some observations to date:

An Fóram Uisce:

- Excellent at facilitating debate on water-related issues despite the challenges given the range of views from stakeholders.
- Considering the time and commitment stakeholders are providing to An Fóram, it is important that views expressed through consultation documents and otherwise are taken on board by the State bodies with which it interacts and within the implementation structures for the RBMP (WPAC & the NCMC). Otherwise it will be difficult to maintain effective participation of members.

At local level:

- There are some excellent examples of where the new local authority structures have worked closely with community structures (such as GWSs) to promote and assist with the implementation of the plan and establish and promote co-benefits. This model should be further promoted with a greater emphasis placed on this work.

Other:

- A review should be completed before the next plan is complete on the effectiveness of the implementation structures at each level in advance of the next cycle.
- Bottom up organisations (such as the NFGWS) should be researched to develop a model suitable to represent and articulate the interests of communities and their water catchments at local, regional and National level.

4. What are your views on the prioritisation of Areas for Action in the RBMP?

Prioritising areas for action certainly helped target resources and measures in specific areas. However, it is important that areas outside of these are not overlooked, particularly those with significant/emerging issues, or where communities require support to take action to protect water resources.

5. Are there areas where you feel we should direct additional effort, outside of the Areas for Action and the measures identified in the RBMP?

It is our view that the areas for action should be expanded in the next cycle to include all delineated drinking water catchment areas and Zones of Contribution (ZOC). Public health should always be a priority and for drinking water supplies the first line of defence, in a multi-barrier approach to achieving quality drinking water, is source protection.

This is recognised by the Department of Housing Planning and Local Government with the launch earlier this year of the Multi Annual Rural Water Programme 2019 - 2021, listing source protection as a priority measure under the programme. Significant resources have been provided through this programme to delineate GWS catchment and ZOC areas. Through the NFGWS Source Protection Pilot Project Phase II, a process for the development of drinking water source protection plans is almost completed and this will be rolled out nationally over the coming years. Generous financial incentives to aimed at developing and implementing these source protection measures and actions should be to the forefront of prioritised in the next RBMP.

The phase II project has demonstrated how all relevant stakeholders (State and non-State, national and local) can work in partnership to ensure practical, targeted measures and actions are developed and implemented in catchment specific source protection plans. The

implementation of these plans involves the active participation of communities, led and supported by their local GWS.

One of the objectives of the RBMP is to create public awareness about the importance of protecting and improving our water resources. Including GWS drinking water catchments as priority areas offers real opportunities to work directly with communities that have a trusted local structure in place that has a vested interest in protecting water quality. Existing GWS structures can assist in promoting a more widespread participation of water appreciation, acting as leaders, promoting best practice and encouraging those less willing to participate in implementing measures.

6. Have you any additional comments on the consultation steps and timetable set out in this document?

Given the recent emergency declared by the government on climate change and biodiversity, opportunities to address these issues should be considered in the next RBMP. The recent public demonstrations by school children in many countries, has helped in no small way to highlight the urgency of these issues and we believe there is now a real appetite for positive behavioural change and actions in these two vital areas. The NFGWS has already established, through its specific education programme for schools, an excellent model of engagement with schools and we strongly believe that this is the best vehicle to raise awareness of climate change and biodiversity with the specific objective of engaging the wider community and rural dwellers in developing and implementing their own local plans.

Through the implementation of drinking water source protection measures and better management of our water resources, there are opportunities for co-benefits when implementing specific measures and actions. Such measures need to be prioritised and financially incentivised in the next plan.

Table 1 in the consultation document lists the National Plans and Programmes linked to the RBMP. Given the links between source protection and the pivotal role rural communities can play in implementing the RBMP, we feel the Multi-annual Rural Water Programme should also be listed here.

The GWS sector is in a unique position to not only promote public awareness of drinking water catchments/ZOC areas but also to sustain ongoing interest and actions aimed at improving overall water quality, creating awareness about climate change and encouraging biodiversity generally in rural Ireland. We believe that the GWS sector can make a major contribution in achieving the aims of the next RBMP and the NFGWS is prepared to assist in every way possible.

We hope that the comments and suggestions contained in this submission will be positively considered as part of the review process. Should you require any, or further information, please contact us.

Barry Deane
CEO NFGWS