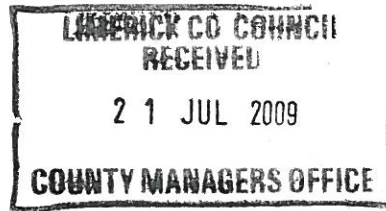




Comhshaol, Oidhreachta agus Rialtas Áitiúil
Environment, Heritage and Local Government

Intranet
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Circular L 6 /09

17 July, 2009.

Water Services Investment Programme 2010 - 2012
Needs Assessment 2009

A chara

Background

1. The high level goal of the Water Services Investment Programme (WSIP) is to ensure that the timing and scale of water services investment facilitates economic and other development, compliance with statutory requirements for drinking water and wastewater treatment and the achievement of environmental sustainability objectives. In recent years, a multi-annual approach to investment has been adopted to aid the proper planning and delivery of required infrastructure to meet these goals. The current programme covers the period 2007 – 2009 and the Department has commenced work on the development of the Water Services Investment Programme (WSIP) 2010-2012.
2. With the changed economic climate and the finalisation of the first cycle of River Basin Management Plans by local authorities in October, the new programme must prioritise projects that target environmental compliance issues. It must also fully support economic and employment growth as envisaged in the Government's policy document '*Building Ireland's Smart Economy – A Framework for Sustainable Economic Revival*' and offer best value for money. There is a need also to take into account relevant reports such as the EPA Reports on drinking water and wastewater discharges, the 2008 Forfas Report – *Assessment of Water and Wastewater Services for Enterprise* - which recommended prioritisation of investment for key centres which are likely to require additional water and wastewater treatment capacity in the coming years - and the economic development in gateways and hubs (and in specific developing areas in these locations) in accordance with the National Spatial Strategy. The Needs Assessment undertaken by Water Services Authorities will be a critical input to the development of the new programme. Following from discussions with the City and County Managers Association (CCMA) some changes have been



agreed to the Needs Assessment Process to ensure the project selection is aligned with overall programme priorities.

3. Water services authorities are now required to undertake a Needs Assessment, as set out in this Circular, and to submit the completed assessment to the Department by **23 October 2009**.

WSIP 2010 – 2012 – Changes in approach

4. The modifications to the Needs Assessment process are intended to ensure that the process results in a programme which is realistic in its level of ambition, in terms of the affordability and deliverability of works included and that investment is focussed on key priorities. A key change in the approach to the Needs Assessment for the WSIP 2010-2012, is the requirement to review existing schemes which have not sufficiently advanced under earlier programmes to ensure that they:

- have continuing relevance in light of the programme priorities;
- reflect an appropriate scale of works in light of these priorities and timescale for delivery;
- are appropriately phased;
- are affordable and offer value for money; and
- are the most cost effective solution to addressing the problem.

Planning Stage

5. The focus in previous Programmes had been on water services **schemes** to meet identified environmental or economic need. This approach will continue, in the normal course, up to the approval of the Preliminary Report (PR). The costs incurred at this early planning stage of a **scheme** (as reflected in the Planning Stage Budget – Appendix 3 of Procedures attached to Circular L 5/09) will continue to be funded and administered by the Department as heretofore. **Schemes** to be included in the programme for planning stage during 2010-2012 would have a longer time horizon in terms of implementation. In this circular a reference to **schemes** means the entire set of contract and non-contract expenditure relating to the project as a whole or, in the case of larger projects, relating to that particular phase of the project.

Construction Stage

6. Post-planning, a more focussed approach that centres on **contracts** rather than **schemes** will apply. In this circular, a reference to **contracts** means Substantial Advance, Treatment Plant Civil, Treatment Plant M&E, Treatment Plant DBO

[Civil and M&E], Network Civil, Network M&E or Pumping Contracts, where separate, but not investigation contracts, survey contracts or miscellaneous consultancy contracts.

7. The new focus on **contracts** reflects the fact that **schemes** at this later stage are generally made up of many substantial **contracts**, some of which are more urgently required than others. The WSIP 2010 – 2012, therefore, will show **contracts** in progress and those scheduled to go to construction over the next 2/3 years, including the estimated cost of those **contracts**, with a list of **schemes** at the planning stage. This will allow for the phasing of a scheme, so that priority **contracts** can be advanced at an early stage.

Water Conservation

8. A further key change in the approach to the 2009 Needs Assessment, will be the integration of water conservation more fully into the programme. The WSIP 2010 – 2012 will include water conservation **contracts** in progress and those scheduled to go to construction over the next 2/3 years, including the estimated cost of those **contracts** and a list of water conservation **schemes** (identifying whether Stage 1,2 or 3 works, as per Circular L6/07). This integrated approach may mean for example, that a contract to deal with a water supply issue on the EPA remedial action list might be priority 1 for an authority, while the issues relating to increasing capacity of that supply might be accorded a lower priority, having regard to water conservation measures to be progressed in the interim. A proportion of funds available annually will be assigned specifically to water conservation works.

Serviced Land Initiative

9. The WSIP 2010 – 2012 will not reflect ongoing work on the completion of schemes under the Serviced Land Initiative (SLI), although their completion will continue to be funded as set out in Circular L 3/09.

Rural Towns and Villages Initiative

10. The specific sub-category of WSIP schemes 'Rural Towns and Villages Schemes' will no longer be highlighted in the WSIP 2010 – 2012 but will be dealt with in the same way as other WSIP schemes/contracts.

Annual Programme Reviews

11. While it is important to maintain the multi-annual focus of the programme, it is also important that the investment programme is responsive to emerging needs. Consequently, the Needs Assessment will be supplemented by Annual

Programme Reviews which will be less formal in nature but will allow for the updating of the priorities in the light of progress and emerging issues.

Programme priorities

12. In line with the goals set out in paragraphs 1 and 2, the specific environmental and economic pressures that have emerged in recent years and which will form the basis for developing the WSIP 2010 – 2012 and subsequent programmes are:

- Water conservation proposals which meet environmental and economic goals.
- Environmental objectives – works required to respond to:
 - ECJ judgments,
 - Environment/Public Health Objectives (eg arising from Regulations and EPA Reports dealing with drinking water standards, wastewater treatment standards, authorisation of wastewater discharges, bathing water standards etc), and
 - Compliance with the Water Framework Directive requirements.
- Economic objectives:
 - Works to support the overall strategic and sustainable development of hubs and gateways under the NSS as well as strategically located developing areas under the developing areas initiative, and
 - Works to support employment creation (in line with objectives in *'Building Ireland's Smart Economy – A Framework for Sustainable Economic Revival'*).

13. In identifying **schemes** and **contracts** which are aligned with these objectives and which are priorities for advancement over the period 2010-2012, water services authorities should adopt a risk based approach which identifies, in particular, public health, environmental and statutory compliance risk associated with investment requirements. Work being developed in parallel on River Basin Management Plans must also be central in identifying priorities from a regional perspective.

General requirements in relation to Needs Assessment 2009:

14. The purpose of the assessment is to develop an overall strategic investment plan for the medium term to meet identified water services needs, which will then be reflected in the WSIP 2010 – 2012. Therefore, the Needs Assessment returned to the Department should comprise a short overview setting out the strategic

context and lists of prioritised works in different categories. The following general provisions will apply:

Strategic Context:

15. Water services authorities should provide a 'Strategic Overview Statement' as a preface to the more detailed sections of the Needs Assessment, where prioritised works will be listed. This strategic overview should be based on readily available data identifying, for example, proven demand for future capacity and take into account performance on compliance with water quality and waste water standards and leakage. The overview should reflect emerging priorities under the River Basin Management Plans and regional strategic priorities as appropriate. The preparation of the strategic overview will aid the overall identification of infrastructural gaps and emerging issues which would then underpin the identification of priority works. It will also allow for the integration of water conservation and major schemes investment from a strategic perspective.

Lists of Prioritised Works:

16. In line with the programme priorities set out in paragraph 14, four broad categories of need, as detailed in this section, have been drawn up and authorities will be required to prepare separate lists for each category. The categories for which separate lists are required are:-

Category 1: Water conservation proposals which meet environmental and economic goals.

Category 2: Works required to respond to ECJ judgments.

Category 3: Environment/Public Health Objectives (eg arising from compliance with Water Framework Directive requirements, Regulations and EPA Reports dealing with drinking water standards, wastewater treatment standards, authorisation of wastewater discharges, bathing water standards etc).

Category 4: Works to support sustainable development of hubs and gateways under the NSS, strategic developing areas and works to support employment creation.

It should be noted that **contracts/schemes** may not in some cases be exclusive to one category only. Where an authority feels that a **contract/scheme** should be entered in different categories, this is acceptable but appropriate cross-

referencing to its appearance in other categories should be highlighted for ease of administration. In drawing up their lists in each category, authorities are asked to take into consideration the specific criteria set out in Appendix 1.

Information Requirements:

17. For each of the aforementioned categories, authorities are asked to list:
 - **contracts** (see paragraph 8) currently at construction,
 - a prioritised list of **contracts** that they wish to advance to construction over the period 2010 - 2012 and
 - a prioritised list of **schemes** (this list can include, for example, new schemes and remaining contracts of schemes not covered by the first two bullets above) for inclusion/retention in the Programme at planning stage.

18. In each category, priorities should be indicated on a county-at-large basis and should consist of one list of prioritised **contracts/schemes**, covering both water and wastewater works (ie separate lists in each category of prioritised water and prioritised wastewater works will not be acceptable). Information should also be provided in each case as to when **contracts** might be able to start over the period 2010 – 2012.

19. Where there are a considerable number of **contracts/schemes** in each category, the water service authority will be expected to separately delineate proposals, within each category, into those which are a priority for advancement over the coming three years, and those which they would wish to advance when the first group are completed.

20. With the exception of water conservation works, authorities are also reminded that **schemes** with a total estimated cost of less than €1 million are more appropriate to schemes under the Rural Water Programme and should not, therefore, be included in the Needs Assessment. Specific funding within the Rural Water Programme will continue to be available to assist in meeting the costs of immediately required and relatively inexpensive works to address water supply problems identified by the EPA in its annual Drinking Water Reports.

21. Authorities are asked to provide the following information in relation to each **scheme/contract** on the list in each category:
 - (a) submission of the list of water conservation works in Category 1 is to be accompanied by the completed template report attached at Appendix 2, which

elicits information on the water conservation works undertaken to date (Phases 1, 2 and 3 works) and sets out a standardised basis to assist authorities in deciding on the **contracts** to be recommended for advancement over the period 2010 – 2012 and other water conservation **schemes** proposed for the period following that.

(b) In relation to **contracts/schemes** in Categories 2 to 4

- The name of the **scheme**.
- The title of **contract**.
- The total estimated cost of the **scheme** and **contract**.
- The timeframe for delivery.

(c) For each entry on the list in Category 3, a short explanation should be provided justifying the priority assigned, identifying the relevant statutory requirement, the severity of the breach of the statutory requirement involved and reference to relevant EPA Reports. In the case of wastewater proposals, the inadequacy of collection systems and the links, where appropriate, to sludge treatment/re-use in accordance with the Sludge Management Plan should be provided as well as the Q value (Q1 – Q4) of the receiving waters. In the case of water supply proposals, the scale of the current and prospective supply deficiency should be outlined.

(d) For each entry on the list in Category 4, a short explanation should be provided justifying the priority assigned in the context of the National Spatial Strategy, the Developing Areas Initiative, any other major development proposals, impact on moderate development proposals and the creation of reserve capacity

Existing Schemes in the WSIP 2007- 2009

22. **Schemes** currently in the WSIP 2007 – 2009, whose Preliminary Report (PR) has not yet been approved by the Department at the date of issue of this Circular will not be automatically included in the next WSIP. These **schemes** should be considered in conjunction with all others not yet on the Programme in the context of the new Needs Assessment. The following will apply where some element of the scheme has already been approved by the Department:

- Where the Department has not approved a PR for a **scheme** but has already approved the progression of a substantial advance works **contract** of the **scheme**, that **contract** should be shown among those in progress or to start over the period 2010 – 2012, as appropriate, but the remaining

contracts of the **scheme** will not be automatically included in the next WSIP and should be considered along with all other potential **contracts/schemes** as part of the Needs Assessment. Some of the remaining **contracts** may be prioritised as **contracts** for progression to the construction stage and others may be prioritised to remain at the planning stage as a remainder of a **scheme** pending the next review.

- Where the Department has approved a PR for a **scheme** in the previous two years from the date of issue of this Circular and no substantial **contract** (see paragraph 8) within the **scheme** has since advanced to advertisement of tenders, the **scheme** will not be automatically included in the next WSIP. These **schemes** should be considered in conjunction with all others not yet on the Programme in the context of the new Needs Assessment.
- Where the Department has approved a PR for a **scheme** and at least one substantial **contract** of the **scheme** has been completed or is in progress, the remaining **contracts** will not be automatically included in the next WSIP and should be considered along with all other potential **contracts/schemes** as part of the Needs Assessment/Annual Review. Some of the remaining **contracts** may be prioritised as **contracts** for progression to the construction stage and others may be prioritised to remain at the planning stage as a remainder of a **scheme** pending the next review.
- Existing **schemes** currently being funded by the Department on foot of approved Planning Stage Budgets that are not prioritised to progress over the 2010 – 2012 period will be funded by the Department up to the completion of the Needs Assessment process on 23 October 2009. Revised Planning Stage budgets will be agreed for these cases as they arise.

Affordability:

23. In undertaking Needs Assessments authorities should be satisfied that the prioritised proposals represent good value for money, and take account of the implications for the authority itself in each case under Water Services Pricing Policy. Under Water Services Pricing Policy, services for future development, including new residential development, are regarded as non-domestic and the associated marginal capital costs are not funded by the Department. In drawing up proposals water services authorities should, therefore, concentrate on providing

infrastructure to serve the core areas of towns and villages. More outlying areas may, more appropriately, be dealt with under the Small Schemes Measure of the Rural Water Programme. In particular, authorities should consider the following:

- **Water supply investment proposals:** Affordability and value for money issues concerning proposals to increase water supply capacity should focus on the most cost effective solution having regard to the role which water conservation measures may play in the first instance.
- **Waste Water investment proposals:** In relation to value for money, the cost of proprietary single house sewage treatment systems are useful guides to determining the cost effectiveness of proposals to serve existing individual houses by way of new public wastewater infrastructure.

Administrative Areas:

24. The Needs Assessment should be carried out by City Councils and County Councils only. County Councils should incorporate the requirements of Borough and Town Councils as an integral part of the assessment for the county. All Needs Assessments should take account of the scope for regional solutions where appropriate with adjacent authorities, particularly in light of the River Basin Management Plan process. A lead authority may undertake the Needs Assessment, in agreement with the other authorities concerned, in relation to a region. In such cases, prior notification of this arrangement should be given to the Department by all the authorities involved.

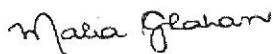
Consultation:

25. It will be a matter for the relevant Manager to arrange for the Needs Assessment to be prepared in line with the requirements and criteria of this circular. When completed, the appropriate Strategic Policy Committee within the authority should consider the assessment and their views taken into consideration before submission to the Department. It will be a matter for authorities to consider the need for public consultation on the outcome of the needs assessment process given the extensive public consultation already undertaken in relation to River Basin Management Plans.

26. Enquiries and Completed Needs Assessments:

This circular should be brought to the attention of all administrative and engineering personnel involved in the Water Services Investment Programme. It is available on SHAREPOINT and the Water Services Training Group website (www.wsntg.ie). Completed Needs Assessments should be sent to Mr Jim Coll

jim.coll@environ.ie) Water Services Section, Floor 1, Block 2, Irish Life Buildings, Lower Abbey St., Dublin 1 by **23 October 2009**. General enquiries about this Circular may be made to Enda Falvey, Water Services Section at 01 888 2156 or by e-mail at enda.falvey@environ.ie. Specific enquiries in relation to the Water Conservation Template Report at Appendix 2 may be made to Colm Keenan, Water Services Section at 01 888 2106 or by e-mail at colm.keenan@environ.ie.



Maria Graham
Principal Officer
Water Services Section.

**To: County and City Managers
Directors of Services (Water Services Infrastructure)**

Appendix 1

In line with the programme priorities for the Water Services Investment Programme 2010 – 2012, authorities are asked to list works under four broad categories of need, as detailed below. Where the requirement is to list contracts, these would include Substantial Advance, Treatment Plant Civil, Treatment Plant M&E, Treatment Plant DBO [Civil and M&E], Network Civil, Network M&E or Pumping Contracts, where separate, but not investigation contracts, survey contracts or miscellaneous consultancy contracts.

Category 1: Water conservation contracts and other water conservation schemes that meet environmental, public health and/or economic goals, as appropriate should be listed in this category.

The case for a greater focus on water conservation works is well established. The primary objective of the Department's Water Conservation Programme is to reduce water loss in the distribution networks to an economic level. This involves water services authorities having water management systems in place to monitor water use and losses throughout the supply networks, to fix leaks and to replace defective pipes where repair is no longer an economic option. Data gathered from the management system (established under Stage 1 and Stage 2 Works, as per Circular L6/07)) should be used to target specific lengths of mains so as to achieve the maximum in leakage reduction from the minimum level of investment. Conservation is a practical, realistic and economic way of meeting much of the extra demand for water. Additional water supply capacity through leakage control and better supply system management is a viable alternative to capital investment in new infrastructure, and reduces environmental degradation by deferring the need to develop new drinking water sources.

Issues to be considered in drawing up this list should include the steps necessary to meet the 2013 parametric value for the presence of lead in drinking water, based on the approach outlined by the EPA in its Lead Guidance Circular No 2 of 21 April 2009, and the **contracts** or **schemes** proposed in this regard should be clearly indicated.

Consideration should also be given to works related to Asset Management Studies, which build on the completed mapping of water and wastewater networks under the 'Complete Information System' and which are designed to build up an accurate picture of

network deficiencies and identification of priorities for network rehabilitation and replacement.

Category 2: Works required in response to European Court of Justice (ECJ) judgements should be listed in this category.

Failure to adequately address adverse ECJ findings can result in the EU imposing financial penalties on Ireland. The ECJ drinking water judgement of 2002 (C316-00) has already given rise to a lot of priority works in recent years, especially on the Rural Water Programme. Any outstanding works in relation to that judgement need to be completed. Priority should also be accorded to addressing works required as a consequence of ECJ judgement of 2008 (C316-06) in relation to the provision of secondary wastewater treatment facilities at specified agglomerations and the ECJ judgement of 2005 on Dangerous Substances in Water (C282/02).

The preparation of this list should, in the case of water supply **schemes**, identify any remaining **contracts/schemes** cited in Annex 12 of the EU Commission's application to the European Court of Justice in respect of Ireland's implementation of Directive 80/778/EEC (the Drinking Water Directive), where not addressed under the Small Schemes Measure of the Rural Water Programme.

Category 3: Contracts and schemes concerned with meeting statutory environmental or public health requirements to be specified (eg Drinking Water Regulations, Urban Wastewater Treatment Regulations, Wastewater Discharge Authorisation Regulations, Bathing Water Regulations etc) and works arising in the context of compliance with the Water Framework Directive should be listed in this category.

While most of the work required under the Urban Wastewater Treatment Regulations to meet the end of 2005 deadline for the provision of secondary wastewater treatment at wastewater treatment plants has now been completed (some 92% compliance with the Directive deadline has been achieved), there remains a number of relatively small agglomerations where the required work needs to be completed as a priority.

The Waste Water Discharge (Authorisation) Regulations, 2007, provides for an authorisation system for all wastewater discharges to waters from treatment plants or collection systems owned or controlled by local authorities. Introduced on a graduated basis since 2007, local authorities may not cause or allow discharges from wastewater facilities except in accordance with EPA requirements. As the licensing regime intensifies, works needing to be done to meet the EPA's requirements will increase, including the upgrading of storm water/combined sewers overflows.

The increased responsibility conveyed on the EPA under the 2007 Drinking Water Regulations is reflected in their identification in their annual reports since then of drinking water supplies in need of attention – 'Remedial Action List Supplies'. Dealing with deficiencies in drinking water supplies, identified by the EPA, will be an ongoing priority.

The preparation of this list should be informed by whatever steps are necessary by way of infrastructure provision to address the issues raised in relation to combined sewer overflows and nutrient reduction raised in Case C-95/09 brought to the European Court of Justice by the European Commission. A list of the agglomerations raised in this context is outlined in Appendix 3.

The list should also reflect the need to ensure compliance with the Water Framework Directive and the issues emerging from the River Basin Management Plans process, including any emerging priorities that might be advanced over the 2010 – 2012 period. The Water Framework Directive (WFD) requires generally that the water environment must be managed with the aim of achieving at least 'good status' in all water bodies by 2015 and maintaining 'good status' where it exists. River Basin Management Plans will be made in 6 year cycles covering the period to 2027, with the first of these plans to be made by the end of 2009.

The impact of other EU and national requirements will also exert considerable pressure in the years ahead – for example remediation of environmental blackspots, compliance with Bathing Water Regulations, compliance with the proposed Freshwater Pearl Mussel Regulations and meeting requirements in relation to shellfish waters.

Category 4: Contracts and schemes concerned with supporting the sustainable development of gateways and hub towns under the National Spatial Strategy,

strategic areas designated under the developing areas initiative and works necessary to sustain or create employment in other areas should be listed in this category.

The need to promote more sustainable development patterns within and the enhanced economic development of hubs and gateways under the National Spatial Strategy and developing areas are key requirements in prioritising the need for increased water and wastewater treatment capacity. The objective here is essentially to encourage more compact, more competitive and higher quality urban areas taking a lead from the relevant settlement strategies of statutory Development Plans, Regional Planning Guidelines and other strategic development frameworks such as those prepared for the rejuvenation of brownfield areas including docklands. Regard should also be taken of the 2008 Forfas Report – *Assessment of Water and Wastewater Services for Enterprise* - which recommended prioritisation of investment for key centres which are likely to require additional water and wastewater treatment capacity in the coming years. The water/ wastewater needs of developing areas (under the developing areas initiative) should also be established. In other areas, investments may also be required both to sustain existing employment and for the purpose of supporting economic and employment growth.

WATER CONSERVATION - ASSESSMENT OF NEEDS - APPENDIX 2

Explanatory Notes

Note 1: The categories of works appropriate to Stages 1, 2 and 3 water conservation works are set out in Part 2 of Circular L6/07 of 22 August 2007.

Note 2: For the purposes of PARTS 1, 2 and 3 of the Form, a local authority's own direct costs (staff, equipment, materials etc) for water conservation works may be regarded as a single contract for the purposes of this Needs assessment. The objective is to identify the key components of a water conservation scheme or phase of a scheme.

Note 3: The contracts in PART 3 and the schemes in PART 4 of the Form must be listed in order of priority on a county wide basis. This is essential to ensure that the Department is in a position to identify the key contracts or schemes for inclusion in the next phase of the Water Services Investment Programme.

Note 4: IN PARTS 1, 2 and 3 of the Form, any additional grant funding required must be in respect of eligible works only (see Note 1). Additional funding should not arise at this stage in respect of the schemes in Planning.

Note 5: The 2003 water conservation allocations notified to many local authorities were intended as seed capital to enable those local authorities to put in place water management (Stage 1) and leakage control (Stage 2) systems. Other local authorities had already received grant funding to put such systems in place under an earlier phase of the national water conservation programme. The Department never intended to continue to fund Stage 1 & 2 works indefinitely. At this stage, the Department assumes that ALL local authorities have some form of water management and leakage control systems in place and that the majority of local authorities are funding such services from their own resources. Accordingly, where a local authority proposes to seek additional funding for Stage 1 and Stage 2 works included in PARTS 1, 2 or 3 of the Form, clear justification for the additional funding will have to be given to the Department before any such funding will be approved. By the end of the next phase of the Water Services Investment Programme i.e. 2012, ALL local authorities should be funding Stage 1 and 2 works from their own resources. Hence, PART 4 of the Form should list Stage 3 (mains rehabilitation) schemes only.

Note 6: As regards Stage 3 contracts and schemes listed in PARTS 3 and 4 of this Form, each local authority is reminded of the requirement to adopt a mains rehabilitation strategy as set out in Circular L6/07. Such a strategy represents a detailed appraisal by a council of its district metering areas (DMAs), based on data from its ongoing Stage 1 and 2 water conservation operations. The strategy must be submitted to the Department before any new mains rehabilitation / replacement contract or scheme will be approved.

Note 7: The water conservation contracts and schemes, especially mains rehabilitation works, included in PARTS 3 and 4 of the Form should be realistic in terms of the scale and scope of the works proposed and the expected timelines for delivery and the works should be phased as far as practicable (ideally, individual contracts or schemes should not exceed €5 million in value) to facilitate the allocation of available capital funding. Local authorities should be in a position to advance the contracts listed in PART 3 of the Form to construction during the period 2010 – 2012, and to advance the schemes listed in PART 4 through planning so that they can start under the next phase of the Water Services Investment Programme post 2012.

Note 8: In relation to columns 6 - 9 of PART 3 and columns 4 and 5 of PART 4 of the Form, a NIL return should be inserted in those columns where the Department has yet to approve a grant for the contract or scheme in question.

Note 9: Each local authority involved in the Dublin Region Watermains Rehab Project (DRWRP) should also include the DRWRP contracts in its area when completing its water conservation needs assessment. The DRWRP contracts should be **highlighted on the Form**. Local authorities are requested to clear DRWRP costs with Dublin City Council, as the lead authority for the DRWRP, to ensure accuracy and consistency in the returns submitted to the Department.

Note 10: In PARTS 3 and 4 of the Form, mains rehabilitation works that include the replacement of lead mains/connection pipes, where **treatment solutions are not sufficient**, to meet the 2013 parametric value for the presence of lead in drinking water, based on the approach outlined by the EPA in its Lead Guidance Circular No. 2 of 21 April 2009, **should also be highlighted**.

Note 11: The financial data requested in this Form will enable the Department to estimate the national and local capital requirements for water conservation works for the period 2010 - 2012. Accordingly, local authorities are requested to ensure, as far as practicable, the data submitted is as accurate as possible.

Appendix 3 – Agglomerations cited in recent ECJ Case

A: Agglomerations alleged to be not in compliance with Article 3 of the EU Urban Wastewater Treatment Directive.

Ballincollig, Carrickmacross, Cavan, Enniscorthy, Fermoy, Glanmire/Riverstown/Little Island, Mallow, Midleton, Mullingar, Osberstown, Roscommon, Roscrea, Tramore River Valley, Thurles.

B: Agglomerations alleged not to be in compliance with Article 5 of the EU Urban Wastewater Treatment Directive.

Ballincollig, Carrickmacross, Cavan, Enniscorthy, Fermoy, Cork City, Glanmire/Riverstown/Little Island, Tramore River Valley, Mallow, Midleton, Mullingar, Osberstown, Portlaoise, Roscommon, Roscrea, Thurles, Athlone, Castlebar, Kilkenny, Malahide, Monaghan, Navan, New Ross, Ringsend, Swords, Tralee, Tullamore, Wexford.

