

Status of Local Government Sector Water Governance and Functions

September 2025



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1. Executive Summary¹

Purpose and Strategic Context

This report provides a comprehensive strategic review of the Local Government Sector’s water-related functions in Ireland, in support of the third River Basin Management Plan (RBMP) 2022–2027, known as the Water Action Plan (WAP). It responds to recommendations from the Public Sector Reform Oversight Group (PSROG) and aims to guide the County and City Management Association (CCMA) and the Local Government Management Agency (LGMA) in strengthening governance, resourcing, and delivery of water functions across the sector.

The strategic importance of this review lies in its alignment with national and EU environmental objectives, particularly the EU Water Framework Directive (WFD), and its potential to unlock multi-benefit outcomes across climate adaptation, biodiversity, and community development.

Strategic Importance of Local Government in Water Governance

- **Central Role in Implementation:** Local Authorities are the primary delivery agents for water protection and restoration measures, with responsibilities spanning enforcement, catchment assessment, planning, and community engagement.
- **LAWPRO as a Strategic Asset:** The Local Authority Waters Programme (LAWPRO) is a national shared service delivering 76 WAP actions. It plays a pivotal role in regional coordination, catchment science, and stakeholder engagement.
- **Governance Evolution:** Enhanced governance structures—such as the Water Quality Oversight Group and proposed Natural Waters Project Office—are designed to embed water priorities within senior management and ensure strategic coherence across the sector.
- **Policy Integration Potential:** Water functions intersect with climate, biodiversity, planning, and rural development policies. Strategic integration offers opportunities for more efficient service delivery and greater environmental impact.

Key Strategic Findings

- **Resource Deficits:** Two business cases—PMO 21/07 (Local Authority Natural Water Functions) and PMO 24/01 (LAWPRO)—identify urgent staffing and funding needs. Combined, they seek 119 posts and an additional €13 million in annual funding.
- **Unaddressed Functions:** Critical areas such as urban runoff, hydromorphology, marine strategy, and ICT/data management are not yet resourced and require strategic planning.
- **Operational Complexity:** Local Authorities operate across 24 water-related functions, many of which are multidisciplinary and require inter-agency collaboration.
- **Performance and Risk:** Ireland faces multiple EU infringement cases related to water quality. Failure to act risks reputational damage, financial penalties, and environmental degradation.

Strategic Risks of Inaction

- **Non-compliance with EU Directives,** risking significant financial penalties and reputational harm.
- **Failure to meet WFD objectives,** leading to environmental degradation and loss of Ireland’s “green image.”
- **Under-resourced delivery,** undermining the effectiveness of the Water Action Plan and future RBMPs.

¹ The Executive Summary of this report was generated using Microsoft Copilot (V1.2, 3.6.2025) utilising the content of the main report. Reviewed and approved by Anthony Coleman, Director of Services, LAWPRO

- Missed opportunities for policy integration, resulting in fragmented service delivery and reduced impact.

Strategic Recommendations

1. Governance and Coordination

- Establish the Natural Waters Project Office to coordinate water functions, support policy development, and monitor emerging obligations.
- Strengthen the Water Quality Oversight Group as the central governance body linking CCMA, LAWPRO, and DHLGH.

2. Resourcing and Capacity Building

- Secure urgent approval and multi-annual funding for PMO 21/07 and PMO 24/01 to address immediate resource gaps.
- Implement the Local Authority Water Quality Training Plan 2026–2030 to build enforcement and technical capacity.
- Develop a national ICT/data management system (NEMIS) to support evidence-based decision-making and performance tracking for water protection.

3. Strategic Integration and Policy Alignment

- Embed water protection as a corporate priority across all Local Authority functions and strategic plans.
- Align water actions with climate and biodiversity strategies to maximise co-benefits through nature-based solutions (NbS).
- Define the future role of Local Authorities in rural water provision, particularly post-Uisce Éireann transition.

4. Community Engagement and Communications

- Leverage Local Authority platforms to lead community engagement and improve water literacy.
- Establish Catchment Community Fora to support bottom-up participation in and over time influence in water resource management through the Catchment Management Work Plans and local ownership of water initiatives.

Conclusion

This review presents a strategic roadmap for enhancing the Local Government Sector’s role in water governance. By acting on the recommendations, senior management can ensure that water functions are adequately resourced, strategically aligned, and embedded within the broader environmental and community development agenda. The time to act is now—delays will compromise Ireland’s ability to meet its legal obligations and environmental ambitions.

2. Introduction

2.1 Purpose of this Report

Ireland is now progressing with implementation of the third River Basin Management Plan 2022-2027 (RBMP), entitled the 'Water Action Plan'² (WAP), which aims to ensure that our natural waters are sustainably managed and are restored to good or high ecological status by 2027 in accordance with the requirements of the [EU Water Framework Directive 2000](#) (WFD).

The Local Government Sector plays a significant role in the WAP's implementation in the context of environmental enforcement, co-ordination, oversight, catchment assessment, administering funding programmes, and community support and engagement.

Certain Local Authority functions are provided exclusively by individual Local Authorities, such as enforcement, while others are provided by the Local Authority Waters Programme (LAWPRO). LAWPRO is a local government national shared service, working on behalf of all 31 Local Authorities in Ireland, and funded by the Department of Housing, Local Government and Heritage (DHLGH). Kilkenny and Tipperary County Councils jointly manage LAWPRO, which was originally established in 2016 to support the implementation of the WFD.

In terms of the Local Government Sector roles, WAP 2024 contains commitments to:

- review Local Authority resources and to put in place appropriate resources to support individual Local Authorities fulfil their role in water quality protection and restoration,
- provide additional LAWPRO resources to support the implementation of the WAP,
- extend LAWPRO for the full duration of the third RBMP Cycle up to 2027, and
- require County and City Management Association (CCMA) to identify the appropriate level of resources and involvement of LAWPRO to meet WFD objectives up to 2027 and beyond for future RBMPs.

Having regard to same, two CCMA Business Cases have been developed in relation to:

- Local Authority Natural Water Functions & Resources (Business Case PMO 21/07)
- Local Authority Waters Programme (Business Case PMO 24/01)

Both business cases are currently being peer reviewed in accordance with the Local Government Management Agency's (LGMA) Peer Review Process Guidelines. As part of their assessment of both business cases, the Public Sector Reform Oversight Group (PSROG) recommended that a wider strategic review of all Local Government Sector water functions be undertaken.

The purpose of this report is to document the status of Local Government water governance and functions utilising available information and identify gaps in activity. This will assist the CCMA's ECCE Water Quality Oversight Group to develop a strategy for the natural water sector and ensure greater involvement in governance structures, policy review and implementation.

The report will consider current and emerging Local Government Sector water functions from the following perspectives:

- Legislation, policy and drivers,
- Local Authority sector water governance and functions,
- Identified gaps, and

² [River Basin Management Plan 2022 - 2027](#)

- Local Government recommendations.

This report will also consider the wider environmental benefits that could accrue by taking a more holistic approach to all local authority water related functions having regard to the sectors responsibilities in terms of climate adaptation, climate mitigation, biodiversity and community development.

2.2 Context

Since the enactment of the WFD in 2000, Ireland has had three successive cycles of River Basin Management Plans, the current being in place for the 3rd cycle period 2022 to 2027 known as the Water Action Plan (WAP). Steady progress has been made to date including:

- the enactment of appropriate legislation to transpose the European Directives into Irish legislation,
- the development of ‘Whole of Government’ policies and plans to improve practical implementation of the relevant legislation,
- the establishment of a range of governance structures to support targeted actions,
- the use of a catchment science approach in the implementation of targeted measures,
- the commencement of development of sectoral action work plans, which identify sector-specific actions to be taken by the relevant agencies with timelines and indicative outcomes,
- the commencement of development of catchment management work leading to their establishment in each of Ireland’s 46 hydrometric catchments.

Despite these developments in water governance and targeted actions, the positive outcomes in terms of improvements to natural water quality have not yet been achieved to the extent required. In October 2024, the Environmental Protection Agency (EPA) in its report ‘*State of the Environment Report*’³ stated that only 54% of our surface waters (rivers, lakes, estuaries and coastal waters) are in High/Good status. Of these surface waters, coastal waters currently have the highest percentage of waters in satisfactory condition (81%), while estuaries are in the poorest conditions with only 36% in High/Good status.

However, there are indicators of good progress in some areas. A targeted approach is being used to implement the plan’s delivery in Priority Areas for Action (PAAs). Under the second river basin management plan cycle, net improvement in river water quality in PAAs was better when compared to the national situation indicating that when targeted action is taken, improvements in water quality can be achieved.

The Local Authority Sector (through LAWPRO) leads the work in these PAAs, including local catchment assessment process, determining significant pressures, where they are located, and advising on the targeting of measures to remediate their impacts. The agencies of the State, individual Local Authorities, landowners, communities and others, develop restoration approaches and implement the recommended measures. The coordination of the delivery of actions is managed in multiple ways, including through the Water Framework Directive Governance Structures (see Chapter 3) and is planned to be further coordinated by the recently established Programme Delivery Office (DHLGH). Therefore, the progress achieved following a targeted action approach is a whole of water sector collaboration, which has now been scaled up significantly for the 3rd Cycle.

³ [State of the Environment Report – Chapter 8: Water](#)

It is important to recognise that progress towards meeting water quality objectives has been increasingly impacted by a range of significant challenges such as population growth, economic development, historic land use decisions (e.g. agricultural growth, peat extraction, forestry, etc.), and climate change, which have all contributed to the ever-increasing challenge to reach good and high status in all waters.

2. Legislation, Policy and Drivers

Legislation and policy that impact water at both EU and National level is often complex and intertwined. This chapter focuses on identifying relevant and complementary legislation that directs national policies and plans, which seek to protect and restore natural waters. It also considers other main drivers, which bring increased attention to water management issues.

2.1 Water Framework Directive (WFD)

The EU [Water Framework Directive](#) (2000/60/EC) is the most important and instructive directive in the context of water management. It established a framework for the protection of inland surface waters, transitional waters, coastal waters and groundwater. It aims to:

- prevent and reduce pollution,
- promote sustainable water use,
- protect and improve the aquatic environment, and
- mitigate the effects of floods and droughts.

Article 4 of the WFD sets out key objectives, which requires Member States to develop and implement River Basin Management Plans (RBMPs) and Programmes of Measures (PoMs) to protect and, where necessary, restore water bodies to reach good status, and to prevent deterioration. Good status refers to both good chemical and ecological status.

Ireland is now in the third cycle of RBMPs and preparation of the fourth cycle plan is underway. It is recognised at Member State and EU level that the objectives of achieving high or good status by 2027 will not be met in all instances. The European Commission is commencing a structured dialogue with Member States to identify the reasons for not meeting the objectives. **It is recognised that there will be ongoing river basin management plans needed to restore, but more importantly over time, to protect water quality.**

The WFD is supported by a complex array of more targeted EU directives, which are outlined below (Figure 1). These directives form part of the Programme of Measures delivery under national RBMPs for each Member State. The key objectives of each directive are presented in Appendix 1.

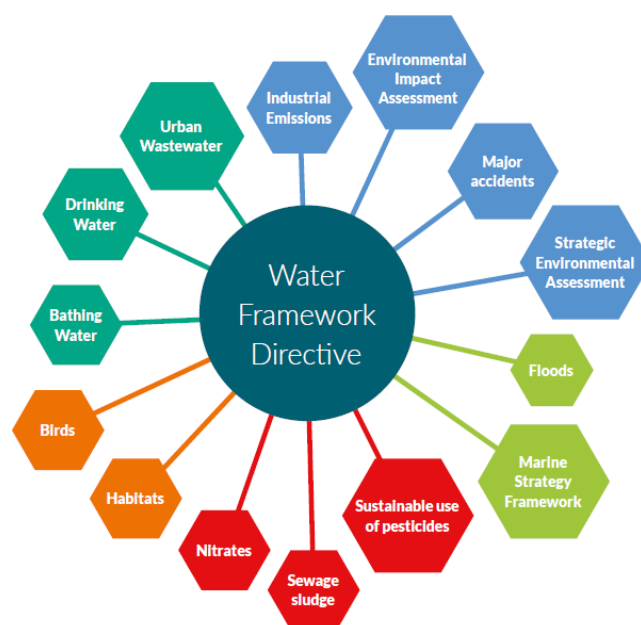


Figure 1: WFD interaction with other EU legislation

2.2 Associated Water Legislation (Irish Context)

There are fifteen EU water related Directives that have been transposed into Irish legislation, Table 1. [Appendix 2](#) provides a summary of each piece of legislation, along with the role of the Local Authority sector in its implementation.

Table 1 EU water related Directives

EU Directive
Water Framework Directive (2000/60/EC)
Groundwater Directive (2006/118/EC)
Drinking Water Directive 2020/2184 (recast of original directive 98/83/EC)
Bathing Water Directive (2006/7/EC)
Environmental Quality Standards Directive (2008/105/EC)
Urban Waste Water Treatment Directive (91/271/EEC) & recast directive 2024/3019
Nitrates Directive (91/676/EEC)
EU Floods Directive (2007/60/EC)
EU Marine Strategy Framework Directive (2008/56/EC)
Birds (2009/147/EC) and Habitats (92/43/EEC) Directives
Strategic Environmental Assessment (SEA) Directive (2001/42/EC)
Environmental Impact Assessment Directive (2014/52/EU)
Major Accidents (Seveso III) Directive (2012/18/EU)
Sustainable use of Pesticides Directive (2009/128/EC)
Industrial Emissions Directive (2010/75/EU)

The Local Authority sector's role is significant and wide-ranging from support functions (e.g. administration of private well grants) to direct enforcement and oversight (e.g. agricultural inspections). Many functions are complementary such as drinking water source protection (Drinking Water Regulations) and Local Catchment Assessment (WFD). In most cases, functions are multidisciplinary and require significant engagement with other state and non-state stakeholders. These functions are further explored in [Chapter 3](#).

2.3 Plans and Drivers that Impact Water

Legislation and policies are implemented through a range of national and local plans. The most significant of these from a water perspective is the [Water Action Plan 2024](#), but there are many others plans and drivers for action that support and complement WFD objectives that are summarised in this section.

[Water Action Plan 2024](#)

Under the WFD all EU Member States are legally required to develop and implement River Basin Management Plans in identified cycles. **The WAP 2024-27 is Ireland's River Basin Management Plan for the third cycle and is therefore the most important plan in the context of water management nationally.**

The WAP sets out Ireland's structures, objectives and actions to achieve good or high ecological status by 2027 in accordance with the requirements of the WFD. Its mission is:

"To take action to protect and improve all of Ireland's water bodies by implementing the right measure in the right place, at the right time, with the objective of reaching as close to full compliance with the Water Framework Directive by 2027 as possible, and closing any remaining gaps as quickly as possible, thereafter, subject to the rules of the directive."

Building on the work of the first and second-cycle River Basin Management Plans, the WAP:

- restates and updates the main pressures and activities affecting water status,
- sets out the environmental objectives to be achieved up to 2027,
- identifies the measures needed to achieve these objectives, and
- provides for ongoing collaborative participation of, and action by, stakeholders at national, regional, sectoral and community levels.

Some key expected outcomes from the WAP are listed below, where the items highlighted in bold are actions being delivered by the Local Authority sector:

- **7 Sectoral Action Work Plans and 46 Catchment Management Plans,**
- **Establishment of Catchment Community Fora,**
- **Focused attention in 517 Areas for Action (AFA),**
- **4,500 farms inspected per year under National Agriculture Inspection Programme,**
- **15,000 applications in the Farming for Water EIP – including nature-based solutions,**
- Mitigation of 270 barriers under the National Barriers Mitigation Programme,
- Uisce Éireann investment (approx. €2.3 bn) in 108 waste water treatment plants, 77 collection networks and 92 related national programmes,
- Programme Delivery Office in the DHLGH to provide oversight and track implementation of the plan.

The level of ambition to restore and protect water quality in specific AFAs (see [Appendix 3](#) for a map of all AFAs in the WAP) has been scaled up significantly in this plan. The Local Authority sector is taking a leading role in 455 of these areas with 343 PAAs being led by LAWPRO and 112 AFAs being led by individual Local Authorities.

The governance structures established for oversight and implementation of the plan are summarised in [Appendix 4](#).

Other plans that support WAP implementation

At national and local level there are several plans containing objectives, which support water restoration and protection principles as referenced below:

- Ireland's 4th [National Biodiversity Action Plan](#) (NBAP) sets the national biodiversity agenda for the period 2023-2030 striving for a "whole of government, whole of society" approach to the governance and conservation of biodiversity. Individual Local Authority Biodiversity Action Plans 2025 – 2030 are currently in development.
- [Climate Action Plans](#) have been developed at national and local level with annual progress reporting in place. These plans contain cross-cutting actions to support the delivery of sectoral climate action through improvements in governance, finance, planning, research, citizen engagement, circular economy, adaptation, and public sector leadership.
- **Nature Restoration Plans** - A substantial change in how we manage our natural ecosystems is on the horizon with the adoption of the [Nature Restoration Law in June 2024](#). The legislation combines an overarching restoration objective for the long-term recovery of nature in land and sea areas with binding restoration targets set for specific habitats and

species. These measures are required to cover at least 20% of the EU's land and sea areas by 2030, and ultimately all ecosystems in need of restoration by 2050.

- Local Authorities adopted new **Corporate Plans** at the end of 2024, which serve as the local authority's strategic framework for action over the duration of the plan (2024-2029). Corporate Plans are required to consider obligations contained in relevant legislation including those relating to climate change and the natural water environment, thus ensuring that compliance with same is embedded right across all service areas and activities.
- Local Authorities, as Planning Authorities, have adopted **County/City Development Plans**, which support and implement many of the key objectives of the WFD and the WAP. The plans provide for the protection of natural habitats and water bodies; encourage investment in flood risk management requiring the incorporation of natural water retention measures and sustainable urban drainage measures; safeguard contamination of waters by ensuring appropriate wastewater infrastructure.
- **Local Economic and Community Plans** (LECP) sets out, for six years, the objectives and actions needed to promote and support the economic and community development of the county. It is the primary tool for delivering actions from national and regional strategies at a local level. It is designed to integrate actions and initiatives related to economic and community development in local authority area into a single unified strategy.

Many of the actions identified and being implemented in these plans are complementary and support WFD implementation. Local Authorities play a critical role in achieving their successful delivery, which requires efficient coordination and innovative communications. In addition, they have significant potential to achieve multiple environmental outcomes from singular actions. Water related actions are often the catalyst for achieving the desired multiple benefits such as cross-cutting nature-based solutions (NbS) projects which support Water, Climate and Biodiversity Action Plans. For example, Local Authorities using NbS to enhance urban drainage and help alleviate flooding (climate adaptation), can provide additional habitats for nature (biodiversity enhancement) while improving water quality before returning it to the natural environment (WFD). NbS is explored further in Chapter 3.

Wider Policy Lens and Policy Integration

Other policies relevant to water management, which support the Water Framework Directive and where local authorities have a significant role to play include, but are not limited to:

- The **UN Sustainable Development Goals** (SDGs) address global challenges, including climate change and environmental degradation. While the 17 SDGs are interconnected, *SDG 6 - clean water and sanitation for all*, is particularly relevant in the context of water management. The WAP outlines actions to protect and restore water resources in compliance with SDG 6. **SDGs are integrated in all Government and Local policies and plans, ensuring the interconnectivity of all actions, regardless of the service area.**
- Successive **Programmes for Government** set out ambitious environmental programmes, which reflect the SDGs and the requirements of the WFD, in addition to providing resources necessary to achieve these objectives. Relevant examples include the 'Green New Deal' (2020), which sets out a comprehensive range of actions for water, natural heritage and biodiversity, climate, and environmental emissions, reinforced by **integrating a 'Whole of Government Approach' (2025) for Water, Climate and Biodiversity action plans.**
- The **National Planning Framework** (NPF) promotes balanced regional development and sustainable growth economically, socially, and environmentally. It underwent its First Revision in April 2025. Local Authorities hold significant responsibility in providing for

and delivering on the provisions of the NPF in the context of spatial planning, climate change management, biodiversity management and natural resources protection.

Implementation of the National Planning Framework, along with the ‘[Planning and Development Act 2024](#)’ provide opportunities for wider integration of environmental policies.

- The 2023 [Report of the Citizens’ Assembly on Biodiversity Loss](#) contains over 150 recommendations aimed at ‘*transforming the country’s relationship with the natural environment*’. **The report has a particular focus on water quality and freshwater systems and restates many of objectives contained in existing plans and policies.**
- The Government’s second [Water Services Policy Statement 2024 – 2030](#) prioritises water availability & reliability, safety & quality and sustainability thus supporting WFD objectives. Water Services has undergone significant change in recent years with the establishment of Uisce Éireann (UÉ) in 2014, who are now responsible for the provision of public water and wastewater services. Since 1996 Local Authorities provide regulatory (supervisory functions) and support functions for private supplies and remain a key partner in the delivery of the rural water programme. The sector has identified that there is still clarity required from the DHLGH on the roles and responsibilities of LAs and UÉ in relation to remaining water related functions and applicable legislation. This is key item in the ongoing transition, and some services are subject to ongoing Memorandum of Understanding (MoU) development and agreement. This may be a risk to seamless implementation in certain areas of service provision.

The new **Drinking Water regulations 2023**, expand the local authority sector's role for private supplies and improve alignment between the WFD and Drinking Water Source Protection policy. [Technical guidance](#) in this area was developed by a multi stakeholder working group to ensure that the catchment ‘Risk Assessment’ and ‘Risk Management’ processes required under the Drinking Water Regulations for both public and private supplies align with the processes already being implemented under the WFD. Currently, the Local Authorities sector’s supporting role in implementing the regulations for private supplies is significant.

However, the CCMA has advised the DHLGH that the capacity and expertise within some Local Authorities’ Rural Water Departments has been significantly impacted by the transfer to Uisce Éireann of public water services and staff with the knowledge and skillset to address remaining water related functions.

In addition, there are emerging regulatory challenges due to the introduction of the new Drinking Water regulations. The CCMA membership holds diverse views on the optimal future structure for rural water service delivery, but most authorities acknowledge that maintaining the current arrangements without substantial additional resources is not viable for the sector. It is important to ensure that whatever structure emerges from the review process is adequately resourced, technically competent, and legally compliant.

Continual engagement between the CCMA (and TIN committee) with the DHLGH is required to ensure that a sustainable service delivery model is achieved that ensures quality service, public health protection, environmental compliance, and value for money, which will contribute to the development of a sustainable solution for the rural water sector. It is recommended that these proposals also consider any impacts on the natural waters area.

- [Our Rural Future – Rural Development Policy 2021 – 2025](#) presents a comprehensive, place-based strategy to revitalise rural Ireland. It focuses on leveraging digital

connectivity, promoting sustainable growth, enhancing public services, and empowering communities to ensure balanced regional development by 2025 and beyond. Local Authorities play a leading role in relation to a range of measures supported by this policy including large scale infrastructural projects (Rural Regeneration and Development Fund), smaller scale projects (Town and Village Renewal schemes) in additions to supporting communities (Tidy Towns, etc.).

Many of these programmes include complementary objectives in terms of protecting and restoring water quality, climate adaptation and the protection of the natural environment.

Balancing economic development and accommodating population growth while minimising environmental impact will always remain a challenge. Although improvements have been made to ensure greater cohesion between policies that impact water and the wider environment, there is potential to further enhance the integration of water across the Local Government Sector, which is explored in [Chapter 3](#).

Other Drivers

Aside from legislative, policy provisions and plans, there are several other important drivers for enhanced actions in relation to water quality. These include, but are not limited, to the following (explored further in [Appendix 5](#)):

- **Court of Justice of the European Union (CJEU) Infringement cases**
Despite the work to date Ireland has five water related infringement cases at various stages in the CJEU. The urgency of addressing these cases is acknowledged given the potential impending fines and risk to Ireland's 'Green Image'.
- **Deteriorating Quality of Ireland's Environment**
Despite significant investment by the state, Ireland's Environment continues to deteriorate as highlighted by the EPA State of the Environment Report 2024. This report emphasises the need for 'urgent interventions' and 'greater momentum' to address water quality, climate change and biodiversity decline.
- **An Expanding Agricultural Sector**
Agriculture has expanded significantly over recent years into a multi-billion Euro industry largely supporting our rural economy. While agricultural policy transitions towards sustainability, deteriorating water quality threatens retention of the 'Nitrates Derogation' and agriculture remains the most significant pressure on water quality.
- **Economic, Social & Cultural Drivers**
The economic, community, and cultural benefits that flow from implementing a robust system of water resource management are many. Achieving a balance between economic development and environmental sustainability remains a challenge given the ever-evolving demands of society.

3. Local Authority Sector Water Governance and Functions

Local Authority legal obligations in relation to water are significant as referenced in chapter 2. This chapter initially focuses on governance arrangements as provided for in the WAP and more recently enhanced structures within the Local Government Sector. The chapter then considers all Local Authority sector water related functions, including those directly required in the WAP. It also considers how a more holistic approach could be taken to embed water protection across wider Local Authority functions.

3.1 Local Government Governance

Governance Arrangements provided for in the WAP

The WFD Governance Structure established during the second cycle river basin management plan has further evolved during the third cycle and is intrinsically linked to the local authority governance structures as illustrated below. The relationships between the established three tiers of governance are further elaborated on in [Appendix 4](#). The Local Authority sector plays an important supporting role within Tier 1 and Tier 2 of the structure, while leading the coordination of Tier 3 (see figure 2). The relationship between the three tiers and the local authority sector is outlined in the graphic below

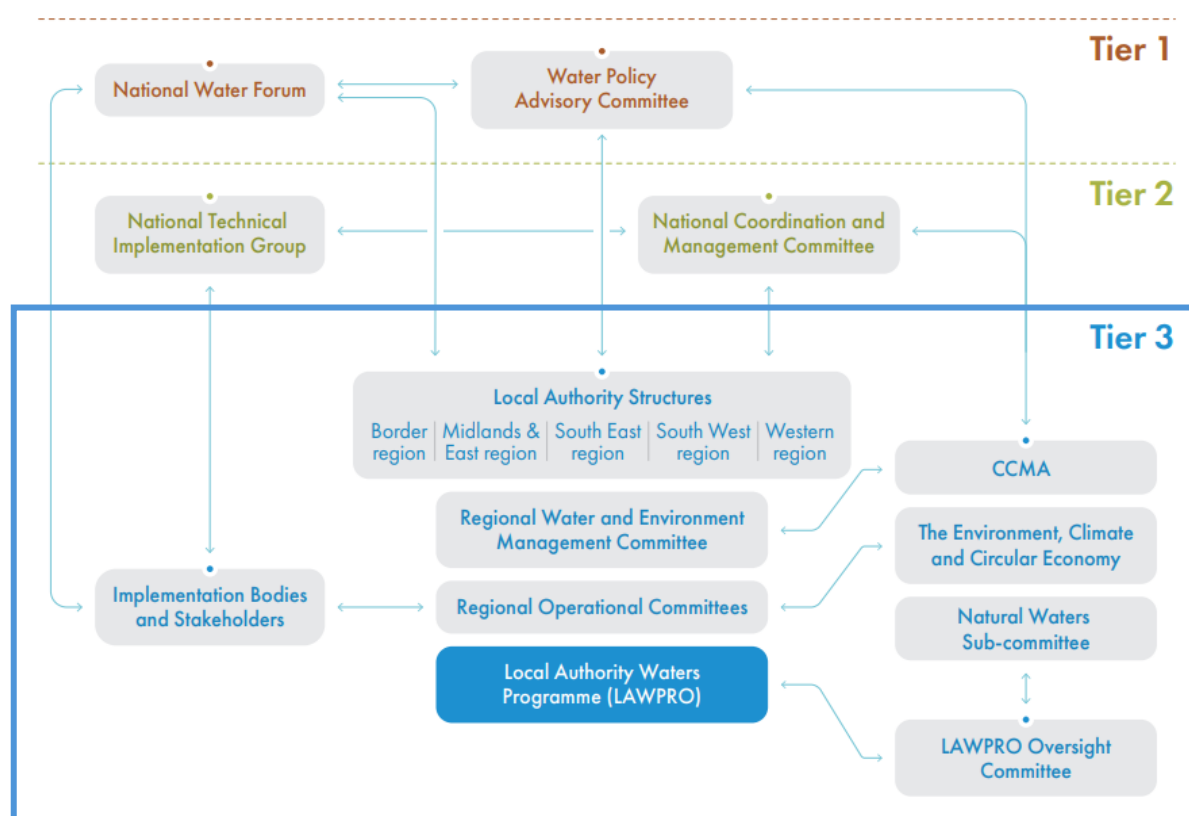


Figure 2: Summary of the WFD Governance Arrangement

At Tier 3 level (boxed area in Figure 2), five Regional Water and Environment Management Committees are established in line with LAWPRO's regional structure. These committees oversee the implementation of the Water Action Plan at regional level. Each Regional Water and Environment Management committee (RWEMC) is chaired by a Local Authority Chief Executive and is made up of Directors of Service and senior representatives from each Local Authority in the region, with active participation and technical advice from the EPA and representation from

the new DHLGH Programme Delivery Office (PDO). Each RWEMC is supported by a Regional Operational Committee (ROC) with a membership comprised of operational staff from all relevant WFD implementing bodies and stakeholders and is chaired at Director of Service level. LAWPRO plays an important coordination role in the management and facilitation of these committees.

LAWPRO has an Oversight Committee comprising of representatives from the Department of Housing, Local Government and Heritage, Department of Agriculture, Food and the Marine, local authorities, and the EPA. An Fóram Uisce also attend oversight committee meetings in an observational capacity. This committee oversees leadership, policy direction and prioritises resources to support the delivery of LAWPRO's strategy and work programme. It also ensures good governance and accountability in the implementation of the programme and compliance with relevant public policies, procedures and processes.

The Regional Committees and the LAWPRO Oversight Committee work closely with the County and City Management Association (CCMA) and its structures to embed WFD work within the overall management focus of local authorities at the most senior level. This includes the Transport, Infrastructure and Networks and the Environment, Climate and Circular Economy Committees.

Enhanced support and governance arrangements in the CCMA

Research funded by the EPA and undertaken by the IPA was carried out at the end of the 2nd RBMP in relation to the various structures and governance arrangements. One of the findings of the review was the need for enhanced structures and governance arrangements within the Local Authority sector, necessary to support the implementation of obligations provided for in the WAP and the WFD. Many of the recommendations have been adopted within WAP 2024, but all recommendations should be kept under review by the local government sector.

In addition, improving governance is also being addressed by the **County and City Management Association (CCMA)** through 8 committees focusing on policy areas of local government. Two committees, the **CCMA Environment, Climate and Circular Economy (ECCE)** committee, and the **CCMA Transport, Infrastructure and Networks (TIN)** committee, both are relevant in terms of the water environment, and they both consider and examine issues and policy matters under its respective headings.

The **ECCE Committee** addresses a wide range of policy areas across environment, climate, and circular economy as follows:

- For the area of water, water quality management, the River Basin Management Plan and Water Framework Directive, the ECCE committee has established the Natural Waters sub-committee (i.e., **Water Quality Oversight Group**) to assist in its work.
- Climate-related activities focus on implementing the national Climate Action Plan, supporting local authority climate strategies, resourcing climate roles, and coordinating regional efforts through Climate Action Regional Offices.
- In the area of circular economy, it supports waste planning, prevention, regulation, and enforcement, with oversight of shared services like the National Waste Collection Permit Office and Regional Waste Management Planning Offices.

The **TIN Committee's** main strategic focus areas for its current term, covering transport, infrastructure, and networks is as follows:

- Key transport policies include implementing the national Road Safety Strategy and securing access to collision data.
- Infrastructure priorities involve managing the **transition of water services to Uisce Éireann, the Local Authority Rural Water functions**, overseeing public lighting upgrades, and enforcing road opening licensing.
- Network-related activities focus on broadband rollout, preparing for the Gigabit Infrastructure Act, and coordinating utility installations. The committee also plays a central role in climate-related infrastructure planning, including high-voltage cable deployment and public lighting asset management.

In addition, the **Water Services Transition Office (WSTO)** works with the Local Authority sector, the Department of Housing, Local Government and Heritage, Uisce Éireann, National Unions and other stakeholders, supporting the implementation of government policy on the transition of water services to Uisce Éireann. The Water Services Transition Office (WSTO) plays an active part in managing the change process representing the interests of local authorities and staff. WSTO has a key role in coordinating and leading the involvement of local authorities on a range of matters, including financial analysis, HR matters, legacy issues, Cooperation Change agreements, Service Support Agreements and transition planning, all of which are critical to the management and delivery of the transition from local water service authorities to Uisce Éireann.

Local Authorities have a long history in water services, and this committee works closely with the LGMA Water Services Transition Office, the Local Authority Waste Programme Office and Uisce Éireann (UÉ). With the ending of the Master Cooperation agreement between the Local Authority sector and UÉ in 2026, ongoing engagement, cooperation and collaboration will be essential to effectively manage the public water, wastewater and surface water networks. The TIN committee oversees the Local Authority Rural Water functions and has a representative on the DHLGH Rural Water Working Group.

In light of the role and responsibilities of WSTO it is important that the Water Quality Oversight Group would liaise with WSTO in the development of any future business cases for LA resources to ensure that all the remaining water related LA sector functions, following transition, are adequately resourced.

Given the linkage between Local Authority functions in relation to surface water management, rural water, drinking water source protection, and complementary Local Authority functions under the WFD, ongoing interaction between the ECCE and TIN committees is essential.

The Water Quality Oversight Group is made up of Chair: Chief Executive from ECCE Committee, two Directors of Service, additional Directors of Service who are current Chairs of Regional Water and Environment Operational Committees, a Senior Official from LGMA and Director of Service LAWPRO. It will become the main point of contact between the CCMA and DHLGH in relation to natural waters and be the common voice for Local Authorities with the EPA. It will review and oversee Local Authority action in natural water protection, review implications of national plans and programmes and advocate for necessary resources for the Local Authority sector amongst other things. This Oversight Group is the Project Board to oversee implementation of the *Review of Local Authority Natural Water Functions and Resources Business Case* (PMO 21/07) and *LAWPRO Business Case* (PMO 24/01) and provides the oversight for bringing these Business Cases through the PSROG process.

PMO 21/07 proposes the provision of a **Natural Water Project Office** reporting to the ECCE committee via the Water Quality Oversight Group. Proposals are under consideration for this new coordination office, which will ensure enhanced alignment across the CCMA structures and the local government sector, and will support implementation of the LA water functions. There is ongoing consultation with the LGMA, as they are currently undergoing a strategic review, which may further influence this proposal.

The role of the Natural Water Project Office would be to:

- Support the CCMA Water Quality Oversight Group,
- Lead on the development of a Resources Implementation Plan,
- Support the identification of future resource requirements, and
- Coordinate the existing water functions of Local Authorities and ensure representation on committees and working groups.

Similar to the Water Services Transition Office and the Local Authority Waste Programme Office, the Natural Water Project Office would provide the linkage between the existing governance, oversight, co-ordination and support structures (as illustrated in Figure 3). It would fulfil a secretariat role for the Water Quality Oversight Group, preparing policy papers on any proposed new regulations and guidelines, monitoring government and EU policy, carrying out research at the request of the committee and actioning decisions of the committee. It would also play a pivotal part in the preparation of a **Local Authority Resource Implementation Plan** for PMO 21/07.

Currently there are new regulations and guidelines being developed in several areas including, but not limited to, bathing waters, recast drinking water directive (particularly around source protection), hydromorphology, and shellfish protection. Some of these will have future resource implications for Local Authorities and therefore the establishment of the Water Oversight Group under the ECCE committee, serviced by the Natural Waters Office, would provide an opportunity to move from reactive responses to more proactive responses on behalf of the sector.

This review recommends that the Natural Waters Project Office be established as a matter of urgency to support the Water Quality Oversight Group in the coordination of local authorities' activities and to advocate for additional resources, where necessary.



Figure 3: Linkages proposed for the Natural Water Project Office (PMO/21/07)

Other Governance Arrangements

The **Environmental Protection Agency (EPA)** plays an important role in the oversight and coordination of Local Authority natural water functions. The EPA has set 20 National Enforcement Priorities (NEPs) for a three-year period under four themes: Waste, Water, Air & Noise, and Governance Processes. These are reviewed and agreed annually by the environmental regulatory bodies. Each NEP is assessed against a set of specified criteria and then allocated a score according to a four-point scale: Excellent, Strong, Moderate or Limited. The EPA also sets targets and monitors the progress of Agricultural and Domestic Wastewater Treatment system inspections. Through the *Recommended Criteria for Environmental Inspections* (RMCEI) Local Authorities set out their inspection plan for the water enforcement area and report on progress against those targets in their annual reporting. The EPA evaluates and assesses Local Authority performance and reports their findings in the '[Environmental Enforcement Performance of Local Authorities](#)'.

Local Authorities are the Supervisory Authority for private drinking water supplies and are responsible for the development and implementation of compliance monitoring programmes. The EPA play an important role in compiling and [reporting on the results](#) provided on private drinking water supplies by local authorities on an annual basis. They also provide support and guidance to local authorities by developing information notes and guidance documents in relation to their legislative functions under the [Drinking Water Regulations 2023](#). The EPA are named as one of the authorities on drinking water source protection along with local authorities in schedule 6 of these regulations.

The **National Oversight and Audit Committee (NOAC)** report on performance against agreed indicators across Local Authority functions. Measurement of performance of Local Authorities could be further supported by the work of the NOAC where data on agreed indicators for water would be verified as part of the NOAC annual assessment process.

3.2 Local Authority Sector Role and Responsibilities

Individual Local Authorities

In all there are 24 Local Authority functional areas with relevance to water quality as set out in Table 2 below. A review of each area was carried out for the 2015 Local Authority Staff Resources Required to Deliver WFD Environmental Objectives Business Case, (CCMA, 2015) and updated as part of work undertaken under the Natural Waters Business Case (PMO 21/07). This information will be a valuable resource for any wider strategic review on Local Authority water functions.

It is a legal requirement for Local Authorities to implement Basic Measures to restore and protect water quality, as set out in the Water Action Plan. Catchment science and management underpin the prioritisation and the targeting of these measures. The day-to-day implementation of Local Authorities to deliver compliance with basic measures, e.g., **monitoring, inspections, assessment, investigations, remediation and enforcement** has to date focused on water bodies that are at less than Good Status, i.e. Restore objective. The WAP proposes that in addition to the implementation of basic measures that Local Authorities increase their focus on the protect objective to ensure that there is no deterioration in waterbodies already at good or high status.

Local Authorities have a significant **enforcement role** (Table 2), which includes compliance promotion, inspection, cross reporting and issuing of advisory notices and ultimately prosecution. Local Authorities have good experience of enforcement through the courts in environment and planning, with local legal services, in house or external, to guide staff through the process.

Local Authorities are a key partner in the delivery of the **rural water programme** and have played a significant role in addressing water quality issues in the sector over the past 30 years. Local Authorities are the supervisory authority for private drinking water supplies including private Group Water Schemes and have significant statutory and supporting functions for the rural water sector.

To ensure appropriate targeting of local authority action, it is proposed in the Water Action Plan 2024, that Local Authorities prepare a **LA Water Action Work Plan**. The plan will set out the actions assigned to each local authority to protect and restore water quality in Ireland. These plans will outline the Local Authority roles and responsibilities in terms of their WFD obligations and will support better alignment with RMCEI reporting. The plans will include detail on the activities currently reported under RMCEI, such as those carried out under the National Agricultural Inspection Programme, as well as other activities carried out to protect the water environment. LAWPRO is establishing a working group with membership from Local Authorities to design a template plan by Q4 2025 for full roll out in 2026. These plans will be public facing and will be integrated into the Catchment Management Work Plans that are informed by the Sectoral Action Work Plans. The LAs will set their targets and KPIs in the LA Water Action Work Plans and will track progress. Progress will be overseen by the Regional Committees, EPA and PDO.

Key areas of responsibilities for LAs include:

Area of responsibility	Key Focus Areas
Bathing Water	Monitoring, reporting, incident follow up and enforcement functions under bathing water regulations
Domestic Wastewater Treatment Systems (DWWTS)	Domestic Wastewater Treatment Systems inspections, follow up and enforcement National Inspection Plan for DWWTS.
Agricultural Inspections	Farm inspections, follow up and enforcement required under the Good Agricultural Practices regulations. National Agricultural Inspections Programme.
Pollution Complaints and Red Dot notifications	Reactive inspections and monitoring Red Dot notifications follow up
Wastewater discharge licensing	Section 4 licence review, monitoring and inspection. Unlicensed discharges.
Catchment Assessment to target enforcement activities	Gathers evidence to support the targeted of action based on water quality impact. Unknown pressure assessments Local catchment assessments including in Blue Dot catchments, protected areas and other sensitive receptors
Rural Water Programme	Supervisory authority over Private Water Supplies, including monitoring and reporting of private Group Water schemes and small private supplies Administration of grant schemes under the multi-annual rural water programme, Private Wells, Septic Tanks, Group Water Scheme Operational Subsidy Liaison support and advice
Urban Wastewater	Developer provided infrastructure Urban runoff management and Nature Based Solutions (NbS) Misconnections
Environmental /Water Reporting	Recommended Minimum Criteria for Environmental Inspections (RMCEI) EPA Local Authority Environmental Performance Assessment and the National Environmental Priorities (NEPs) National Oversight and Audit Commission (NOAC) Indicators Water Framework Directive – catchment characterisation, updating the WFD App
Support to Planning Section	Review of planning applications and forestry felling licences Review of Strategic Environmental Assessments, Appropriate Assessments, e.g., Freshwater Pearl Mussel Input into Part 8s and Part 10s of planning process
WFD Monitoring	WFD and Investigative monitoring and licence compliance monitoring Hydrometric monitoring station maintenance
Staff Training	Staff training through the Local Authority Services National Training Group
Other Complementary Local Authority Functions	Support to Climate Action Teams, Road and Infrastructure section, Biodiversity officers, waste enforcement etc. The LA Natural Waters Team also provides key supporting function to other LA functional areas.

Table 2: Local Authority areas of responsibilities, with relevant key focus areas

Local Authority Waters Programme

LAWPRO undertakes a range of functions on behalf of and alongside Local Authorities including:

- fulfilling the responsibility of the Local Authority sector for regional coordination, public participation, and support to the EPA and Minister in the development and implementation of the RBMP and Programme of Measures (POMs) as required under the [European Union \(Water Policy\) Regulations S.I. 350 of 2014](#),
- working on behalf of Local Authorities, delivering on the requirements of the WFD as is demonstrated through the 55 actions in the WAP where LAWPRO is leading or playing a significant supporting role (Appendix 6),
- as part of its coordination role, working with all stakeholders to adopt a catchment-based approach via the development of Catchment Management Work Plans and Sectoral Action Work Plans. The development of LA Action Work Plans will highlight the targeting of LA enforcement work to resolve water quality issues,
- build Local Authority capacity in integrated catchment management through delivery of Catchment Science and Management training,
- sharing of catchment and sub-catchment scale methodologies for significant issues and undertaking joint LCA assessments with Local Authorities in their Areas for Action,
- LAWPRO's community water officers provide community supports. This work has evolved from increasing public participation in water governance and public consultations to capacity building, linking and leveraging available resources and funding mechanisms. LAWPRO facilitates the provision of direct funding through three funding streams (€2.04 million in 2025), which supports engagement initiatives, promotes citizen science and water literacy, and the delivery of medium to large scale water quality outcome projects,
- providing secretariat role at Local Authority Liaison meetings, providing a forum for knowledge transfer through case studies and best practice examples and seeking to find solutions to problems arising,
- collaborating with LASNTG on the Water Quality Training Plan 2026-2030 and providing catchment science and management training,
- contributing to the development of the National Agricultural Inspections Programme, and,
- convening a working group to develop the template for the LA Water Action Work Plan.

Of particular note is LAWPRO's role in relation to Nature Based Solutions. The Water Action Plan 2024 identifies urban runoff as a significant contributory factor to waterbody quality and quantity pressures in Ireland. LAWPRO provides specialist support to Local Authorities in adopting international best practice on **Nature-based Surface (NbS) water management** within planning and infrastructure project delivery as follows:

- The DHLGH, supported by LAWPRO, and the CCMA published '*Nature-based Solutions to the Management of Rainwater and Surface Water Runoff in Urban Areas Water Sensitive Urban Design Best Practice Interim Guidance Document (2021)*' and '*Implementation of Urban Nature-based Solutions Guidance Document for Planners, Developers and Developer Agents*' in 2025.
- The DHLGH, supported by LAWPRO, is rolling out a series of NbS awareness training to Town Centre First Project teams, Local Authority Staff and Elected Members.

- LAWPRO is working closely with all Local Authorities to promote the use of NbS in Local Authority projects and are administering a €250,000 capital fund to support Local Authorities to deliver NbS demonstrator projects.
- This NbS work aligns with the objective and targets of the Nature Restoration Law.



Figure 1: Nature-Based Solutions Graphic from the International Union for Conservation of Nature (IUCN)

Engagements and Messaging on Water

It is important to note the Local Authority sectors key leadership role in the stewardship of water catchments and its engagement with communities on water. Deeply embedded in communities, the reach of Local Authorities goes far wider than their own functions with their extended role as the delivery body for Government Departments and agencies. This extensive engagement and reach take many forms including:

- LAWPRO Community Water Officers,
- LA Environment Awareness Officers/Climate Action Officers/ Biodiversity Officers,
- Rural Water Liaison Officers,
- Public Participation Networks,
- Local Community Development Committee,
- Strategic Policy Committees, and,
- Elected Representatives meeting at plenary, municipal district and committee levels.

Further, Local Authorities structures, engagement processes and communication capacities are well established, agile and most suitable as vehicles for engagement and communication.

With so many competing messages and topics, it is challenging to ensure that the key messages regarding water are consistently brought to the attention of citizens, communities and businesses operating at different levels in Local Authority areas. It is important that Local Authorities seek all opportunities to lead local, political and citizen engagements in relation to water issues and to intensify the use of their platforms including, but not limited to, arts, culture

and community functions in this regard. The establishment of **Catchment Community Fora** under the WAP may provide further opportunities to enhance engagements and consistency of messaging.

The sector needs to actively consider innovative approaches to messaging and engagements to attract and retain multi-generational interest in protecting water, ensuring that communities are informed and educated and thus increasing water literacy and citizen capacity building.

Local Government Sector Actions in the WAP 2024

In recognition of the critical role played by the Local Government Sector, it should be noted that a total of **76 actions** have been assigned to the sector in the WAP for delivery as the leading organisation. This includes 55 Actions assigned to LAWPRO, 14 Actions assigned to Local Authorities (13) and Local Government Sector (1), and 7 assigned to the CCMA. [Appendix 6](#) highlights some of the key actions for Local Authority Sector relevant to this report.

4. Local Authority Resource Gaps

The Water Action Plan (WAP) 2024, has a commitment that the Review of Local Authority Resources will be completed *‘with the aim of putting in place appropriate resources to support individual local authorities in fulfilling their role in water quality protection and restoration’*.

In addition to legal obligations on Local Authorities, the DHLGH is looking for more action on the ground and better reporting, while the EPA is looking for greater and more consistent use of enforcement. There is an acceptance that given the importance of water, water quality needs to be more deeply embedded within the Local Authorities and work in water quality be further integrated with other Local Authority functions.

An Interim Business Case addressing the resource issue to meet the EU requirements raised in its decision on the Nitrate Derogation was prepared by the Natural Waters Business Case project team and project board. The National Agricultural Inspection Programme NAIP set out the resource requirements for Local Authorities to carry out more farm inspections and to respond to EPA Directions to carry out a set number of farm inspections. Some 57 posts were approved, and recruitment is almost completed.

There are two open business cases in relation to local government resources required:

- Local Authority Natural Water Functions Business Case PMO 21/07 (section 4.1)
- LAWPRO Business Case PMO 24/01 (section 4.2)

The additional Local Authority functions which are not included in either business case above are presented in Section 4.3, which highlights resource gaps related to additional agricultural inspections, data management, training, the marine strategy framework directive, drainage and hydromorphology, rural water, urban wastewater, national laboratory strategy and WFD planning guidelines.

4.1 Local Authority Natural Water Functions Business Case PMO 21/07

PMO 21/07 seeks to provide the resources needed for Local Authorities to deliver existing and new obligations assigned under the WAP. The executive summary of the PMO 21/07 is included in [Appendix 7](#). The PSROG and EU infringements cases also refer to the need for Local Authorities to be resourced to deliver on their legal obligations and assigned actions. The recommended option within PMO 21/07 seeks an additional 86 staff – two to service the Natural Waters Project Office and 84 staff across local authorities. This Option will enable Local Authorities to establish a dedicated Natural Waters Team, with a staffing structure that will provide a career structure and support the professional development of staff, assisting with staff retention in the sector. These resources are in addition to those proposed for LAWPRO in a separate business case. The distribution of these Local Authority resources will be linked to the risks posed to water quality, the protected areas requirements and the pressures on the waterbodies within each Local Authority functional area, having regard to the existing resources.

As the functions undertaken by these teams are to ensure compliance with Ireland’s on-going legal responsibilities, it is recommended that both the tenure of the roles and their funding should be permanent. The tenure and long-term funding of these posts and the Agricultural Inspections posts is raised within this Business Case. A Service Level Agreement (SLA) is proposed to be agreed and signed between the Department of Housing, Local Government and Heritage and the Local Authorities, which would contain details of the funding commitment for Local Authorities in relation to the resources sought in this business case as well as those already provided for implementation of the NAIP.

The costings in this Business Case take account of the LGMA Business Case guidelines and include PSRI 11.25% of base pay (from Oct 2025), Pension is estimated at 13% of base pay as per C&AG Guidelines and 25% is applied to cover the overhead costs as per the revised RIA guidelines. PMO 21/07 uses the midpoint of the pay scale as required by the Public Spending Code. The total annual cost of this proposal is estimated to be in the region of €9,941,000.

On-going resource review

While the resources sought address known resource gaps in Local Authorities, the Water Quality Oversight Group and the proposed Natural Waters Office will need to keep natural water resourcing under constant review as matters evolve, and new obligations emerge. New opportunities may arise from new technologies such as the use of drones or other investigative techniques and as part of the Uisce Éireann Co-operation Agreement. Any new request for resources will be considered in accordance with the *'Step-by-Step Guidance on Departmental Engagement with the Local Government Sector report'* guidelines (in draft).

4.2 The LAWPRO Business Case (PMO 24/01)

Similar to that outlined for Local Authorities, the WAP 2024, includes an action that *'The CCMA will identify the appropriate level of resources and involvement of LAWPRO to meet WFD objectives up to 2027 and beyond in future RBMPs'*.

Reviews of LAWPRO, (one external and one commissioned by the DHLGH towards the end of Cycle 2) have deemed it successful in delivering on its strategic objectives and that investment in LAWPRO has been very effective. The work of LAWPRO needs to be continued and its resources strengthened into the 3rd Cycle to enable it to take on the additional workload assigned to it. LAWPRO is viewed as flexible and dynamic, which enables it to re-prioritise its works as and when there are changes in national priorities.

The LAWPRO Business Case (PMO 24/01) (Executive Summary in [Appendix 8](#)) seeks sanction for 33 additional posts (10 of these posts were sanctioned in 2025) to reflect the significant additional responsibilities assigned to LAWPRO in the WAP 2024 and to regularise staff contracts from fixed term to permanent. PMO 24/01 is undergoing a parallel process to the Local Authorities Natural Waters Resources business case, and they are integrally linked. The business case falls under the remit of the ECCE Water Quality Oversight Group. Once PMO24/01 is approved by PSROG, LAWPRO will prepare a Resources Implementation plan for the DHLGH to cover the period 2026-2027.

The total cost of the additional staff costs and overheads in 2026 is estimated to be in the region of €3,213,513. As mentioned above the costings in PMO 24/01 take account of the LGMA Business Case guidelines. An SLA is to be agreed and signed between the DHLGH and the Local Authorities (Kilkenny and Tipperary), which would contain details of the funding commitment for LAWPRO to support Local Authorities in implementation of the WFD and delivery of the River Basin Management Plan.

4.3 Local Authority Functions Not included in either Business Case

The PMO 21/07 and PMO 24/01 do not address a range of supporting and additional roles, which are set out in some level of detail below. There are three areas which are essential to be resourced and delivered as a priority for the effective delivery of Local Authority responsibilities in the WAP; agricultural inspections, data management and training. Other areas that need to be considered are also referenced.

Agriculture inspections

It is estimated that over 4,500 farm inspections are required annually to improve water quality and compliance with the GAP Regulations.

It should be noted that the Interim Business case (now complete) for Farm Inspection resources (57 staff) was an interim proposal in response to the EU Commission decision on Ireland's nitrate action programme developed at relatively short notice. It therefore only looked at agricultural inspections and did not include a compliance promotion programme to enhance collaboration with farm organisations, DAFM, Teagasc, and the EPA. It also did not look at hydromorphology issues related to agriculture, such as drainage or forestry. Additionally, the National Agricultural Inspection Programme (NAIP) focuses inspections in areas where water quality is 'At Risk' from agriculture and does not include for inspections in areas where water quality is achieving its objectives but needs to be protected from possible future deterioration. There may be therefore a gap in Local Authority resources to fulfil these additional requirements related to agricultural inspections.

National Information and Communications Technology (ICT) and Data Management System for Local Authorities

The current data management system across the Local Authority sector requires significant attention. Environmental data management in Local Authorities varies from paper only records to fully digital systems to a combination of both. Where digital systems exist, they are multi-platform, many different systems, with a mix of in-house and externally designed systems. The absence of a national system means that reporting is cumbersome.

A lack of adequate monitoring and compliance data inhibits the identification of what measures are required to reach water quality objectives. Good reliable data and analysis are key to providing a baseline against which information can be gathered, decisions taken and resources deployed. Furthermore, data is key to measuring agreed KPIs, proving outcomes and reviewing and informing priorities for implementation plans.

The CCMA Natural Waters Business Case Project Board proposed that a new Data Management System be progressed by the LGMA as part of the National Environmental and Management and Information System (NEMIS). A combined process should deliver better value for money for the public purse. A NEMIS project board specifically addressing the water aspects of ICT and data management is recommended to be established as a priority. The NEMIS project is now under the remit of the LGMA ICT Directorate and is being progressed jointly by EPA, DHLGH and CCMA.

Training:

Training was identified by the CCMA Natural Waters Business Case Project Board as a keystone requirement for the Local Authority sector. The sector currently has a well-established training resource in the form of the Local Authority Services National Training Group (LASNTG). The Environmental Services Training Group (ESTG), a sub-group of LASNTG, was formally requested to undertake a comprehensive assessment of water quality-related training needs of the Sector to deliver the objectives of the RBMP, in consultation with the EPA and LAWPRO.

This process led to the development of the 2025 Water Quality Training Needs Analysis (TNA), which provided a robust and evidence-based evaluation of system-level capabilities, thematic priorities and operational challenges. Following on from the 2025 Water Quality TNA Report, the LA Water Quality Training Plan 2026–2030 was prepared which sets out a nationally led, strategic approach to workforce development. It is designed to equip Local Authorities with the capabilities required to discharge their statutory water quality responsibilities with consistency, confidence and technical rigour.

The training plan reflects the increasing scope, complexity and urgency of water governance in Ireland, particularly against the backdrop of the 2023 Uisce Éireann transition (which redefined the regulatory and environmental responsibilities of Local Authorities nationwide).

Enforcement is a key focus area of the training plan, following reports by the EPA which highlighted low levels of enforcement by Local Authorities. Increasing training in enforcement will ensure staff have the capacity and confidence to take enforcement when necessary. The Training Plan has been approved by the ESTG and the costs for its delivery have been submitted to the DHLGH as part of the LASNTG 2026 budget estimates.

Other Local Authority Areas that need to be considered

Six additional areas have been identified that require further examination to determine if additional Local Authority resources are required. In most cases, the Local Authority function has not yet been clarified and therefore resources estimates are not currently possible. These areas should form the focus for the Water Quality Oversight Group and the proposed Natural Waters Project Office.

While additional resources are being sought for enforcement in PMO 21/07, the Water Quality Oversight Group should keep enforcement activity under review to ensure the sector has adequate resources for effective enforcement and consider if greater engagement is required with other enforcement agencies.

Rural Water Programme

A separate business case for the Rural Water Programme has been prepared and is under consideration by the CCMA and DHLGH. The ending of the Master Cooperation agreement with UE (end of 2026) provides opportunities for Local Government to enhance the delivery of its expanded functions under the 2023 Drinking Water Regulations through redeployment of Water Services staff, however, it is also accepted that several LA staff have moved to UÉ leading to a loss of expertise in the area. The CCMA has responded to the DHLGH and has highlighted concerns and the diverse views of its members. The Water Quality Oversight Group will need to liaise with the TIN committee to determine any resource implications of the re-examination of rural water functions of Local Authorities.

It is recommended that the Water Quality Oversight Group, in collaboration with the TIN Committee, review the resources required for the expanded Rural Water functions having regard to the Rural Water Business Case, the Drinking Water Regulations 2023 and ending of the Master Cooperation Agreement between UE and Local Authorities in 2026. The source protection requirements provide a clear link to the natural waters function within local authorities in that the implementation of measures within source protection areas will restore and protect drinking water source waters. This review should be urgently carried out to identify opportunities for redeployment of staff returning to local authorities and how best to use existing skills and expertise to address additional functions in the Rural Water sector.

Marine Strategy Framework Directive (MSFD)

The Local Authority resources required to implement the MSFD in transitional and coastal waters have not yet been determined or included in any business case. This will need to be kept under review by the Water Quality Oversight Group.

Resources allocated to the implementation of the Water Action Plan (actions to protect surface waters upstream and also the Aqua 4 Action in the WAP) will however have indirect benefits for transitional and coastal waters.

Drainage Districts and Hydromorphology

The DHLGH Policy Review Group have yet to complete the legislation review in respect to hydromorphology. Following this review the Water Quality Oversight Group will have to examine the outcome of these deliberations and associated recommendations to determine the associated Local Authority requirements.

Urban Wastewater, Run-off and Misconnections

A NIECE Working Group is to be established to review the resources requirements in this area. This will be informed by the Dublin Urban Rivers LIFE project. It is recommended that the Water Quality Oversight Group review the resources required having regard to the findings of the NIECE working group and end of the Master Cooperation Agreement between UE and Local Authorities in 2026. This review should be urgently carried out to identify opportunities for redeployment of staff returning to local authorities and how best to use existing skills and expertise to address areas such as misconnections.

Separately, the DHLGH will chair a multi-stakeholder group to oversee the remediation of the developer provided infrastructure by UE in a timely manner.

Monitoring and Maintenance

A National Laboratory Strategy has been prepared and is under consideration by ECCE committee (to include the function of this laboratory strategy).

In relation to hydrometric monitoring, discussions are required with the EPA to review the monitoring programme and what resources and funding will be required for Local Authorities in particular to maintain stations.

Both should be kept under review by the Water Quality Oversight Group to determine Local Authority functions and resources requirements.

WFD Planning Guidelines

There has been a significant delay in publishing the WFD Planning Guidelines, therefore the resources required by the Local Authorities have yet to be determined. Future developments in these areas should be kept under review by the Water Quality Oversight Group in the context of additional responsibilities and associated resource requirements.

5. Local Government Risks and Recommendations

As stated, the purpose of this report is to assist the CCMA and the LGMA to carry out a wider strategic review on the status of Local Government Sector Water Functions. The recommendations listed in this chapter are based on best available information and the gaps and opportunities identified throughout the report. The recommendations have been divided into three sections and prioritised based on their urgency and stage of progress.

5.1 Risks

This report has set out the status of water in the context of Local Authorities' roles and responsibilities, however, clarity is still required around some roles and responsibilities. The report reflects the importance and urgency needed for increased and sustained action in relation to protecting and restoring our water resources under the WAP. Failure to intensify our response now will likely lead to many, if not all, of the following risks.

The risk of failing to secure funding approvals

- It is imperative that approval for the 2 existing business cases outlined in this report is progressed urgently. Delays will impact on recruitment and progression of the various work streams which will have a direct impact on the success or otherwise of achieving targets and objectives as set out in the WAP.
- It is important that funding is provided on a long-term, multi-annual basis. Failure to provide this long-term security of funding will undermine the ability to plan for sustainable projects and programmes.
- In general, staffing approvals need to be for permanent posts. Failure to provide this long-term security of tenure of posts will undermine the ability to recruit and retain sufficient numbers of qualified and experienced staff. Further, short term contracts have very negative impacts on Local Authorities workforce planning and sustainability.

The risk of water quality not being a key corporate priority

- All stakeholders, as detailed in the WAP, have joint and individual responsibilities in the context of organisational culture and awareness. Consideration of responsibilities in relation to water resources should be prioritised and mainstreamed in all Local Authority functions, internal messaging and corporate objectives. Failure to harness this organisation-wide support for water quality will result in missed opportunities to achieve objectives without necessarily increasing funding requirements.
- The Local Authorities Natural Water Resources Business Case (PMO/21/07) is seeking approval for water teams for each Local Authority. Should same be granted, it will be important that recruitment is carried out quickly and that the new team is readily embedded and integrated into the "LA family" to influence other functional areas.
- Failure to establish the Natural Waters Project Office will also impact delivery of this priority.

The risk of ineffective and inconsistent communication of water objectives

- Public messaging by Local Authorities should re-enforce the importance of water quality to the economy and communities. Failure to consistently relay this message will undermine progressive and sustainable economic, societal and community support for the many measures to be taken.
- Messaging should also explain to the wider public their role in relation to water quality and the steps that can be taken by them in their daily lives to support same. Failure to

promote consistent messaging will result in water quality issues being replaced by other messaging.

The risk of not using all available measures and collaborations to achieve results

- While the focus of water quality objectives is to seek co-operation and support in communities for changes to how we live, work and play, it is accepted that there will be occasions where the range of enforcement tools will need to be deployed. At organisational and political level, it will be important that when such measures are utilised, there will be support for same.
- At national level, there is now a 'Whole of Government Approach' to addressing water quality. At national and local level, ineffective collaboration between agencies, including sharing of data, will most certainly impact on the effective use of resources and the efficient implementation of actions. The WAP has put in place structures at three levels, and it is imperative that stakeholders involved in those structures commit to and prioritise their role.
- It is important that resources and programmes have the capacity to be agile and flexible to respond to changing priorities. Failure to adapt quickly to changing circumstances will result in poorer outcomes in results.
- Failure to properly integrate Rural Water with Natural Water functions will result in a missed opportunity to build on successful collaborative projects to date and build further efficiencies into Local Authority functions

The risk of failing to fully achieve the objectives of the WAP

The risk of continuing to fail to fully achieve the objectives of the WAP and the legal requirements of the WFD will lead to the following significant reputational, environmental, economic and community damage:

- On-going deterioration in some or all our water bodies with the associated environmental devastation.
- Legal action at EU level which may lead to very significant fines to be paid by the Irish Government. Such resources will then not be available for progressive programmes.
- Further significant challenges and costs to providing potable water supplies to all our population and businesses with resulting community, economic and health concerns.
- Loss of Ireland's 'Green Image' with associated damage to our economy, including those areas of highest economic value e.g. agriculture, food production and pharmaceutical industries.
- Loss of the attractiveness of Irelands water resources as a tourism product, impacting significantly on our water-based tourism.

5.2 Priority Next Steps

- The Water Quality Oversight Group to take account of the recommendations in this report when developing an integrated strategy for the sector to best deliver all Local Authority water functions.
- Representation to be appointed from the TIN Committee to the Water Quality Oversight Group to ensure an integrated approach to LA Water Functions.
- Provide clarity on the roles and responsibilities of the existing and future water related functions of local authorities, e.g. residual water services functions through discussion between WSTO and the DHLGH.

- Investigate opportunities for redeployment and up skilling of staff previously working in Water Services to support other LA water related functions, e.g. misconnections, rural water and NbS.
- To progress Business Case PMO 21/07 (Natural Waters) and PMO 24/01 (LAWPRO):
 - Water Quality oversight Group and ECCE Committee to consider and approve
 - PSROG to consider and approve the Current Business Case PMO 21/07 and the LAWPRO Business Case PMO 24/01 to address the identified resource issues
 - DHLGH and DEPR to consider and approve both business cases
 - CCMA to consider and approve a Service Level Agreement between Local Authorities and DHLGH for resources sought in PMO 21/07 (including interim business case for NAIP) and PMO 24/01.
- LAWPRO to prepare a Resources Implementation Plan for PMO 24/01 and SLA documentation for agreement with the DHLGH.
- The Natural Waters Project office:
 - to be established as a matter of urgency,
 - to prepare a Resources Implementation Plan for PMO 21/07, including SLA documentation for agreement with the DHLGH.
- This current status report to inform the work programme of the Water Quality Oversight Group and the proposed coordination office.
- The Water Quality Oversight Group to establish, in coordination with the LGMA ICT function, a project board for the NEMIS (Water) data management system.
- The DHLGH fully fund the implementation and delivery of the Local Authority Water Quality Training Plan 2026–2030, which sets out a nationally led, strategic approach to workforce development.
- The output from the NIECE Misconnection and Urban Runoff Working Group to inform the Water Quality Oversight Group in terms of the resources required and future training needs.
- A decision on Local Authority involvement in the future of Rural Water to be concluded as a matter of urgency by the DHLGH having regard to the considerations of this review and the importance of the rural water function as a key community and economic driver in rural areas.
- The Water Quality Oversight Group and the proposed Natural Water Project Office:
 - to consider the items identified as part of this status review in the context of developing their work plan,
 - to ensure effective communication within established local government structures to facilitate timely sharing of information regarding water related issues.

5.3 Priorities for Improving Interconnectivity of Service Delivery

- Sector to consider potential to further integrate and prioritise water in all local government policies.
- Sector to consider potential to further integrate NbS into Local Government operations, planning and development.
- Investigate opportunities for greater interconnection of Local Authority Rural Water functions as part of the Natural Waters programme. Potential for Uisce Eireann to take a more active role in taking in charge Developer Provided Infrastructure projects.
- Local Government to intensify the use of their many platforms in the context of arts, culture and community functions to inform and educate communities, thus increasing water literacy, capacity building and understanding.

- Regional Committees and the LAWPRO Oversight Committee to work closely with the CCMA and its structures to embed Water Framework Directive work within the overall management focus of Local Authorities at the most senior level.
- Continue and intensify the holistic approach to all Local Authority water related functions having regard to the sectors responsibilities in terms of climate adaptation, climate mitigation and biodiversity and further, in the context of Local Authorities role in community and economic development.

Appendix 1 - Summary Table of EU Directives Directly Linked the WFD

Directive title	Summary objectives
<u>Groundwater Directive (2006/118/EC)</u>	Protects against pollution and deterioration in groundwaters.
<u>Drinking Water Directive ((EU) 2020/2184)</u>	Defines essential quality standards for water intended for human consumption. Directive recast in 2020
<u>Bathing Water Directive (2006/7/EC)</u>	Aims to enhance public health and environmental protection by setting out provisions for the monitoring and classification of bathing water and providing relevant public information.
<u>Environmental Quality Standards Directive (2008/105/EC)</u>	Establishes limits on concentrations of priority substances which present a significant risk to, or via, the aquatic environment.
<u>Urban Waste Water Treatment Directive (91/271/EEC) https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:01991L0271-20140101&recast_directive_2024/3019</u>	Aims to protect the environment from the adverse effects of discharges from urban wastewater plants and from industry. Directive recast in 2025
<u>Nitrates Directive (91/676/EEC)</u>	Aims to protect waters from nitrates arising from agricultural sources, as may pollute drinking water sources and groundwater leading to surface water eutrophication.
<u>EU Floods Directive (2007/60/EC)</u>	Aims to reduce and manage the risks posed by floods to human health, the environment, infrastructure and property.
<u>EU Marine Strategy Framework Directive (2008/56/EC)</u>	Aims to protect the marine ecosystem and biodiversity upon which our health and marine-related economic and social activities depend.
<u>Birds (2009/147/EC) and Habitats (92/43/EEC) Directives</u>	Both directives form the cornerstones of EU biodiversity policy and provide a strong legislative framework to protect the most valuable and threatened biodiversity.
<u>Strategic Environmental Assessment (SEA) Directive (2001/42/EC) and Environmental Impact Assessment Directive (2014/52/EU)</u>	Aims to ensure that environmental considerations are taken into account to promote sustainable development when planning, preparing, adopting and implementing certain public and private plans, projects and programmes.
<u>Major Accidents (Seveso III) Directive (2012/18/EU)</u>	Seeks to prevent major industrial accidents involving dangerous substances and to limit the consequences of such accidents on people and the environment.
<u>Sustainable use of Pesticides Directive (2009/128/EC)</u>	Aims to achieve sustainable use of pesticides to reduce the risks and impacts of pesticide use on human health and the environment and promoting the use of Integrated Pest Management and alternative approaches or techniques.
<u>Industrial Emissions Directive (2010/75/EU)</u>	Aims to minimise pollution from industrial activities by setting stringent emission limits and promoting best available techniques.

Appendix 2 – Summary of Local Authority Sector Water Related Responsibilities in Irish Legislation and Associated EU Directives

EU Directive	National Legislation	Responsibilities for Local Authorities (non-exhaustive) and Supporting actions
Water Framework Directive (2000/60/EC)	S.I. No. 722/2003 and associated amendments S.I. No. 350 of 2014 S.I. No. 166 of 2022	Local Authorities • implement the Programme of Measures (POMs) as assigned to LA. • exercise its functions to achieve compliance with the supporting Directives and regulations listed below. • assist with the preparation and publishing of river basin management plans • chair and participate in the regional committees • carrying out WFD water quality sampling • maintenance of hydrometric stations. Clarity required on LA functions. LAWPRO • assist with the preparation and publishing of river basin management plans • act as coordinator of plans implementation through the regional committees • take action to Implement RBMP ○ active participation ○ consult, co-operate and liaise with other public authorities ○ provide information ○ encourage the active involvement ○ review and update the mapping & analyses with EPA • implement the programme of Measures as assigned to LAWPRO
Groundwater Directive (2006/118/EC)	S.I. No. 41/1999 S.I. No. 9/2010 And associated amendments up to S.I. No. 51/2025	• S.I. No. 9/2010 groundwater functions linked to RBMP (722/2003 - local authority coordinating role) • local authorities established as enforcement authorities. All public authorities required to promote compliance with regulations and take all reasonable steps prevent, protect, enhance groundwater through implementation of RBMP programmes of measures., e.g. Section 4 licensing of discharges to groundwater is the responsibility of LA. • ensure protection of the quality of groundwater to reduce the level of treatment required for drinking water. • implement POMs assigned to LA. • engagement with the EPA on coordination and inclusion in RBMP • establish (with others) surveillance, operational or investigative monitoring programmes

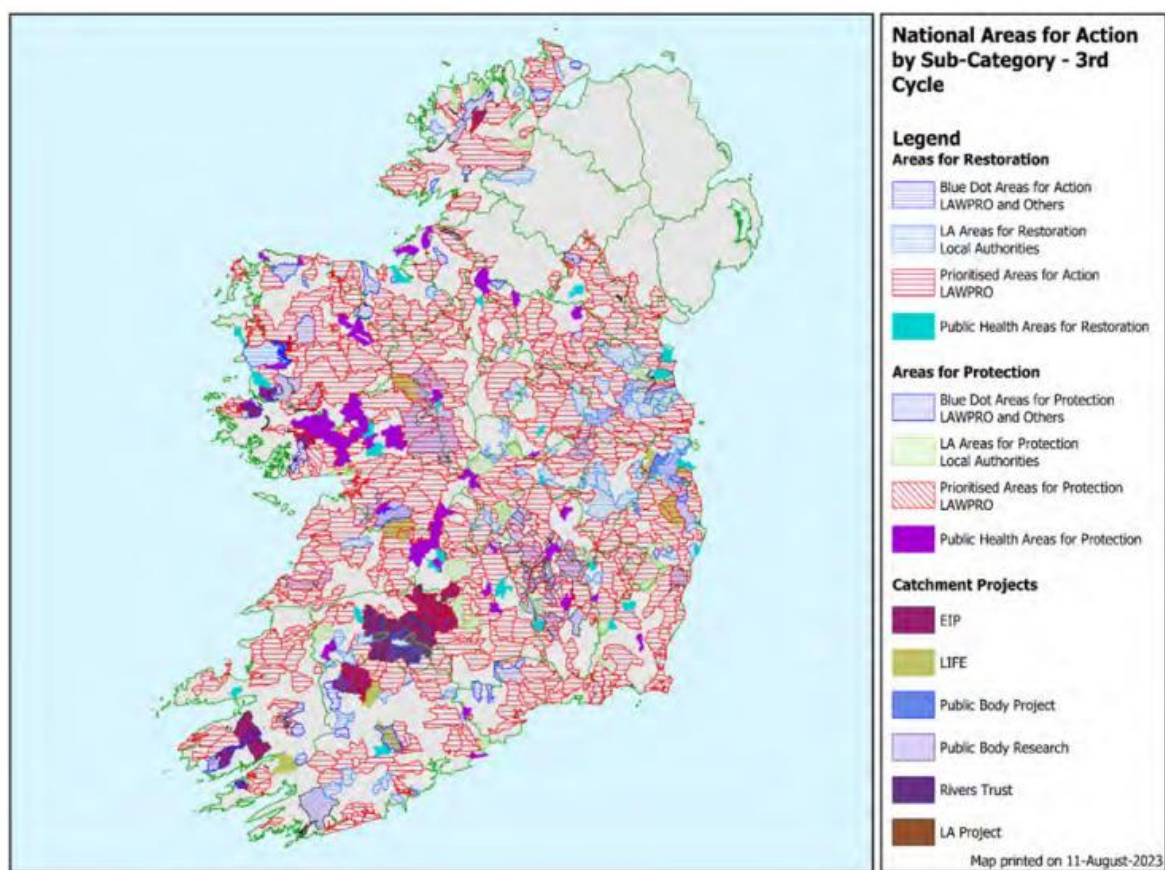
<u>Drinking Water Directive 2020/2184</u> (recast of original directive <u>98/83/EC</u>)	<u>Act No. 30/2007</u> Water Services Act & associated amendments up to <u>S.I. No. 116/2024</u> Drinking water Regulations <u>S.I. No. 439/2000</u> & associated amendments up to <u>S.I. No. 99/2023</u>	• LA established as water service authorities. Amendment in 2013, 2014 to facilitate establishment of Irish Water (UE) and reference to LGMA functions. • LA responsible for establishment of compliance and investigative monitoring programmes and reporting to the EPA • LA established as Supervisory Authority for private drinking water supplies specific additional functions for: ○ creating & maintaining a register for private supplies ○ compliance and investigative monitoring ○ Drinking Water Source Protection – oversight, support, coordination and undertaking of catchment risk assessment & risk management ○ Individual water supplies - private wells
<u>Bathing Water Directive (2006/7/EC)</u>	European Communities (Quality of Bathing Water) Regulations <u>S.I. No. 84/1988</u> & associated amendments up to <u>S.I. No. 322/2024</u>	• LA are responsible for managing and monitoring bathing water quality and providing information to the public on water quality during the summer bathing season (1st June – 15th September) • prepare a Bathing Water Profile for each identified bathing water • provide and maintain facilities and infrastructure and are responsible for safety at bathing water locations. • provide up to date information on bathing water quality at designated sites including the operation of a Prior Warning system of issuing notices • investigate any failures in bathing water quality • provide monitoring information to the EPA • member of the National Bathing Water Expert Group (BWEG)
<u>Environmental Quality Standards Directive (2008/105/EC)</u>	European Union Environmental Objectives (Standards For Monitoring of Quality Elements) Regulations <u>S.I. No. 277/2016</u>	• local authorities not referenced specifically but must adhere to standards established for water quality when issuing discharge licences and in planning decisions
<u>Urban Waste Water Treatment Directive (91/271/EEC) & recast directive 2024/3019</u>	Historically - <u>Local Government (Water Pollution) Act 1977</u>, as amended in <u>1990</u> and other associated amendments. <u>Act No. 30/2007</u> Water Services Act & associated amendments.	• local authorities historically responsible for monitoring, compliance and enforcement of discharges to the environment from wastewater treatment plants • existing responsibilities stem from the Water Services Act and are related to the master cooperation agreement with UE • Water Services Transition Office established within LGMA • LA continues to be responsible for urban runoff and surface water network, misconnections identified as a significant pressure on water quality

	Related - Domestic Wastewater: S.I. No. 223/2012 - Water Services Acts 2007 and 2012 Domestic Waste Water Treatment Systems (Registration) Regulations S.I. No. 220/2012 and associated regulations up to S.I. No. 562/2023	- local authority sector is represented on the expert group established to transpose recast directive into Irish Legislation - New UWWD includes increased proposed commitments for local authorities in the development of Integrated Urban Wastewater Management Plans - Hold a register of domestic wastewater treatment systems (septic tanks) (Protect Our Water LGMA register) - Inspections and performance standards. EPA's National Inspection Plan 2022-2026 requires local authorities to complete a minimum of 1,200 inspections annually, targeted near rivers and in areas where septic tanks are co-located with household drinking water wells - Closing out of Advisory Notices is a National Environmental Priority - Administration of Domestic Wastewater Treatment Systems Grant Schemes
Nitrates Directive (91/676/EEC)	European Communities (Good Agricultural Practice for Protection of Waters) Regulations S.I. No. 788/2005 and associated amendments and regulations up to S.I. No. 42/2025 Related - Waste Management (Use of Sewage Sludge in Agriculture) Regulations, S.I. No. 148/1998 amended S.I. No. 267 /2001	- the EPA, in consultation with the CCMA and other relevant bodies, developed the National Agricultural Inspection Programme (NAIP) to protect water quality for the period 2023 to 2025. The NAIP has been established and is currently being rolled out by local authorities - local authorities plan, target and undertake 4500 agricultural inspections annually under NAIP excluding follow up inspections and inspections carried out on foot planning applications, incidents and complaints - LA work with the DAFM to enforce cross compliance - take prosecutions where non-compliance fails to be resolved - local authority also has a role in assessing planning application for agricultural developments - local authorities to maintain a "sludge register" and holder to ensure that the spreading is in line with a nutrient management plan
EU Floods Directive (2007/60/EC)	Arterial Drainage Act No. 3 of 1945, was amended in 1995 by Arterial Drainage (Amendment) Act No. 14 of 1995 Transposed in 2010 S.I. No.122 of 2010	- LA, through Drainage Committees were charged with responsibility to maintain Drainage Districts under the Arterial Drainage Act, 1945. - Some LA continue to carry out maintenance work. - WAP Hymo 1: recommendations on the structure of an appropriate regulatory

	And amended in 2015 by S.I. No. 495 of 2015	framework/regime may have implications for LA functions in this area. • Incorporated as part of local authority planning functions • Consideration for LA development of land use plans
EU Marine Strategy Framework Directive (2008/56/EC)	European Communities (Marine Strategy Framework) Regulations S.I. No. 249/2011 and associated amendments and regulations up to S.I. No. 362/2025	• the Marine Strategy Framework Directive (MSFD; Directive 2008/56/EC) is the main legislation used to ensure that our seas are clean, healthy, biologically diverse and sustainably used • new Maritime Area Regulatory Authority (MARA) established • LA carry out protect function through consideration of the Maritime areas in their county development plans, awareness campaigns and litter management plans • Where relevant Local authorities prepare and implement Port and Harbours Waste Management Plans • Coastal LA prepare <i>Oil Pollution Spill Contingency Plans and a Hazardous & Noxious Substances Spill Contingency Plans</i> under the Sea Pollution Act, 1999-2006 • Impact of the Marine Spatial Plan and the work of MARA to be reviewed to determine potential additional resource requirements.
Birds (2009/147/EC) and Habitats (92/43/EEC) Directives	Planning, Heritage and Broadcasting (Amendment) Act No.11 of 2021 European Union (Birds and Natural Habitats) (Sea-fisheries) Regulations S.I. No. 290 of 2013 and associated amendments and regulations up to S.I. No. 293 of 2021	• Incorporated as part of local authority planning functions to ensure that their actions or decision do not negatively impact designated sites. • Before granting permission for a plan or project (including their own) LA must consider the Appropriate Assessment requirements. This obligation stems from Article 6(3) and 6(4) of the Habitats Directive and is mirrored in Part XAB of the Planning and Development Act 2000. • Certain activities require prior consent from NPWS and LA have a role to ensure such consent is obtained.
Strategic Environmental Assessment (SEA) Directive (2001/42/EC)	For a specific range of land-use plans, S.I. No. 436 of 2004 as amended by S.I. No. 201 of 2011 For all other plans and programmes S.I. No. 435 of 2004 as amended by S.I. No. 200 of 2011 Planning and Development Act No. 34 of 2024	• LA must determine if a plan or programme is likely to have significant environmental effects, e.g. ○ Development Plans ○ Local Area Plans ○ Regional Spatial and Economic Strategies ○ Planning Schemes for Strategic Development Zones

<u>Environmental Impact Assessment Directive (2014/52/EU)</u>	<u>S.I. No. 296 of 2018</u> Planning and Development <u>Act No. 34 of 2024</u>	• Incorporated as part of local authority planning functions, providing for EIA screening, scoping of EIA report, assessment of the EIAR, public participation and the EIA to inform the planning decision
<u>Major Accidents (Seveso III) Directive (2012/18/EU)</u>	Planning and Development <u>Act No. 34 of 2024</u>	• Incorporated as part of local authority planning functions considering the following: Land use planning; consult with HSA and EPA when assessing planning applications near SEVSO sites; ensure public aware of SEVSO sites; and involvement in external emergency plans
<u>Sustainable use of Pesticides Directive (2009/128/EC)</u>	European Communities (Sustainable Use Of Pesticides) Regulations <u>S.I. No. 155/2012</u>	• LA has responsibilities to reduce the risks and impacts of pesticide use on human health and the environment especially where LA apply plant protection products (PPPs) in public spaces.
<u>Industrial Emissions Directive (2010/75/EU)</u>	European Union (Industrial Emissions) Regulations <u>S.I. No. 138/2013</u>	• LA to support the EPA as the competent authority for licensing under IED by assisting in the identification of operators that fall under the scope of IED and consult with EPA on proposed planning applications involving IED activities.

Appendix 3 - Map of 517 Areas for Action in Water Action Plan 2024



Appendix 4 – WFD Governance and Implementation Structures

The WAP provides a three-tiered approach to governance and implementation which was established during the first and second RBMP cycles. This is detailed in chapter 6, pg. 74 of the [Water Action Plan 2024](#).

The second RBMP cycle entailed a complete change of approach to the overall river basin management planning process compared to the first-cycle. The following three-tier structure (Figure 28 from the Water Action Plan 2024 illustrated below) was adopted across the relevant implementation bodies.

Figure 28: High Level Implementation Structures

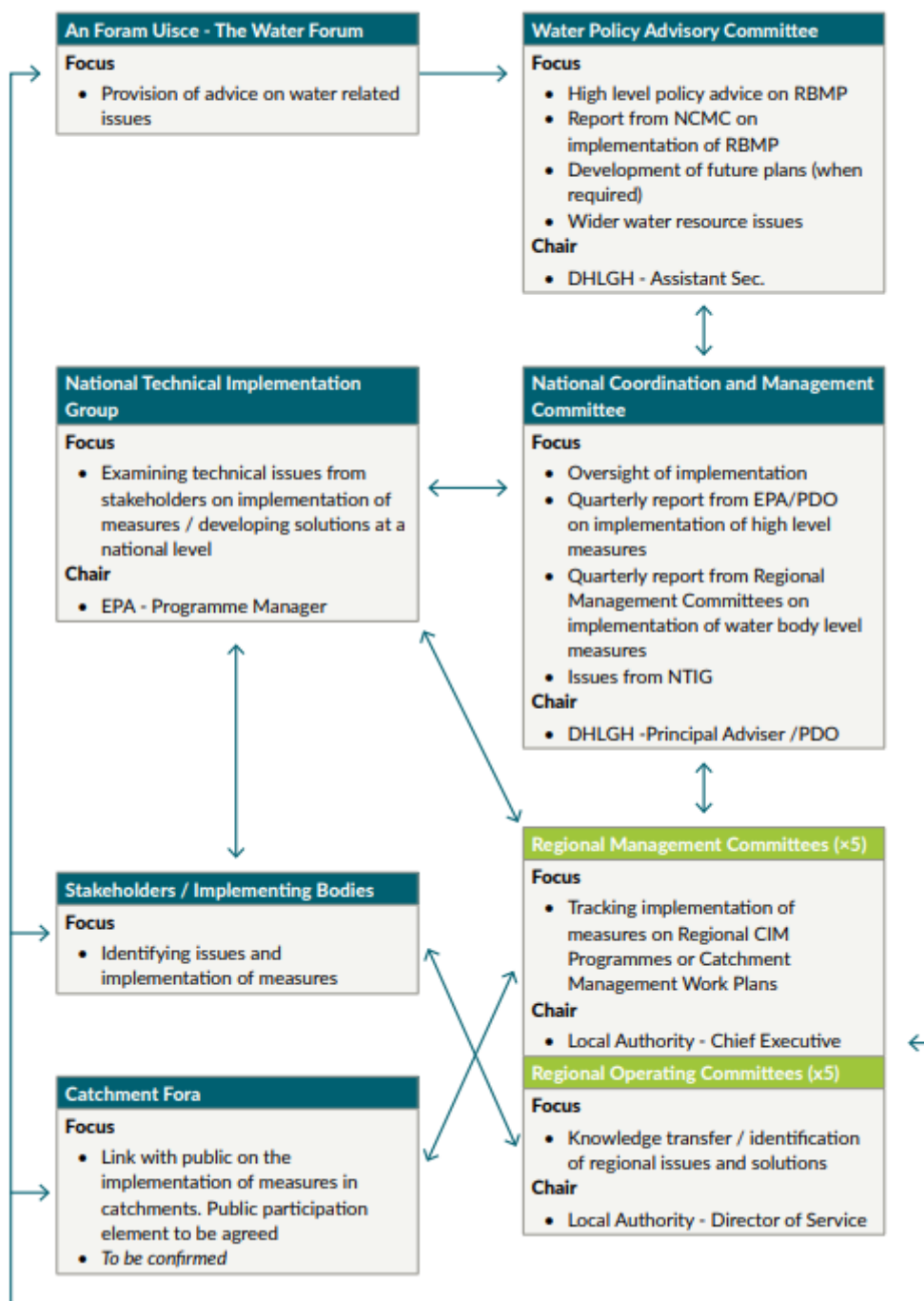
Tier 1 National Management and Oversight	Minister for Housing, Local Government and Heritage	Policy, necessary legislation and ensuring appropriate resourcing of the Plan across Government Departments. Supported by the cross-government Water Policy Advisory Committee established to advise the Minister.
Tier 2 Technical implementation and reporting	Environmental Protection Agency (EPA)	The catchment characterisation process, overseeing the national monitoring programme, chairing the National Technical Implementation Group and assisting and advising the Minister.
Tier 3 Regional Implementation	Local authorities	Each local authority with the support of the LAWPRO shared service is responsible for co-ordinating the implementation of measures within its functional area. This includes the direction of implementing bodies.

The WAP states:

‘While the working arrangements are set out formally, the successful implementation of the plan will require integrated and co-operative working relationships between stakeholders. During the third-cycle, the implementation structures will be developed to build on what has been learned during the previous two cycles’.

Figure 29 from the Water Action Plan 2024 (illustrated below) shows the enhanced working arrangements and roles for the third-cycle.

Figure 29: WFD Implementation Structures and their Interactions



Appendix 5 – Drivers for enhanced actions in relation to water quality

Aside from legislative, policy provisions and plans, there are a number of other important drivers for enhanced actions in relation to water quality. These include, but are not limited to, the following:

Infringement cases in Europe

Ireland's failure to deliver on its obligations under the Water Framework Directive and its related Directives carry significant risk to Ireland's reputation and "green image", and of further sanctions, including economic, with potential for significant direct impact on our agriculture sector and indirectly on the wider economy. Despite the work to date Ireland has several open infringement cases pending in Europe including:

- 2025 Formal Notice: Non-conform transposition of the **Drinking Water Directive** into Irish legislation.
- 2024 Formal Notice: Bad application of Council Directive 91/271/EEC on **urban wastewater treatment (UWWT)** in Ireland.
- 2013 Formal Notice; 2016 Reasoned opinion; 2017 Referral to ECJ; 2024 Formal Notice - The Commission calls on IRELAND to comply with a judgment of the Court of Justice on the adequate collection and treatment of urban wastewater. **Urban Wastewater Treatment Directive** (wastewater treatment performance) CJEU Judgement - Ireland breached the requirements of the directive in 28 agglomerations by failing to protect people's health and the environment by requiring that urban wastewater is collected and treated before discharge into the environment.
- 2018 Formal Notice; 2020 Reasoned Opinion; 2021 Referral to Court of Justice: WATER - Exceedance of THM parametric value in drinking water in Ireland. **Drinking Water Directive** (excess trihalomethanes in drinking water) CJEU - Ireland has failed to meet its obligations under an EU directive on the quality of drinking water for trihalomethanes (THMs) found in 21 public water-supply zones and 9 group water schemes.
- 2007 Formal notice; 2011 Reasoned opinion; 2019 additional formal notice; Additional Reasoned opinion; 2023 Referral to ECJ: **Incorrect transposition of the Water Framework Directive** 2000/60/EC by Ireland - seeking Ireland to correctly transpose the WFD – areas of concern are water abstraction, impoundment and activities causing hydromorphological changes such as dams, weirs and other interferences in natural water flow.

The urgency of addressing water quality is acknowledged given the potential impending fines if these issues are not addressed. The Business Cases referred to in Chapter 3 identify local government requirements to support greater action on the ground which also assist in the defence to such cases.

Deteriorating Quality of Ireland's Environment

The EPA issued its eight State of the Environment Report in late 2024. This report states that there is a need for urgent interventions to address climate change and biodiversity decline. While some welcome progress is being made on climate action, we are still well-off track in meeting our 2030 targets. It further identifies other environmental priorities for Ireland including tackling water pollution, investing in critical water services, improving waste segregation and recycling rates, continuing to improve our air quality and mitigating radiological risks. In addition, this assessment indicates that how land use is a significant contributor to the climate, biodiversity and water quality challenges. The report advises multifunctional approaches to land management, which will require extensive engagement with landowners. More urgent

system-wide change is needed across the energy, transport, industrial and food sectors and in the built environment to improve sustainability and reduce emissions that are damaging to our environment, our climate and our health. The report suggests greater momentum is required towards delivering on not only climate, but also our biodiversity, water, circular economy and pollution reduction goals. Delivering on these goals requires transformational change in many of the core systems of our society and will involve everyone.

An Expanding Agricultural sector

Agricultural policy in Ireland is largely influenced by European Policy, particularly the Common Agricultural Policy (CAP). This policy is continually evolving from an intensively production-based policy to one that increasingly supports sustainable farming across the EU while addressing food security issues globally. Agriculture is the most significant pressure on water quality in Ireland largely due in part to the fact that agriculture is the most common land use across the country. Nitrogen (in freely draining areas) and phosphorus (in poorly draining areas) are the most significant nutrients impacting water quality.

Recent EPA reports have shown some encouraging results for nitrogen levels in water; however, it remains a significant issue. Under the Nitrates Regulations (S.I. 113 of 2022) farmers must not apply more than 170kgs of nitrogen from livestock manure per hectare per year. Compliance with the Nitrates Regulations is one of the Statutory Management Requirements under the Single Payment Scheme which supports farm incomes. Ireland has successfully secured Nitrates derogations, the most recent in 2022, for over 7,000 farmers allowing them to apply up to 220kg of N per Hectare. In lieu, these farmers are held to a higher environmental regulatory standard than non-derogation farmers to secure their single farm payments.

The Irish Government is currently in the process of negotiating the next round of nitrate derogation which will be challenging given the on-going impact of nitrogen on water quality, and the fact that the European Commission requires the state to demonstrate efforts to conserve designated sites or species under the EU's Habitats Directive should the derogation be granted. It has been argued that to secure further derogations, the Irish state must demonstrate improvements in water quality in tandem with maintaining the derogation limits, particularly in catchments where derogation farms are located. The dairy industry is a multi-billion Euro industry in Ireland and has expressed concerns over the financial and socio-economic impacts to farmers and rural Ireland should the state fail to retain the derogation.

Specific measures under the Water Action Plan to support farmers improve water quality include the Farming for Water EIP, Acres and Acres CP programmes and the expansion of the ASSAP Teagasc Better farming for Water programmes.

In addition to the DAFM, the Local Authority sector has been assigned enforcement responsibilities to ensure farmers comply with the Good Agricultural Practice (GAP) for the Protection of Waters Regulation. A significant component of these regulations seeks to protect water quality from point and diffuse agricultural pollutants. To ensure compliance, the local authority sector implement a National Inspections Programme, and a minimum of 4000 inspections are required annually for it to be effective. Following successful implementation of a Local Authority business case (detailed in section 5.3), an additional 57 staff were approved by the DHLGH for local authorities in 2024 to help achieve this target.

Economic, Social & Cultural Drivers

By its very nature water flows across the landscape and improvement in water management is key to supporting many different aspects of society. Getting water management right at all

levels of Government and society is key in addressing multiple environmental issues. For example:

- Climate Action (too much and too little water)
- Biodiversity – many of our habitats/species of concern rely on good water quality
- Urban drainage – minimising the impact of storm events on water quality, through effective drainage planning, maintenance and management
- Economic Development/Community – better management of our water assets would see a greater return from our precious natural resources.

The key benefits that flow from implementing a robust system of managing natural water resources are many, addressing community, economic and cultural needs include:

- Ensuring that industry has a plentiful supply of high-quality water as an available resource. For example, pharmaceuticals companies employ many thousands of people all over Ireland require quality water for their operations in addition to their brand and status being dependent on good environmental practices.
- High quality bathing waters, rivers, lakes and seas are an integral part of our tourism industry. An example of such is angling, which depends on good water quality. Inland Fisheries commissioned a [report in 2012](#) showing direct spend on angling was €555 million and indirect spend was €200 million, a total of €755 million.
- Maintaining and leveraging Ireland’s “Green Image” is integral to Bord Bia’s Origin Green initiative, which focuses on pioneering food and drink sustainability programmes.
- The importance of the agri-food sector to the Irish economy has been mentioned earlier. It remains an integral part of the economy and society, and especially so for rural and coastal communities.
- An Bord Iascaigh Mhara, (BIM) provides supports to the aquaculture industry, including our shellfish industry, providing training, advisory and sustainability supports for operators. The continuing success of this industry is predicated on operating in a high-quality water environment.
- All industries and communities depend on good quality raw water. Treating high quality raw water to provide good drinking water is less expensive than processing poor quality raw water. The World Health Organisation (WHO) states that for every €1 euro spent on water protection between €7 and €200 are saved on water treatment.
- It is acknowledged by economists that clean water is the primary building block for a building and supporting a resilient economy and communities. Further, water enhances our landscape and brings benefits to our mental health and wellbeing.

As a society, there has been a significant cultural shift over the past 30 years with people more aware than ever of the importance of the natural environment to their everyday lives. The youth environmental movement has grown significantly over the past 10 years and are demanding action on climate change and environmental sustainability. In addition, it has become widely documented that spending time in the natural environment improves personal wellbeing. People are building time for nature into their daily lives through recreation and activities with water being a desirable attraction.

Appendix 6 – Key Actions from the Water Action Plan 2024 where Local Government Sector is the lead organisation

Local Authority Actions

WAP Action Code	WAP Action	WAP Sub-action code	WAP Sub-action	Lead Org
Action 5.3	LAWPRO will confirm significant pressures and work with implementing bodies and stakeholders to promote the implementation of appropriate restoration measures in each Area for Action (restoration) where environmental objectives are not being met.	5.3.3	Local Authorities carry out local catchment assessment/inspections in Areas for Action (AfAs)	Local Authorities
Action 5.3	LAWPRO will confirm significant pressures and work with implementing bodies and stakeholders to promote the implementation of appropriate restoration measures in each Area for Action (restoration) where environmental objectives are not being met.	5.3.4	Local Authorities work with relevant agencies to action the local measures required to address the pressures identified	Local Authorities
Action 5.5	Restoration and protection measures advanced in all Areas for Action with Blue Dots	5.5.4	Implementation of measures to improve WQ. Protection Plan which may include LCA assessment, inspection activities, enforcement action and planning controls	Regional Committees / Local authorities
Agri 2	Local authorities to undertake inspections, enforcement and reporting as outlined in the National Agricultural Inspection Programme and cross report to DAFM where non compliances are identified	Agri 2.5	To undertake inspections on approximately 4,500 farms per annum and follow up inspection/enforcement/ cross reporting/reporting targets as specified by the EPA in each iteration of the National Agricultural Inspection Programme	Local Authorities

WAP Action Code	WAP Action	WAP Sub-action code	WAP Sub-action	Lead Org
Agri 2	A data management system will be developed in an incremental and phased manner to capture and track the National Agricultural Inspections Programme. This system will be designed to be integrated with other WFD data systems	Agri 2.6	Initial phase of data management system	EPA/NIECE
Agri 2	Training will be provided for local authority staff and others undertaking inspections under the GAP Regulations including DAFM and Inland Fisheries Ireland personnel undertaking inspections	Agri 2.9	Training courses will be delivered	EPA/NIECE Local Authorities / LANTG / LAWPRO
Domestic WW 3	Local Authorities to engage with householders to improve general awareness of septic tank maintenance requirements, and to address any failing septic tanks.	Domestic WW 3.1	Local Authorities shall establish a clearly ringfenced resource for this action	EPA; Local Authorities
Domestic WW 3	Local Authorities to engage with householders to improve general awareness of septic tank maintenance requirements, and to address any failing septic tanks.	Domestic WW 3.2	Local Authorities shall put a written plan in place to complete the engagement activities as set out in the NIP	EPA; Local Authorities
Domestic WW 3	Local Authorities to engage with householders to improve general awareness of septic tank maintenance requirements, and to address any failing septic tanks.	Domestic WW 3.3	Document and report activities	LA
Domestic WW 4	Local Authorities to complete 5,800 inspections between 2022 and 2026 under the National Inspection Programme.	Domestic WW 4.1	Local Authorities shall establish a clearly ringfenced resource for this action	EPA; Local Authorities

WAP Action Code	WAP Action	WAP Sub-action code	WAP Sub-action	Lead Org
Domestic WW 5	The Department of Housing, Local Government and Heritage to issue a policy direction to Local Authorities regarding Advisory Notices and Local Authorities to enforce advisory notices under the National Inspection Plan.	Domestic WW 5.2	Local Authorities shall establish a clearly ringfenced resource for this action	EPA; Local Authorities
Unknown 2	Each local authority supported by LAWPRO will conduct assessments of other water bodies where the pressures are unknown (which are not within priority areas for action) to identify the specific issues and actions that are required to protect or restore water quality as necessary.	Unknown 2.1	Identification of significant pressures, where previously unknown	Local Authorities
Action 7.1	Support the engagement of local communities systematically and on a larger scale through environmental restoration projects and environmental awareness programmes	7.1.3	Environmental restoration projects and environmental awareness programmes launched	DHLGH / DRCD DECC / Local Government

CCMA Actions

WAP Action Code	WAP Action	WAP Sub-action code	WAP Sub-action	Lead Org
Urban Runoff 5	Additional resources will be provided to LAWPRO to provide specialist support to local authorities in adopting international best practice on nature-based surface water management within planning and infrastructure project delivery.	Urban runoff 5.1	Complete review of Local Authority and agree resources required	CCMA
Action 6.17	A review of the wider local authority structures will be progressed to inform future needs in the water area and to identify the appropriate level of resources and involvement required from the sector to meet WFD objectives.	6.17.1	Establish steering and oversight group	CCMA
Action 6.17	A review of the wider local authority structures will be progressed to inform future needs in the water area and to identify the appropriate level of resources and involvement required from the sector to meet WFD objectives.	6.17.2	Appoint resources to carry out review	CCMA
Action 6.17	A review of the wider local authority structures will be progressed to inform future needs in the water area and to identify the appropriate level of resources and involvement required from the sector to meet WFD objectives.	6.17.3	Devise and agree work plan with stakeholders	CCMA

Action 6.17	A review of the wider local authority structures will be progressed to inform future needs in the water area and to identify the appropriate level of resources and involvement required from the sector to meet WFD objectives.	6.17.4	Carry out quantitative and qualitative appraisal of existing local authority resources	CCMA
Action 6.17	A review of the wider local authority structures will be progressed to inform future needs in the water area and to identify the appropriate level of resources and involvement required from the sector to meet WFD objectives.	6.17.5	Carry out initial phase of the review and estimate resources required	CCMA
Action 6.17	A review of the wider local authority structures will be progressed to inform future needs in the water area and to identify the appropriate level of resources and involvement required from the sector to meet WFD objectives.	6.17.6	Complete review and agree resources required	CCMA

LAWPRO Actions

WAP Action Code	WAP Action	WAP Sub-action code	WAP Sub-action	Lead Org
Action 1.1	Integrated catchment management approaches will be used to identify and decide on further specific measures for each water body, where they are required in addition to those set in this plan. These will be included in the 46 Catchment Management Work Plans, which will be used to locate measures within each catchment. The co-benefits of water-focused measures on climate and biodiversity will also be identified.	1.1.1	Coordination of the Sectoral Action Work Plans and subsequent CM Work Plans	LAWPRO
Action 1.2	The Catchment Management Work Plans will include the list of water bodies, their associated status, significant pressures/issues and targeted measures, along with outcomes-based targets for the third-cycle and key performance indicators to monitor progress and outcomes. Justification for water bodies not meeting their WFD objective by 2027 should also be included in catchment management plans, in line with Article 4 of the WFD.	1.2.1	Coordination of the preparation of the 46 CMWP through Regional Committees	LAWPRO

WAP Action Code	WAP Action	WAP Sub-action code	WAP Sub-action	Lead Org
Action 1.2	The Catchment Management Work Plans will include the list of water bodies, their associated status, significant pressures/issues and targeted measures, along with outcomes-based targets for the third-cycle and key performance indicators to monitor progress and outcomes. Justification for water bodies not meeting their WFD objective by 2027 should also be included in catchment management plans, in line with Article 4 of the WFD.	1.2.2	Dissemination of the Catchment Management Work Plans template to enable content provision by implementing bodies and community input over time	LAWPRO
Action 1.2	The Catchment Management Work Plans will include the list of water bodies, their associated status, significant pressures/issues and targeted measures, along with outcomes-based targets for the third-cycle and key performance indicators to monitor progress and outcomes. Justification for water bodies not meeting their WFD objective by 2027 should also be included in catchment management plans, in line with Article 4 of the WFD.	1.2.3	Implementing bodies to provide Work Programmes / Action Plans/ Local Authority Water Action Plans (in the required format) for online reporting in the 46 Catchment Management Work Plans (CMWPs)	All implementing bodies including Local Authorities

WAP Action Code	WAP Action	WAP Sub-action code	WAP Sub-action	Lead Org
Action 1.2	The Catchment Management Work Plans will include the list of water bodies, their associated status, significant pressures/issues and targeted measures, along with outcomes-based targets for the third-cycle and key performance indicators to monitor progress and outcomes. Justification for water bodies not meeting their WFD objective by 2027 should also be included in catchment management plans, in line with Article 4 of the WFD.	1.2.4	Implementing bodies to provide Action Plan Implementation data annually (in the required format) for online reporting in the 46 Catchment Management Work Plans (CMWPs)	All implementing bodies including Local Authorities
Action 3.3	LAWPRO will co-ordinate a simplified climate change sensitivity analysis or “climate check” which will be undertaken in line with EU Guidance during the third RBMP cycle at the level of the Catchment Management Work Plans. The check will also inform the setting of RBMP environmental objectives for the following fourth-cycle.	3.3.1	LAWPRO to engage with implementing bodies on the development of an agreed process for carrying out a ‘Climate Check’	LAWPRO
Action 3.3	LAWPRO will co-ordinate a simplified climate change sensitivity analysis or “climate check” which will be undertaken in line with EU Guidance during the third RBMP cycle at the level of the Catchment Management Work Plans. The check will also inform the setting of RBMP	3.3.2	Measures to be climate checked as part of SEA/AA process for capital projects	LAWPRO

WAP Action Code	WAP Action	WAP Sub-action code	WAP Sub-action	Lead Org
	environmental objectives for the following fourth-cycle.			
Action 3.3	LAWPRO will co-ordinate a simplified climate change sensitivity analysis or “climate check” which will be undertaken in line with EU Guidance during the third RBMP cycle at the level of the Catchment Management Work Plans. The check will also inform the setting of RBMP environmental objectives for the following fourth-cycle.	3.3.3	Carry out climate checks on measures	LAWPRO
Action 3.3	LAWPRO will co-ordinate a simplified climate change sensitivity analysis or “climate check” which will be undertaken in line with EU Guidance during the third RBMP cycle at the level of the Catchment Management Work Plans. The check will also inform the setting of RBMP environmental objectives for the following fourth-cycle.	3.3.4	LAWPRO to report to Programme Delivery Office on climate checks conducted on measures	LAWPRO
Action 4.1	The EPA and LAWPRO, with the support of the implementing bodies and other stakeholders, will continue to assess the impacts of pressures on waters to inform the measures that are needed.	4.1.2	Undertake further characterisation in water bodies that are At Risk of not achieving their objectives	LAWPRO

WAP Action Code	WAP Action	WAP Sub-action code	WAP Sub-action	Lead Org
Action 5.1	The Department of Housing, Local Government and Heritage will oversee an independent review of progress with the implementation of the Programme of Measures.	5.1.4	Report from Regional Management Committees to NCMC on implementation of water body level measures	Regional Management Committees
Action 5.1	The Department of Housing, Local Government and Heritage will oversee an independent review of progress with the implementation of the Programme of Measures.	5.1.7	Catchment Forum meetings held in the 46 catchments	LAWPRO
Action 5.3	LAWPRO will confirm significant pressures and work with implementing bodies and stakeholders to promote the implementation of appropriate restoration measures in each Area for Action (restoration) where environmental objectives are not being met.	5.3.1	LAWPRO carries out local catchment assessment in each priority area for action (PAA)	LAWPRO
Action 5.3	LAWPRO will confirm significant pressures and work with implementing bodies and stakeholders to promote the implementation of appropriate restoration measures in each Area for Action (restoration) where environmental objectives are not being met.	5.3.2	ASSAP and implementing bodies action the referrals for implementation of measures	ASSAP; All implementing bodies
Action 5.3	LAWPRO will confirm significant pressures and work with implementing bodies and stakeholders to promote the implementation of appropriate restoration measures in each Area	5.3.7	LAWPRO carries out local catchment assessment in Priority Blue Dot Areas for Restoration	LAWPRO

WAP Action Code	WAP Action	WAP Sub-action code	WAP Sub-action	Lead Org
	for Action (restoration) where environmental objectives are not being met.			
Action 5.3	LAWPRO will confirm significant pressures and work with implementing bodies and stakeholders to promote the implementation of appropriate restoration measures in each Area for Action (restoration) where environmental objectives are not being met.	5.3.8	ASSAP and implementing bodies action the referrals for implementation of measures in Priority Blue Dot Areas for Restoration	ASSAP; All implementing bodies
Action 5.3	LAWPRO will confirm significant pressures and work with implementing bodies and stakeholders to promote the implementation of appropriate restoration measures in each Area for Action (restoration) where environmental objectives are not being met.	5.3.9	Commencement of Catchment Management and Catchment Sectoral Plans	LAWPRO; All implementing bodies; Each Sector Lead
Action 5.4	LAWPRO will confirm significant pressures and work with implementing bodies and stakeholders to progress the implementation of appropriate protection measures in areas that are meeting their environmental objectives but require protection to ensure that water quality does not deteriorate.	5.4.1	Local Authorities carry out local catchment assessment/inspections and implement planning and regulatory controls in Areas for Action (AfAs) with a Protect objective	LAWPRO

WAP Action Code	WAP Action	WAP Sub-action code	WAP Sub-action	Lead Org
Action 5.4	LAWPRO will confirm significant pressures and work with implementing bodies and stakeholders to progress the implementation of appropriate protection measures in areas that are meeting their environmental objectives but require protection to ensure that water quality does not deteriorate.	5.4.3	LAWPRO to prepare a template Protection Plan for Blue Dot Areas and roll out to all Blue Dots that are meeting their environmental objectives	LAWPRO
Action 5.5	LAWPRO, in cooperation with the EU LIFE IP Waters of LIFE project team, will publish a new Blue Dot Programme work plan for waters with a High Status Objective.	5.5.1	Blue Dots specific section in the template designed for the catchment management plans, to include work programmes/ action plans from implementing bodies with the greatest significant pressures on Blue Dots	LAWPRO
Action 5.5	LAWPRO, in cooperation with the EU LIFE IP Waters of LIFE project team, will publish a new Blue Dot Programme work plan for waters with a High Status Objective.	5.5.2	Blue Dot section in each of the 46 Catchment Management Work Plans	LAWPRO
Action 5.5	LAWPRO, in cooperation with the EU LIFE IP Waters of LIFE project team, will publish a new Blue Dot Programme work plan for waters with a High Status Objective.	5.5.3	Pilot community fora to inform the development and supports needed for local level initiatives specifically for Blue Dot waters	LAWPRO
Action 5.5	LAWPRO, in cooperation with the EU LIFE IP Waters of LIFE project team, will publish a new	5.5.4	Restoration and protection measures advanced in all Areas for Action with Blue Dots	Regional Committees; Local authorities

WAP Action Code	WAP Action	WAP Sub-action code	WAP Sub-action	Lead Org
	Blue Dot Programme work plan for waters with a High Status Objective			
Action 5.5	LAWPRO, in cooperation with the EU LIFE IP Waters of LIFE project team, will publish a new Blue Dot Programme work plan for waters with a High Status Objective.	5.5.6	Blue Dot Catchments Programme Communications and Engagement Plan implementation	LAWPRO
Action 5.6	Catchment projects aimed at improving water quality to be advanced in 15 areas (including community initiatives, Rivers Trusts, EIPs, PEACE+)	5.6.1	Current Catchment Projects that will contribute to WFD water quality objectives	Catchment Project lead organisation
Agri 9	Extend and expand the local authorities' water protection office. LAWPRO will be extended for the full duration of Cycle 3 up to 2027. The CCMA will identify the appropriate level of resources and involvement of LAWPRO to meet WFD objectives up to 2027 and beyond in future RBMPs.	Agri 9.1	Internal review of LAWPRO	LAWPRO
UWW 12	Uisce Éireann will engage with LAWPRO with the data required for their work in compiling the 46 catchment work plans and also trialling the Catchment Management Work Plans template in the 5 pilot catchments.	UWW 12.1	Engage with LAWPRO in the development of 46 Catchment Work Plans also trialling the Catchment Management Work Plans template in the 5 pilot catchments	LAWPRO

WAP Action Code	WAP Action	WAP Sub-action code	WAP Sub-action	Lead Org
Unknown 1	The Local Authority Waters Programme (LAWPRO) will conduct assessments of water bodies in Priority Areas for Action where the pressures are unknown to identify the specific issues and actions that are required to protect or restore water quality as necessary.	Unknown 1.1	Assess unassigned WBs as part of PAA work and make referrals for implementation of measures	LAWPRO
Unknown 3	The Local Authority Services National Training Group (LASNTG) will provide appropriate training programmes including on Catchment assessment, Integrated Catchment Management, and farm inspections for the staff of local authorities and all implementing bodies.	Unknown 3.1	Review training programme necessary for the LA natural water sector	LAWPRO
Unknown 3	The Local Authority Services National Training Group (LASNTG) will provide appropriate training programmes including on Catchment assessment, Integrated Catchment Management, and farm inspections for the staff of local authorities and all implementing bodies.	Unknown 3.2	Coordination of development of training materials	LAWPRO
Action 6.1	LAWPRO will oversee the development of the template for the 46 Catchment Management Work Plans by Q2 2024.	6.1.1	Engagement with POMs WG	LAWPRO

WAP Action Code	WAP Action	WAP Sub-action code	WAP Sub-action	Lead Org
Action 6.1	LAWPRO will oversee the development of the template for the 46 Catchment Management Work Plans by Q2 2024.	6.1.2	Engagement with LAWPRO on the information required for inclusion in the CMWPs	All implementing bodies
Action 6.1	LAWPRO will oversee the development of the template for the 46 Catchment Management Work Plans by Q2 2024.	6.1.3	Implementation bodies to provide 2024 Work Programmes / Action Plans with actions at a water body scale to be trialled as part of the development of the CMWP template in the pilot catchment areas	All implementing bodies
Action 6.1	LAWPRO will oversee the development of the template for the 46 Catchment Management Work Plans by Q2 2024.	6.1.4	Outline of template for Catchment Management Work Plans communicated	LAWPRO
Action 6.1	LAWPRO will oversee the development of the template for the 46 Catchment Management Work Plans by Q2 2024.	6.1.5	Finalise Catchment Management Work Plans for pilot catchments	LAWPRO
Action 6.1	LAWPRO will oversee the development of the template for the 46 Catchment Management Work Plans by Q2 2024.	6.1.6	Finalise CMWP Templates and Processes	LAWPRO
Action 6.2	Implementing Bodies to engage with LAWPRO with the data required for their work in compiling the 46 Catchment Work Plans and also trialling the CMWP template in the 5 pilot catchments.	6.2.1	Engage with LAWPRO in the development of 46 Catchment Work Plans also trialling the CMWP template in the five pilot catchments	LAWPRO

WAP Action Code	WAP Action	WAP Sub-action code	WAP Sub-action	Lead Org
Action 6.8	Specific capacity building programmes of work to be put in place to encourage the transfer of learning and knowledge.	6.8.1	Review training programme necessary for the LA natural water sector	LAWPRO
Action 6.8	Specific capacity building programmes of work to be put in place to encourage the transfer of learning and knowledge.	6.8.3	Knowledge transfer from local initiatives and projects through the different governance tiers	LAWPRO
Action 6.9	Ensure further activation, development, and support of local level initiatives (rivers trusts, catchment partnerships) in support of the delivery of the RBMP.	6.9.1	Consideration of Resilience Project review report findings	LAWPRO
Action 6.9	Ensure further activation, development, and support of local level initiatives (rivers trusts, catchment partnerships) in support of the delivery of the RBMP.	6.9.2	Workshops as part of the framework for the delivery of the Catchment Community Fora in five pilot catchments	LAWPRO
Action 6.9	Ensure further activation, development, and support of local level initiatives (rivers trusts, catchment partnerships) in support of the delivery of the RBMP.	6.9.3	Review of Funding models and supports to groups	LAWPRO
Action 6.10	The Water Forum to identify and advise the Water Policy Advisory Committee (WPAC) and Minister on the optimum level of engagement with the implementation bodies, agencies and structures for the WFD to support implementation of the	6.10.3	An Fóram Uisce to engage with Regional Structures through the Regional Management Committees	LAWPRO

WAP Action Code	WAP Action	WAP Sub-action code	WAP Sub-action	Lead Org
	third-cycle, in accordance with its functions under Article 26 of the 2017 Water Services Act (Number 29).			
Action 6.11	Building on the excellent work already undertaken by the EPA, LAWPRO and various other bodies, DHLGH will provide further supports for the development of a National Water focused Citizen Science Strategy for the monitoring of water quality.	6.11.1	Development of a National Water focused Citizen Science Strategy	Citizen Science Coordination Committee; LAWPRO
Action 6.11	Building on the excellent work already undertaken by the EPA, LAWPRO and various other bodies, DHLGH will provide further supports for the development of a National Water focused Citizen Science Strategy for the monitoring of water quality.	6.11.2	Rollout of the national macroinvertebrate citizen science process developed in Cycle 2	LAWPRO
Action 6.11	Building on the excellent work already undertaken by the EPA, LAWPRO and various other bodies, DHLGH will provide further supports for the development of a National Water focused Citizen Science Strategy for the monitoring of water quality.	6.11.3	Development and production of training and citizen science support materials	LAWPRO

WAP Action Code	WAP Action	WAP Sub-action code	WAP Sub-action	Lead Org
Action 6.12	LAWPRO to evaluate the outcome of the Resilience Project for Rivers Trusts to inform future community engagement initiatives, including on citizen science.	6.12.1	Undertake a review of the effectiveness of the resilience pilot project	LAWPRO
Action 6.13	LAWPRO to examine ways in which further support can be provided for the formation and capacity building of local forums to help identify and implement measures.	6.13.1	Establish a committee to design the format of a Community Forum based on Stakeholder feedback and Pilot findings	LAWPRO
Action 6.13	LAWPRO to examine ways in which further support can be provided for the formation and capacity building of local forums to help identify and implement measures.	6.13.2	Scoping exercise for the development of a framework on how to establish the Catchment Community Fora in five pilot catchments	LAWPRO
Action 6.13	LAWPRO to examine ways in which further support can be provided for the formation and capacity building of local forums to help identify and implement measures.	6.13.3	Trial different engagement methodologies in five pilot catchments	LAWPRO; An Fóram Uisce
Action 6.15	LAWPRO will facilitate public participation in the development of the Catchment Management Work Plans through workshops for the 5 pilot catchments. This will inform the development and implementation of a national approach to public participation to deliver outcomes for water, climate and nature.	6.15.1	Scoping workshops in 5 pilot catchments	LAWPRO

WAP Action Code	WAP Action	WAP Sub-action code	WAP Sub-action	Lead Org
Action 6.16	The public participation pilots will provide learnings (which will then be implemented) on how agencies, local authorities, communities and landowners can work together to support action planning and project co-creation for a combined top-down bottom-up approach to the development and implementation of the 46 Catchment Management Work Plans.	6.16.1	Pilots to include learnings and recommendations on the public participation aspects in the development of the CMWPs	LAWPRO
Action 6.16	The public participation pilots will provide learnings (which will then be implemented) on how agencies, local authorities, communities and landowners can work together to support action planning and project co-creation for a combined top-down bottom-up approach to the development and implementation of the 46 Catchment Management Work Plans.	6.16.2	Establish a committee to design the format of a Community Forum based on Stakeholder feedback and Pilot findings	LAWPRO
Action 6.19	Review to be undertaken of the Local Authority Waters Programme to identify necessary resources for the third-cycle and beyond to deliver the commitments under the WFD and future RBMPs.	6.19.1	Efficiency and Effectiveness Review to be carried out by LAWPRO	LAWPRO
Action 6.20	Review the outcomes of the IPA Governance Research programme on Ireland's water	6.20.6	Knowledge transfer from local initiatives and projects through the different governance tiers	LAWPRO

WAP Action Code	WAP Action	WAP Sub-action code	WAP Sub-action	Lead Org
	governance arrangements and implement their recommendations where appropriate.			

Appendix 7 – Executive Summary of the Local Authority Natural Water Functions Business Case PMO 21/07

1. Executive summary⁴

Ireland is currently in the third cycle of its River Basin Management Plan (RBMP), yet overall water quality continues to decline. This business case responds to the urgent need for action and proposes a strategic and integrated approach to improve water quality through enhanced local authority (LA) capacity and governance.

The Water Framework Directive (WFD) requires all water bodies to achieve "Good Status" by 2027. Despite efforts under previous RBMPs, Ireland has not met these targets, and the European Union has initiated infringement proceedings due to non-compliance with the transposition of the WFD.

It is recognised at Member State and EU level that the objectives of achieving high or good status by 2027 will not be met in all instances. The European Commission is commencing a structured dialogue with Member States to identify the reasons for not meeting the objectives. It is accepted that there will be ongoing river basin management plans needed to restore, but more importantly over time, to protect water quality. DHLGH has commenced work on the 4th cycle River Basin Management Plan, which will cover the period 2028-2033 and it is expected that the role of local authorities will be further strengthened in future River Basin Management Plans. The Water Action Plan 2024 (WAP) commits to resourcing LAs to fulfil their legal obligations in water protection and restoration.

This business case addresses the second stage of the local government response in the WAP: resourcing LAs to deliver their water responsibilities. It complements the separate business case (PMO 24/01) for LAWPRO (Local Authority Waters Programme), which provides regional coordination, public participation and technical expertise.

The resources proposed in the Business Case will enable LA to:

Legal and Strategic Responsibilities

- Fulfil statutory obligations related to water quality under national and EU legislation.
- Deliver responsibilities under the River Basin Management Plans (RBMPs) to protect and restore water quality, guided by catchment science and management principles.
- Ensure compliance with the Water Framework Directive (WFD), including implementation of Basic Measures and reporting on performance.

Operational Delivery and Performance

- Implement actions assigned by LAWPRO in Priority Areas for Action (PAAs).
- Lead and deliver water quality actions in non-PAA water bodies and designated Local Authority (LA) areas for action.
- Establish and maintain effective delivery structures, including robust enforcement regimes.
- Improve service delivery in water quality, enforcement, and environmental outcomes, advancing Ireland's progress toward WFD and RBMP objectives.
- Enhance performance measurement through agreed Key Performance Indicators (KPIs).

⁴ The Executive Summary of this report was generated using Microsoft Copilot (V1.2, 3.6.2025) utilising the content of the main report. Reviewed and approved by Anthony Coleman, Director of Services, LAWPRO

Governance and Collaboration

- Strengthen governance, accountability, and strategic oversight of water quality initiatives, with closer alignment to the CCMA and its committee structures.
- Promote coherence and consistency in water quality actions across all local authorities.
- Foster integrated service delivery across Local Government, embedding water quality as a core function.
- Improve inter-agency collaboration and stakeholder engagement to support shared water quality goals.

Innovation and Public Engagement

- Facilitate the adoption and consistent rollout of new technologies across local authorities.
- Enhance citizen, stakeholder, and customer experience through improved engagement and transparency.
- Deliver broader societal benefits through sustainable water management and environmental stewardship.
- Strengthen the reputation of the local authority sector as a leader in water quality protection.

Risk Mitigation

- Reduce the risk of economic sanctions on Ireland by meeting water quality obligations and targets.

Governance Framework

Improving governance, an issue highlighted in Reviews, is being addressed through the business case and a strengthened governance model. This governance structure ensures transparency, consistency, and accountability across all levels of implementation.

- Establishment of a Water Quality Oversight Group under the CCMA ECCE Committee to lead strategic oversight.
- Creation of a Natural Waters Project Office to coordinate implementation, monitor progress, and support LAs.
- Alignment with existing performance frameworks, including EPA RMCEI and NOAC indicators.
- It is recommended that a Service Level Agreement⁵ between DHLGH and LA covering the natural water functions being delivered by local authorities on behalf of the DHLGH be put in place to formalize funding and responsibilities. This is line with the best practice guidance⁶ available from DHLGH on the delivery of national projects, programme and schemes which require staffing and funding in the Local Sector.

Resources and Implementation

The recommended solution—**Option 3: Enhanced staff resource employed directly by LAs**—is the most effective and efficient model. It integrates water quality work into existing LA structures, supports career development, and ensures local accountability. The allocation of

⁵ Step-by-Step Guidance on Departmental Engagement with the LG Sector

⁶ Delivery of National projects/ programmes/schemes which require staffing and funding in the Local Government Sector. Introductory Note for Government Departments/Agencies. DHLGH.

the additional resources (84 staff) to local authorities will need to be linked to the risks posed to water quality, the protected areas' requirements and the pressures on the waterbodies within each LA functional area, having regard to the existing resources.

This option recommends the establishment of the Water Quality Oversight Group as well as a coordination office i.e., the Natural Waters Project Office, both of which would support the governance structure for the natural waters sector. The role of the Natural Waters Project Office is to support the Water Quality Oversight Group, lead on the development of the Resources Implementation Plan, identify future resource requirements, and coordinate the existing water functions of LAs, including representation on committees and working groups. A proposal to establish the Natural Water Project Office is under consideration. There is ongoing consultation with the LGMA, as they are currently undergoing a strategic review, which may further influence this proposal.

Whilst the resources sought in this Business Case will provide a good start there may be a need for additional resources as the output of Water Quality Oversight Group emerges, new data becomes available and as LAs are given added responsibilities, actions and obligations under Regulations and RBMPs. The Water Quality Oversight Group will keep the natural water area under review and will assess resources and the opportunities that may arise from new technologies and the potential of resources that may become available as part of the Uisce Éireann Cooperation Agreement. It is proposed that the strategic review of LA Water Functions undertaken by the Water Quality Oversight Group, and the 'Status of Local Government Sector Water Governance and Functions' report, will inform the work programme of the Water Quality Oversight Group.

It is recommended that the allocation of posts be clarified to meet the Peer Review Group's requirement for transparency, ensuring that the distribution across all local authorities and regions is clearly understood. It is recommended that the ECCE Water Quality Oversight Group, supported by the Natural Waters Project Office, when established, prepare a Resources Implementation Plan, to provide such clarity. In the absence of the coordination office the Water Quality Oversight Group will fulfil this function in the short term.

The proposal includes a request for the following resources:

	Additional Measures	Additional Resource Needed (FTE)
Coordination, Planning and Assessment	LA Coordination	2.0
	Assessment and Planning	18.7
	Resources	20.7
Enforcement Resources	DWWTS	12.8
	S4 Licencing	7.1
	S4 Licencing (unlicenced sites)	16.5
	Unauthorised Discharges ⁷	-
	Complaints	5.0
	Planning Control	10.9
	WFD Sampling and Monitoring	-

⁷ Additional resources for these areas have not been requested within this business case but will be kept under review by CCMA Water Quality Oversight Group.

	Agric Inspection resourced through Interim Business Case (11 + 57)	-
	Protected Areas (+6.7%)	13.2
	Resources	65.5
	Total Resources (FTE)	86.2

TABLE 1 SUMMARY OF OPTION 3 RESOURCE REQUIREMENTS

A **Service Level Agreement** (SLA) is proposed to be agreed and signed between the Department of Housing, Local Government and Heritage (DHLGH) and the local authorities, which would contain details of the funding commitment for local authorities in relation to the resources sought in this business case as well as those already provided for implementation of the National Agricultural Inspection Programme (NAIP)(57 posts).

The SLA will acknowledge that implementation of the RBMPs, carrying out of inspections and taking enforcement action is an enduring legal obligation that requires permanent posts in local authorities and on-going funding from central government. DHLGH commits to funding the local authorities for the resources outlined in this Business Case as well as those already provided for implementation of the National Agricultural Inspection Programme (57 posts) for as long as Local Authorities have assigned responsibilities under the relevant legislation. The SLA will include provision for a phased Resource Implementation Plan, work programme deliverables and targets.

The cost in this Business Case takes account of the LGMA Business Case guidelines and includes PRSI 11.25% (from Oct 2025) of base pay, Pension is estimated at 13% of base pay as per C&AG Guidelines and 25% is applied to cover the overhead costs as per the revised RIA guidelines. The proposal uses the midpoint of the pay scale as required by the Public Spending Code.

Addressing Out of Scope Key Areas

It is critical that the following three keystone areas progress as a matter of priority.

- It is essential that the water functions be included within the National Digital and ICT Strategy. A NEMIS project board specifically to address the water aspects of ICT and data management is required. The NEMIS project is now under the remit of the LGMA ICT Directorate and is being progressed jointly by EPA, DHLGH and CCMA.
- The LAWPRO Business Case is undergoing a parallel process to this business case as they are integrally linked. The revised business case falls under the remit of the ECCE Water Quality Oversight Group and will be presented to the Public Service Reform and Oversight Group (PSROG) at their Q3 2025 meeting.
- LASNTG, with LAWPRO support, has completed a review of LA training needs and prepared a costed Training Plan for local authorities. The LASNTG has made budget submission to the DHLGH for 2026, taking account of the recommendations in the Training Plan. The training needs assessment has identified a deficit in enforcement skills training and this is being prioritised.

Section 3.9 examines in detail additional areas that are not included within the scope of this business case including Agriculture, Rural Water, Abstractions, Urban Runoff and Misconnections, Monitoring and Maintenance, WFD Planning Guidance, Marine Strategy Framework, Hydromorphology and Drainage districts.

Expected Outcomes

- Improved water quality and compliance with EU directives.
- Enhanced enforcement and performance tracking.
- Greater integration of water quality into LA functions.
- Stronger community engagement and public trust.
- Reduced risk of EU sanctions and reputational damage.

Conclusion

This business case presents a timely and strategic opportunity to modernise water quality delivery in Ireland. By resourcing LAs appropriately and embedding water protection across their functions, Ireland can make meaningful progress toward its environmental goals and safeguard its natural capital for future generations.

Appendix 8 – Executive Summary of Local Authority Waters Programme Business Case PMO 24/01

1. Executive Summary⁸

Overview

This business case sets out a clear and strategic proposal to expand and regularise the Local Authority Waters Programme (LAWPRO).

The Local Authority Waters Programme (LAWPRO) is a shared service supporting all 31 local authorities in Ireland to meet their legal obligations under the EU Water Framework Directive (WFD). Jointly managed by Kilkenny and Tipperary County Councils and funded by the Department of Housing, Local Government and Heritage (DHLGH), LAWPRO plays a central role in delivering the Water Action Plan 2024 (WAP).

Regional implementation is the responsibility of Local Authorities as per the Water Policy Regulations (S.I. 350 of 2014) which assigned responsibility to Local Authorities for:

- regional co-ordination,
- public participation,
- support to the EPA and Minister in the development and implementation of RBMPs and Programme of Measures.

The Water Action Plan 2024 has several Actions assigned to the DHLGH, which seek to enhance governance and implementation of the Plan. LAWPRO recommends that the Water Policy Regulations be amended by DHLGH to reflect the updates in WFD governance, including the updated local authority delivery functions via LAWPRO and Local Authorities.

LAWPRO has grown from 20 staff in 2016 to 87 in 2025 (plus an additional 10 post sanction in Aug 2025), reflecting its expanding remit and the increasing complexity of water management challenges. However, many staff are on temporary contracts, and the scale of work has increased significantly. Without action, LAWPRO's ability to retain skilled staff and deliver on its responsibilities is at risk.

The business case addresses two key issues:

1. The need for additional resources to deliver new and expanded responsibilities under the Water Action Plan 2024 (WAP).
2. The need to regularise staff contracts, transitioning from temporary to permanent roles to ensure programme sustainability.

Why This Matters

Ireland's water quality is declining. Nearly half of our rivers, lakes, and coastal waters are not in good ecological health. LAWPRO plays a central role in reversing this trend by

⁸ The Executive Summary of this report was generated using Microsoft Copilot (V1.2, 3.6.2025) utilising the content of the main report. Reviewed and approved by Anthony Coleman, Director of Services, LAWPRO

coordinating local authority actions, engaging communities, and providing scientific expertise.

Strategic Importance for Local Authorities

LAWPRO enables local authorities to:

- Deliver on WFD obligations through coordinated regional implementation
- Access scientific expertise and catchment assessments
- Engage communities in water protection and restoration
- Receive training and support for enforcement and planning
- Align water actions with climate, biodiversity, and sustainability goals

LAWPRO is not an enforcement body but supports local authorities in targeting actions based on scientific evidence.

Current Status and Resourcing

Budget: €11,976,700 (2025), fully funded by DHLGH

Staffing: 87 (plus 10 approved in Aug 2025) sanctioned posts, 76 filled, 21 vacancies – temporary contracts

Hosting: Staff are based in LA offices or independent hubs; LA hosting contributions for LAWPRO staff

Business Case Proposal

Options 1 – 3 do not address the business case outlined the regularisation of LAWPRO staff contracts, due to the nature of contract type and duration for several staff. These concerns have also been raised by the PSROG Peer Review Group citing that they are unlikely from a legal perspective and are considered to not be viable options. Therefore, they are not considered further in this document.

The business case recommends **Option 5**: Expansion and Regularisation of LAWPRO, which includes:

- Continuing LAWPRO's role in delivering the WFD, supporting local authorities, and engaging communities.
- Making existing staff permanent
- Adding 33 (10 already sanctioned in 2025) new positions to meet growing demands
- Establishing a Service Level Agreement (SLA) with DHLGH
- Ensuring sustainable funding and staffing

This option scored highest in both weighted and differentiated assessments and directly addresses staffing risks and programme continuity.

Staffing

Additional resources proposed within this LAWPRO business case are for specific functions within LAWPRO. These include increased resources for the communities' team for

community capacity building and increased resources for the catchments team for detailed local catchment characterisation to be undertaken (Table 1).

On the communities' team side, further activation of groups such as catchment associations and Rivers Trusts, and administration of funding such as the Community Water Development Fund and Catchment Support Fund is leading to higher quality and greater ambition medium to large scale projects focused on water quality improvements. LAWPRO is also leading out on the trial implementation of Catchment Community Fora model and framework as well as testing approaches to facilitate active public participation in the WFD Governance Structures and support public involvement in improving and restoring water quality in the pilot catchments.

The catchments team refer its local catchment assessment findings to implementing bodies and this scientific evidence base directly influences the work of these bodies, who are tasked with implementing measures on the ground e.g. ASSAP, Uisce Éireann, EPA, Local Authorities. With increasing use of the scientific evidence base for the pressures on our water environment, comes the better targeting of measures by implementing bodies, enforcement activities by local authorities and others, and bespoke projects to develop or innovate new measures or delivery mechanisms via national schemes.

LAWPRO's new LA support and coordination team help the coordination of local authority actions for efficiency and effectiveness, with an initial focus on the agriculture area through the delivery of the National Agricultural Inspection Programme (NAIP) and building capacity of local authorities' staff through supporting development and timely delivery of focused water-related training programmes in collaboration with the LASNTG. The team provides the secretariate for the LA liaison meetings. These meetings take place in the five regions alongside the five Regional Operational Committees (ROCs). The team will engage with LAs through the Liaison meetings to develop a template for the LA Water Action Work Plan and will be an important point of contact for the LGMA Natural Waters Office.

Local Authority Services National Training Group (LASNTG) are responsible for providing water training to LA and, with LAWPRO support, have completed a review of LA training needs and prepared a costed Training Plan for local authorities. LAWPRO provides LA support and coordination function and works closely with EPA to assist LA undertake the enforcement actions assigned to them.

LAWPRO, through its coordination role, will continue to work with all stakeholders to follow this catchment-based approach via the development of Catchment Management Work Plans and Sectoral Action Work Plans. The development of LA Action Work Plans will highlight the targeting of LA enforcement work to resolve water quality issues.

It is anticipated that the recruitment of LAWPRO staff will occur across a three-year period – 2025 to 2027. LAWPRO intend to progress the introduction of a graduate programme through Tipperary County Council, as this would facilitate a better pipeline of suitable candidates into the programme and reduce the impact on the local government sector. New contracts under the SLA will have appropriate wording to allow for redeployment in line with the agreed exit plan.

Table 1 Current LAWPRO sanctioned staff plus additional 33 staff for expanded LAWPRO

LAWPRO Sanctioned Staff 2025	number of positions
<i>Administrative Officer (Grade 7)</i>	<i>1</i>
<i>Assistant Staff Officer (Grade 4)</i>	<i>2</i>
<i>Blue Dot Team Lead (Executive Scientist)</i>	<i>1</i>
<i>Catchment Scientist (Assistant Scientist)</i>	<i>31</i>
<i>Clerical Officer (Grade 3)</i>	<i>3</i>
<i>Communications Lead (Grade 7)</i>	<i>1</i>
<i>Community Water Officers (Grade 5)</i>	<i>16</i>
<i>Digital & Social Media Officer (Staff Officer Grade V)</i>	<i>1</i>
<i>Director of Services</i>	<i>1</i>
<i>Funding Lead (Grade 7)</i>	<i>1</i>
<i>GIS/IT Data Analyst</i>	<i>1</i>
<i>Health & Safety Lead (Executive Engineer/Scientist)</i>	<i>1</i>
<i>IS Project Lead</i>	<i>1</i>
<i>LA Support & Coordination Lead (Executive Scientist)</i>	<i>2</i>
<i>LA Support & Coordination Manager (Senior Executive Scientist)</i>	<i>1</i>
<i>Nature Based Solutions, Senior Specialist (Senior Executive Engineer)</i>	<i>2</i>
<i>Catchments Manager (Senior Executive Scientist)</i>	<i>5</i>
<i>Regional Coordinator (Senior Engineer/Scientist Grade)</i>	<i>5</i>
<i>Senior Community Water Officers (Grade 6)</i>	<i>5</i>
<i>Senior Staff Officer (Grade 6)</i>	<i>1</i>
<i>Technical Lead (Executive Scientist)</i>	<i>5</i>
Additional Staff (2025-2027)	
Operations Support Team Manager (Senior Executive officer)	1 ⁹
Human Resources Lead (Grade 6)	1
Clerical Officer (Grade 3)	1
Specialist Technical Leads (Executive Scientist)	6 ²
LA Coordination and Support Lead (Executive Scientist)	1
Catchment Scientist (Assistant Scientist)	10
Community Team Managers (Grade 7 (analogous))	5
Senior Community Water Officer – Catchment Community Fora (Grade 6)	5 ²
Community Water Officers (Grade 5)	3 ²
TOTAL	120

Costs and Funding

The Programme is currently 100% funded by DHLGH through a Memorandum of Funding Agreement. LAWPRO submits vouched expenses on a quarterly basis. Annual budget requests are submitted in July each year, for consideration for funding in the following financial year. The costs in this Business Case take account of the LGMA Business Case

⁹ Sanction received in Aug 2025 for 10 posts (1 Senior Executive Officer, 1 Executive Engineer (Specialist Technical Leads), 5 Senior Community Water Officers and 3 Community Water Officers)

guidelines and include PSRI 11.25% of base pay (from Oct 2025), pension is estimated at 13% of base pay as per C&AG Guidelines and 25% is applied to cover the overhead costs (CMC) as per the revised RIA guidelines. Office Annual Costs not included in the CMC charge are for general operational costs including IT licensing, software and website hosting charges, professional consultancy, Health and Safety PPE, external training, analysis of samples and specialist services. Where LAS provides office accommodation for LAWPRO staff, the LA receives a hosting contribution from the 25% CMC charge.

LAWPRO's financial oversight is robust, with quarterly reporting to DHLGH and internal audits by Tipperary County Council. Tipperary County Council manages and administers the DHLGH funding allocated to LAWPRO, which is included in the Council's Annual Financial Statement prepared by the Chief Executive and Head of Finance in accordance with the Accounting Code of Practice and accounting policies.

Table 2 Budget projections for 2025¹⁰, 2026¹¹ and 2027-2033

Cost Breakdown	2025	2026	2027	2028	2029	2030	2031	2032	2033
Salary, PRSI (11.05/11.15/11.25%), Pension (13%)	€ 6,906,292	€ 8,148,649	€ 9,562,926	€ 10,112,795	€ 10,694,280	11,309,201	€ 11,959,480	€ 12,647,151	€ 13,374,362
Overhead 25%	€ 1,413,654	€ 1,613,507	€ 1,907,685	€ 2,017,377	€ 2,133,376	€ 2,256,045	€ 2,385,768	€ 2,522,949	€ 2,668,019
Travel & Subsistence	€ 350,000	€ 492,800	€ 505,120	€ 517,748	€ 530,692	€ 543,959	€ 557,558	€ 571,497	€ 585,784
Office Annual Costs	€ 732,439	€ 818,350	€ 838,809	€ 859,779	€ 881,273	€ 903,305	€ 925,888	€ 949,035	€ 972,761
Engagement Initiatives	€ 220,790	€ 436,730	€ 447,648	€ 458,839	€ 470,310	€ 482,068	€ 494,120	€ 506,473	€ 519,135
Community Fund	€ 2,043,525	€ 2,480,000	€ 2,542,000	€ 2,605,550	€ 2,670,689	€ 2,737,456	€ 2,805,892	€ 2,876,040	€ 2,947,941
Capital	€ 310,000	€ 300,000	€ 307,500	€ 315,188	€ 323,067	€ 331,144	€ 339,422	€ 347,908	€ 356,606
TOTAL	€ 11,976,700	€ 14,290,036	€ 16,111,688	€ 16,887,275	€ 17,703,688	€ 18,563,179	€ 19,468,129	€ 20,421,053	€ 21,424,607

LAWPRO proposes the development of a Service Level Agreement (SLA) together with an updated memorandum of funding agreement (MFA) with DHLGH to fully capture the extent of actions being delivered by the programme on behalf of the local government sector, as funded by the Department. This will be in line with best practice guidance available from DHLGH on the delivery of national projects, programme and schemes, which require staffing and funding in the Local Government Sector.

The SLA must also address any situation where the programme might be terminated, and the need for redeployment of staff. This will include an exit plan to mitigate financial risk for lead authorities. The SLA must also outline suitable staffing requirements and qualifications and a mechanism for authorisation of staff under the Water Pollution Act. It is proposed that a review be undertaken, with assistance provided by the Department, given the Minister's role in declaring qualifications under the Local Government Act of the essential qualifications and experience needed by specific resources in this area. This review must be undertaken

¹⁰ 2025 DHLGH Approved

¹¹ 2026 Budget submission to DHLGH approval

as part of the preparation of the SLA; as well as other service delivery functions as required under the Water Framework Directive.

Timeframe

The DHLGH has committed to funding LAWPRO as long as LAWPRO has assigned responsibilities under the Water Framework Directive, River Basin Management Plans and associated directives and national legislation. The work of LAWPRO will therefore be delivered up to and beyond 2027, in support of water management delivery in Ireland.

Governance and Oversight

LAWPRO operates under a robust governance structure including LAWPRO Oversight Committee; Department of Housing and Local Government and Heritage (DHLGH) Water Advisory Unit and the Programme Delivery Office (PDO); the CCMA Environment Climate and Circular Economy Committee (ECCE) and the Water Quality Oversight Group. It provides ongoing updates to Regional Committees, National Technical Implementation Group (NTIG), National Coordination and Management Committee (NCMC) and the Water Policy Advisory Committee.

LAWPRO will work under a formal SLA with DHLGH as reference above to ensure long-term funding commitments, defined roles and responsibilities, exit plans if the programme is discontinued and alignment with national governance structures.

Strategic Benefits

Staff Retention: Regularisation will reduce turnover and protect institutional knowledge

Operational Efficiency: LAWPRO supports local authorities with planning, training, and coordination

Legal Compliance: Helps meet EU obligations and avoid infringement penalties

Strategic Alignment: Supports Programme for Government, climate action, and biodiversity goals

Community Engagement: Supports over 650 community groups with funding and capacity building.

Innovation: Leads projects like Farming for Water and Blue Dot Catchments.

LAWPRO also supports the Natural Waters Business Case (PMO 21/07), which seeks to better resource LA environmental functions. It is also leading the development of Local Authority Water Action Work Plans, which will guide each LA's water-related responsibilities from 2026 onward.

Conclusion

LAWPRO is a proven, effective shared service that strengthens local government capacity to protect and improve Ireland's water environment. The proposed expansion and regularisation will:

- Secure the future of the programme
- Enhance delivery of national water policy
- Support local authorities in meeting their obligations
- Ensure strategic coherence across sectors

The Peer Review Group are asked to support Option 5 to ensure LAWPRO continues to deliver value for the sector and the environment.