

## Republic of Ireland Branch

### **Environmental Protection Agency The National Inspection Plan 2018 - 2021: Domestic Waste Water Treatment Systems**

#### **Background to CIWEM**

CIWEM is the leading independent Chartered professional body for water and environmental professionals, promoting excellence within the sector. The Institution provides independent comment on a wide range of issues related to water and environmental management, environmental resilience and sustainable development.

CIWEM welcomes the opportunity to respond to the Environmental Protection Agency draft of the third National Inspection Plan for the period 2018 – 2021: Domestic Waste Water Treatment Systems. CIWEM's Republic of Ireland Branch has developed this submission in response to this. The Irish branch of CIWEM has been in existence since 1965 and its membership spans public and private organisations for whom water and environmental management is to the fore in their activities.

#### **Introduction**

CIWEM notes that households connected to domestic wastewater treatment systems (DWWTS) are required to register their systems in line with the Domestic Waste Water Treatment Systems (Registration) Regulations 2012. This includes households connected to septic tanks and similar systems. A registration fee covers the costs of administering the register and managing inspections that are carried out under the Water Services (Amendment) Act 2012. The EPA reports that up to 20/10/17, 462,611 DWWTS have been registered. This represents about 95% of the estimated total of 489,069 households which CSO data would indicate.

In addition, arising from 2012 legislation, it is a requirement for owners of domestic wastewater treatment systems to operate and maintain their systems and this includes de-sludging.

For its part, the EPA is tasked with development of a National Inspection Plan and this has comprised a two-strand approach, namely:

- Engagement with the public – to promote understanding and offer appropriate guidance utilising various strategies
- Inspections of DWWTS – a minimum of 1,000 per year and informed by a risk-based approach to site selection

The EPA is responsible for co-ordination and reporting on the implementation of the plan by local authorities. Under the national inspection plan, local authority inspectors are required to undertake a minimum number of inspections each year. Any shortfall in the number of inspections completed at the end of a reporting period are to be carried over and added to the number of inspections to be undertaken in succeeding reporting period.

### Results from 2016

The EPA has published its fifth implementation report (for year 2016), which involves a lookback during that year at the two-strand approach adopted - inspections carried out as well as the findings and follow up actions required; what activities formed part of the public engagement strategy.

In regard to the inspections, the report notes that failures rates of DWWTS were up, with 49% of sites failing inspection in 2016, compared with 45% in 2015. The report notes further that 54% of the of sites that failed inspection in 2016 are now compliant following remedial works.

In regard to public engagement, the report notes that a variety of approaches were adopted to implement the communications strategy. This has included a national working group which inter alia has produced information documentation for the public; at local level, diverse measures include, for example, pop up posters placed in county libraries and information leaflets distributed in GP practices and medical centres waiting rooms.

### NIP Report for 2018-2021 – Observations and Comments

CIWEM fully supports the strategy set out in the National Inspection Plan (and notes its 4-year duration, as opposed to previous 2-year durations of the preceding plans). The two-strand approach sets to promote understanding of the pollution and health risk from DWWTS, whilst also ensuring that a proactive detection system for remedial work is in place.

The results published in the implementation plans confirm the ongoing need for an inspection regime. CIWEM considers it beneficial that inspections include non-registered sites as well as registered sites in the annual target set for each local authority.

The level of failures in the latest implementation report gives some cause for concern, in the context of an annual sample size which is 0.2% of the overall number of sites. Given that the focus of the inspections will be sites in the higher risk category, CIWEM would suggest that consideration be given to the time horizon over which it is envisaged that the failure rate would be reduced significantly. In this regard, it would be desirable that the Plan set out a target level of compliance, post-inspection and post-remedial actions, which is aspired to within the currency of the 4-year plan period.

CIWEM would encourage flexibility in the Plan in regard to the annual inspection rate depending on what level of remedial outcomes are achieved. In addition to appointment of inspectors, CIWEM would advocate a liaison group for inspectors to promote consistency of approach to inspections and this could entail refresher training from time to time within the currency of the Plan.

CIWEM would hope that the level of public engagement be increased should each succeeding year's trend of compliance not proceed in the right direction, or at the appropriate rate. While the range of engagement activities is wide, there may be merit in further expenditure on e.g. a national media campaign, etc.

CIWEM understands that increased levels of activity in either strand of the two-strand approach may cause budgetary pressure for local authorities. While outside the remit of the Plan, CIWEM would hope that the EPA would be in a position to advocate to government for further funding in this regard.

Looking ahead, CIWEM would ask the EPA to consider small-scale domestic treatment plants, constructed wetlands and motorway service areas as further potential inspection candidate sites, albeit though not apparently covered by the DWWTS legislation at present.

In conclusion, CIWEM commends the EPA for establishing the regimes of inspection and public engagement and would fully endorse its proactive management of the inspection process and the public communication strategy through the proposed National Inspection Plan.