



Brussels, 2.10.2026
SWD(2026) 701 final

COMMISSION STAFF WORKING DOCUMENT

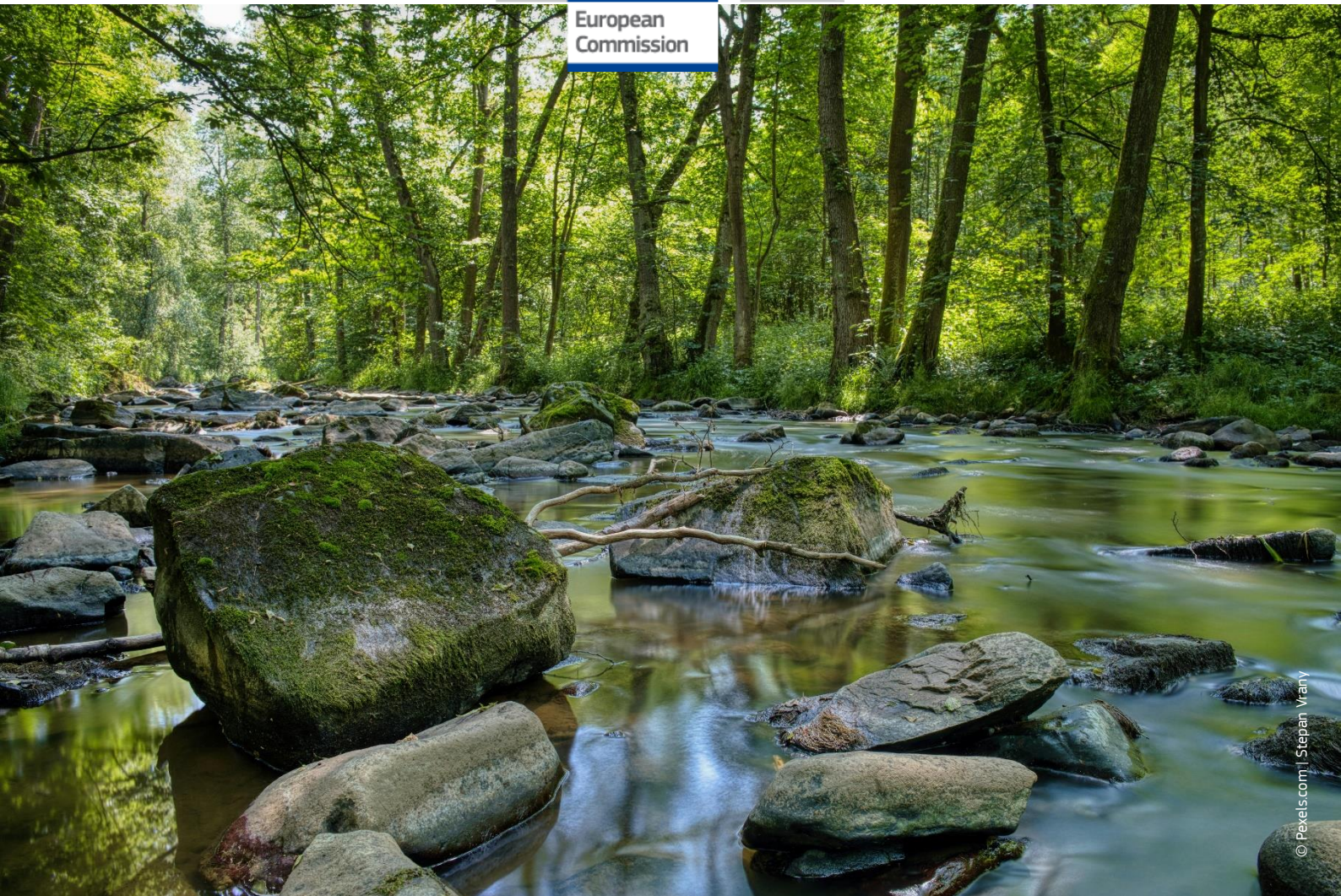
**Third River Basin Management Plans Second Flood Hazard and Risk Maps and
Second Flood Risk Management Plans
Member State: Ireland**

Accompanying the document

**REPORT FROM THE COMMISSION TO THE COUNCIL AND THE EUROPEAN
PARLIAMENT**

**on the implementation of the Water Framework Directive (2000/60/EC) and the Floods
Directive (2007/60/EC)
Third River Basin Management Plans
Second Flood Risk Management Plans**

{COM(2025) 2 final}



Country specific staff working document

Ireland



ENVIRONMENT

Contents

Contents	2
1. General information, Member State characterisation	3
2. Horizontal aspects.....	10
2.1 Governance.....	10
2.2 Characterisation of river basin districts	11
3. Policy elements contributing to biodiversity and climate change adaptation.....	15
3.1 Surface water bodies: what is their ecological status or potential?.....	15
3.2 Hydromorphological changes and artificialisation (HMWBs and AWBs)	17
3.3 Groundwater bodies – have they sufficient water – quantitative status	18
3.4 Protected areas - identification, monitoring, objectives and measures	19
3.5 What is being done to prevent/reduce hydromorphological pressures.....	21
3.6 What Ireland is doing on abstractions and water scarcity	21
3.7 Adaptation to climate change.....	23
4. Policy elements contributing to zero pollution.....	24
4.1 Surface Water Bodies: what is their chemical status?	24
4.2 Groundwater Bodies: what is their chemical status?	26
4.3 What Ireland is doing to combat pollution from agriculture.....	28
4.4 What Ireland is doing to combat pollution from other sectors.....	29
4.5 What Ireland is doing to combat significant pressures – overall assessment of the Programmes of Measures	29
5. Exemptions and economics	31
5.1 To what extent are exemptions applied in Ireland?	31
5.2 Use of economic analysis and water pricing – cost recovery.....	32
6. WFD recommendations.....	34
7. Abbreviations and acronyms.....	37
SECTION B: FLOODS DIRECTIVE.....	38

1. General information, Member State characterisation

The Republic of Ireland ('Ireland') is situated next to the Atlantic Ocean, to the west of continental Europe. It has 5.4 million inhabitants and an area of 69 947 square kilometres¹. This is a lower population density than the EU average but one with very high regional disparities.

Ireland has a long coastline and shares a border and two catchment areas with Northern Ireland (UK). It has a sizeable central plain surrounded by coastal upland. The rain patterns and water availability in Ireland are very much influenced by its position in the Atlantic Ocean. This yields a temperate maritime climate with mild winters and cool summers, with significant rainfall and frequent cloud cover and rare seasonal extremes. The most marked features are heavy Atlantic-driven rainfall and dense hydrological networks. Prevailing winds cause more rain to fall on the western coast and mountainous uplands than in the east and southeast. The country relies considerably on groundwater bodies for its drinking water supply.

The percentages of Ireland's territory and population that are rural are higher than the EU average. Grassland accounts for approximately 82.2% of Ireland's utilised agricultural area, which is the highest proportion in the European Union. Indeed, livestock rearing accounts for over 70% of the country's agricultural output. The share of organic farming is considerably lower than the EU average. The share of land under protected areas covers around 14% of the territory, which is significantly less than the EU average.

Ireland has three river basin districts (RBDs), two of which (Neagh Bann and North Western) are international RBDs.

¹ Eurostat – Area by NUTS 3 region: <https://ec.europa.eu/eurostat/databrowser/bookmark/fabcfca6-4abb-4a84-ac1c-7bb335af436a?lang=en>



Table A. Overview of Ireland's river basin districts (RBDs)

RBD	RBD name	Size (km ²)	Countries sharing RBD
IEGBNIIENB	Neagh Bann	2 538.043	UK
IEGBNIIENW	North Western	10 701.95	UK
IEROI	Republic of Ireland	72 095.773	N/A

Note: IEROI is a single national RBD into which the two others are incorporated.

Table B. Transboundary river basins by category and percentage share in Ireland

Name of international river basin	National RBD	Countries sharing RBD	Coordination category	
			4	
			km ²	%
Neagh Bann	IEGBNIIENB	UK	2 538.043	31%*
North Western	IEGBNIIENW	UK	10 701.95	69%*

Source: WISE electronic reporting

Category 1: International agreement, permanent cooperation body and international RBMP in place.

Category 2: International agreement and permanent cooperation body in place.

Category 3: International agreement in place.

Category 4: No cooperation formalised.

*Note: This percentage was calculated using data from the third RBMP e-reporting for Ireland and draft third RBMP pdf for Northern Ireland.

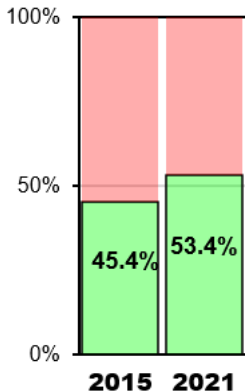
Reporting

The deadline for reporting the third River Basin Management Plans (RBMPs) was March 2022. The Commission and the European Environment Agency (EEA), together with Member States, developed a voluntary electronic reporting system called WISE (Water Information System for Europe). Some Member States used it to fulfil their obligations; others submitted their plans only in pdf format.

Ireland submitted a single national RBMP ('Water Action Plan 2024') in pdf format to the European Environment Information and Observation Network (EIONET) in September 2024 and a series of supporting pdf documents in January 2025. Electronic reporting was completed in January 2025. This was not in line with the deadlines established in the Water Framework Directive (WFD).

The documents are available in the EIONET central data repository: <https://cdr.eionet.europa.eu/>.

Table C. Surface water bodies - changes in status, pressures, exemptions, and measures

Surface water bodies	Trend (% good status/potential)	Main changes, pressures and exemptions
The total number of surface water bodies (SWBs) delineated has increased slightly since the second RBMP, from 4 310 to 4 327 as a result of 16 additional river bodies and one additional lake in the e-reporting (which could be erroneous).		
ECOLOGICAL STATUS	 100% 50% 0% 2015 2021 45.4% 53.4%	There has been an improvement in the ecological status of SWBs, with the percentage of SWBs in good status increasing from 45.5% of total SWBs reported in the second RBMP to 53.4% in good or high status in the third RBMP. However, (i) in 2015, the ecological status of 25% of SWBs was reported as unknown², whereas in 2021 there were no unknowns, and (ii) in 2009, 54% of SWBs already had good status (3% unknown). A slight downward trend over the 12-year period as a whole and into the following period (up to 2024) is confirmed by the Irish Environmental Protection Agency³. In 2021, confidence in the classification of SWBs in high status was about 50:50 with high and low confidence. Confidence in the classification of SWBs in good or poor status was lower than in 2015, i.e. the percentage of those SWBs classified with high confidence decreased, whereas that classified with low or medium confidence increased. In Ireland, operational monitoring is carried out in a higher percentage of water bodies compared to surveillance monitoring (e.g. only 6.5% of river length is covered under surveillance monitoring, whereas 75.8% is covered by operational monitoring). The 'one-out-all-out' principle is applied to the assessment of classification, but many biological, hydromorphological, and physico-chemical quality elements which the WFD requires to be monitored are not monitored in Ireland or only monitored in a small proportion of water bodies. According to the electronic reporting, Ireland forecasts that by 2027, 98.7% of SWBs are expected to achieve good ecological status. The main pressures affecting SWBs are diffuse pollution from agriculture (28% of SWBs) and then physical alteration of the channel / bed / riparian area / shore due to agriculture (10%). This has not changed since the second RBMP (although the pressures affected a lower percentage of SWBs). 60% of SWBs are still affected by unknown anthropogenic pressures. Ireland has mapped key type measures (KTMs) and provided gap indicators⁴ for these 60% of SWBs. Mapping of KTMs identified 215 SWBs to which KTM14 (Research, improvement of knowledge base reducing uncertainty) should be applied. Furthermore, for nutrient pollution (linked with diffuse pollution from agriculture), the background document 'Targeting Measures for Water Quality Outcomes' presents a gap assessment and includes more details on the actual measures and what they are expected to achieve. For measures that could reduce the pressure of physical alteration of the channel / bed / riparian area, ecological flows (e-flows) are partially defined and implemented for selected water bodies, with ongoing work referenced in the third RBMP.

² [Surface water bodies: Ecological status or potential \(third, second and first RBMP\), by country \[chart\] | Water Framework Directive experts' dashboards | WISE Freshwater](#)

³ [Water Quality in Ireland 2019-2024](#) and [EPA: Water Quality in Ireland 2019-2024 - Catchments.ie - Catchments.ie](#)

⁴ A gap indicator is a metric/tool used to identify and measure the difference (gap) between a current state and a desired state of a water body.

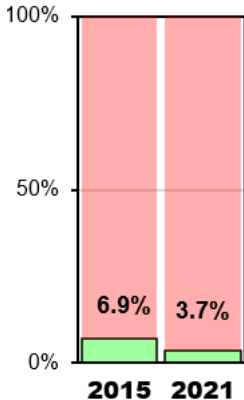
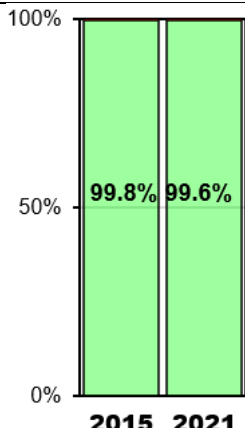
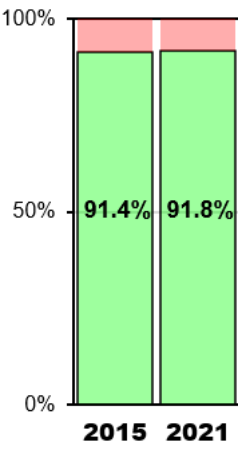
		Time-extension exemptions have been applied to 1 953 SWBs (45.1%) on the grounds of technical infeasibility (Article 4(4)). Less stringent objectives have been set for seven (0.16%) water bodies in the current programming period on the grounds of infeasibility (Article 4(5)).
CHEMICAL STATUS	 100% 50% 0% 6.9% 3.7% 2015 2021	Overall, the chemical status of Ireland's SWBs has remained poor. The low share of SWBs with good chemical status in the second RBMP (6.9%) decreased even further (to 3.7%) in the third RBMP. The status of most (92.5%) SWBs is unknown. For the remaining SWBs, confidence in the classification is good (7%) or medium/low (0.5%). Since the second RBMP, the coverage of the operational monitoring network has increased to 75.8% of rivers (by length), and 88.3% of lakes (by area), 17.6% of coastal water bodies (by area), and 32.7% of transitional water bodies (by area). This compares with 5% of rivers, 7% of lakes, 8% of coastal water bodies, and 15% of transitional water bodies in the second RBMP. There is less emphasis on surveillance monitoring. The number of monitored priority substances varies by water body type. 23 substances are monitored in rivers and lakes (14 from the original 2008 list of 33 substances, and 9 from the 12 substances added in 2013). 36 substances are monitored in transitional and coastal water bodies (25 from the original 2008 list of 33 substances, and 11 from the 12 substances added in 2013). In the 3.8% of SWBs classified as being in poor status, the main reason is exceedance of the Environmental Quality Standard (EQS) for ubiquitous, persistent, bioaccumulative and toxic (uPBT) substances, namely polycyclic aromatic hydrocarbons (PAHs), with benzo(a)pyrene ranked first for causing at least 1.5% of SWBs to fail to achieve good chemical status. The next two most significant substances, polybrominated diphenyl ethers (PBDEs) and mercury, cause respectively at least 1.4% and 1.3% of all water bodies to fail. According to the electronic reporting, Ireland forecasts that by 2027 5.8% of SWBs will be in good chemical status and 92.6% will remain unclassified. Ireland has mapped the priority substances causing failure to either KTM4 (Remediation of contaminated sites) or KTM15 (Phasing out/Reduction of emissions, discharges and losses of Priority Hazardous Substances / Priority Substances). A gap indicator has also been provided. Time-extension exemptions have been applied to 104 SWBs (2.4%) on the grounds of technical infeasibility and to 71 SWBs (1.6%) on the grounds of natural conditions (Article 4(4)). Less stringent objectives have been set for two SWBs (0.05%) in the current programming period on the grounds of infeasibility (Article 4(5)).

Table D. Ground water bodies - changes in status, pressures, exemptions, and measures

Groundwater bodies	Trend (% good status/potential)	Main changes, pressures and exemptions						
The number of groundwater bodies (GWBs) delineated has increased slightly from 513 to 514 because of the delineation of a new GWB in the third RBMP.								
QUANTITATIVE STATUS	 <table><tr><th>Year</th><th>% good status/potential</th></tr><tr><td>2015</td><td>99.8%</td></tr><tr><td>2021</td><td>99.6%</td></tr></table>	Year	% good status/potential	2015	99.8%	2021	99.6%	Ireland's GWBs have largely stayed in good quantitative status. The slight decrease in the proportion of GWBs in good quantitative status results from two GWBs being in poor quantitative status in 2021 (compared with one GWB in 2015). As regards monitoring, the number of GWBs with quantitative monitoring is 50 out of 514 in total (i.e. 9.7% of total GWBs and 24.3% of the total GWB area). In the second RBMPs, quantitative monitoring was conducted in 45 out of 513 GWBs (8.8%). Expert judgment is used based on supporting evidence (e.g. signs of saline intrusion or ecological impact). Both groundwater-associated aquatic ecosystems (GWAAEs) and groundwater-dependent terrestrial ecosystems (GWDTEs) are considered in the status assessment, as they were in the second RBMPs. Two GWBS failed to achieve good quantitative status in 2021. One failed because the long-term annual average rate of abstraction exceeds the available groundwater resource, he other because of significant damage to terrestrial ecosystems. Ireland has taken additional measures to maintain good quantitative status overall, with permits and registers of groundwater abstractions. It is also planning measures (for the next round of reporting) such as aquifer storage and recovery systems, as a potential future measure to enhance water resilience (KTM7 - Improvements in flow regime and/or establishment of ecological flows). Confidence in the classification of quantitative status has decreased since the second RBMP: all GWBs are now reported to have no information/ missing data for confidence (while the second RBMP reported high/medium confidence)⁵. A time-extension exemption on the grounds of technical infeasibility (Article 4(4)) has been applied to the two GWBs (0.4%) which are currently failing to obtain good status. No GWB is expected to fail to achieve good quantitative status by 2027.
	Year	% good status/potential						
	2015	99.8%						
	2021	99.6%						

⁵ Ireland has since explained that this was a reporting error, but has not provided details, only stating that confidence was similar to that reported in the second RBMP.

CHEMICAL STATUS	 The bar chart displays the percentage of Groundwater Bodies (GWBs) in good chemical status for the years 2015 and 2021. The vertical axis represents the percentage from 0% to 100%. For 2015, the green bar reaches 91.4%. For 2021, the green bar reaches 91.8%. A small red segment is visible at the top of each bar, representing the percentage of GWBs not in good chemical status.	The chemical status of GWBs is reported as largely good, with a slight increase since the second RBMP, namely from 91.4% of GWBs to 91.8%. Confidence in the classification of chemical status has decreased since the second RBMP, with over 90% of GWBs now without a confidence assessment, while in the second RBMP confidence was mostly medium to high⁶. 76.3% of GWBs are still not subject to chemical (surveillance and/or operational) monitoring, similar to the 76.4% reported in the second RBMP, and the numbers of both surveillance and operational monitoring sites have decreased. Both GWAAEs and GWDTEs are used for assessment, as they were in the second RBMPs. Ireland has set threshold values for the assessment of chemical status of GWBs, but not for all substances which could cause them to fail to meet the environmental objectives. In particular, Ireland has not set threshold values for all Annex II (Part B) substances⁷. It has set threshold values for trichloroethylene and tetrachloroethylene, but not for their sum. 42 GWBs are in poor chemical status due to significant environmental risk from pollutants. Other reasons for GWBs failing to achieve good chemical status are: (i) the deterioration in quality of waters for human consumption; (ii) the failure to achieve environmental objectives (Article 4 WFD) in associated SWBs or significant diminution of the ecological or chemical status of such SWBs; and (iii) the significant damage to terrestrial ecosystems which depend directly on GWBs. The top five pollutants causing failure to achieve good chemical status in GWBs are ammonium (3.1% of all GWBs), trichloroethylene (1.4% of all GWBs), zinc (0.8% of all GWBs), nitrate (0.8% of all GWBs) and lead (0.8% of all GWBs). Ireland has mapped chemical parameters in groundwater to several measures, namely to KTM4 (Remediation of contaminated sites) and KTM14 (Research, improvement of knowledge base), and indicated the gap to achieving good status. A time-extension exemption on the grounds of technical infeasibility (Article 4(4)) has been applied to 40 GWBs (7.8%). Less stringent objectives have been set for two GWBs (0.4%) in the current programming period on the grounds of infeasibility (Article 4(5)).
-----------------	---	--

⁶ Ireland has since explained that this was a reporting error, but has not provided details, only stating that confidence was similar to that reported in the second RBMP.

⁷ According to the third RBMP e-reporting (GWMET_thresholdvalue), no threshold values were reported for cadmium in any of the 3 RBDs or for total phosphorus in 2 out of 3 RBDs (Neagh Bann RBD and North Western RBD). Ireland has since clarified that no threshold value was set for cadmium because it has not been identified as posing a risk to the achievement of good status for any GWB. Cadmium is included in routine monitoring.



2. Horizontal aspects

2.1 Governance

A large range of authorities are involved in preparing and implementing Ireland's RBMP; the key authorities include the Department for Housing, Local Government and Heritage (DHLGH), Environmental Protection Agency (EPA), local authorities (supported by the Local Authorities' Water Programme (LAWPRO)), National Coordination and Management Committee, and regional committees. Governance improvements include formal committees and a greater scientific role for LAWPRO. The single national RBD, which incorporates the two international RBDs, is divided into 46 catchment management units which are further divided to create 538 sub-catchments.

The third RBMP was subject to consultation which involved national and local meetings, media and digital campaigns. Changes made after the consultation include strengthened governance arrangements, the development of 'Catchment Management Work Plans', and the establishment of a dedicated Programme Delivery Office within the DHLGH's Water Division. The role of that office is to oversee the implementation of the programme of measures and facilitate effective communication across various governance structures. The results of the consultation are detailed in a separate report, although the third RBMP does not provide specifics on how the comments were addressed or whether justifications were provided.

The two RBDs, North Western and Neagh Bann RBDs, that are shared with Northern Ireland in the UK are managed partly through the North/South Ministerial Council and the North/South Water Quality Coordination Group. Despite the UK's withdrawal from the EU, existing administrative arrangements remain, ensuring ongoing alignment across shared waters. A collaborative 'Shared Waters' document is being developed, though it is not mentioned in the third RBMP because it was initiated after the plan's completion⁸. These mechanisms facilitate transboundary cooperation, but the third RBMP does not specifically address joint action on water abstraction or scarcity issues.

Ireland stresses that it was important to identify and understand links to other policy areas during the development of the third RBMP. It states that the development was informed by the 'strategic environmental assessment' process, which details the plans and programmes that interact with and influence the river basin management planning process. The policy areas mentioned as relevant include land use and spatial planning, climate change, flood protection, water services policy, waste management, agriculture, fisheries, forestry and peatlands. Accordingly, Ireland says that the objectives in the third RBMP are linked to the objectives in its plans on Climate Adaptation, Marine Spatial Planning, Flood Risk Management and Biodiversity. Ireland also reports that it is seeking to include WFD objectives in those other plans to support further policy integration.

A good example is the coordination between the planning tools under the Marine Strategy Framework Directive (MSFD) and the WFD. Ireland demonstrates a clear awareness of the strong link between improved upstream land management and direct benefits to coastal waters, supporting the MSFD objectives, and the third RBMP itself is included as a measure in Ireland's programme of measures for the MSFD. Ireland's commitments in that programme also include the development of nature-based solutions for nutrient sequestration in coastal ecosystems, with actions coordinated through

⁸ The need to finalise it is mentioned in the ['Water Action Plan 2024 Interim Review Report.pdf'](#)

the OSPAR regional framework⁹. The National Marine Planning Framework aligns with both the WFD and MSFD to promote an ecosystem-based approach.



2.2 Characterisation of river basin districts

Water bodies

A total of 4 327 surface water bodies (SWBs) are delineated based on natural hydrological and geographical boundaries, ensuring that each unit is coherent in terms of ecological processes and management needs.

The number of groundwater bodies (GWBs) has not significantly changed between the second and the third RBMPs (513 and 514, respectively) but there is a slight increase in total area, and 36 transboundary GWBs¹⁰ are shared with the UK. Strikingly, the large majority of waterbodies seem to be concentrated in the Neagh Bann RBD in the north-east of the country and which covers roughly 2 000 km² in Ireland and 6 000 km² in Northern Ireland (UK).

Table E. Water bodies delineated in Ireland

RBD Name	Rivers	Lakes	Transitional	Coastal	Territorial	Groundwater
Republic of Ireland	95	15	9	4	0	18
North Western	395	239	23	24	0	61
Neagh Bann	2 718	557	164	84	0	435
Total in Ireland	3 208	811	196	112	0	514

Source: WISE electronic reporting

Main pressures and impacts

In Ireland, hydromorphological pressures are identified for rivers, lakes and transitional water bodies in all three RBDs. Pressures include physical alteration of channel/bed/riparian area/shore, abstraction or flow diversion, dams, barriers and locks. The sectors reportedly behind these pressures include public water supply, flood protection and agriculture.

Other key pressures in Ireland come from several sectors, including agriculture, urban wastewater, urban runoff, invasive alien species (such as curly waterweed, Chinese mitten crab, zebra mussel)

⁹ OSPAR is the mechanism by which 15 national governments and the European Union cooperate to protect the marine environment of the North-East Atlantic.

¹⁰ The GWBs characterised as transboundary in the third RBMP are IEBN14NB009, IEBN1_NB_G_011, IEBN1_NB_G_014, IEBN1_NB_G_007, IEBN1_NB_G_019, IEBN14NW003, IEBN1_NW_G_013, IEBN1_NW_G_031, IEBN1_NW_G_039, IEBN1_NW_G_025, IEBN1_NW_G_014, IEBN14NW022, IEBN1_NW_G_011, IEBN1_NW_G_059, IEBN1_NW_G_044, IEBN1_NW_G_028, IEBN1_NW_G_010, IEBN14NW020, IEBN1_NW_G_005, IEBN1_NW_G_021, IEBN1_NW_G_040, IEBN1_NW_G_033, IEBN1_NW_G_035, IEBN1_NW_G_032, IEBN1_NW_G_036, IEBN1_NW_G_009, IEBN1_NW_G_034, IEBN1_NW_G_017, IEBN14NW008, IEBN1_NW_G_048, IEBN1_NW_G_063, IEBN1_NW_G_027, IEBN1_NW_G_012, IEBN1_NW_G_030, IEBN1_NW_G_051 and IEBN1_NW_G_015.

and aquaculture (Figure 1). 0%¹¹ of SWBs and 5% of GWBs are apparently affected by unknown anthropogenic pressures, so further work on pressure assessment is needed to identify them and determine their significance.

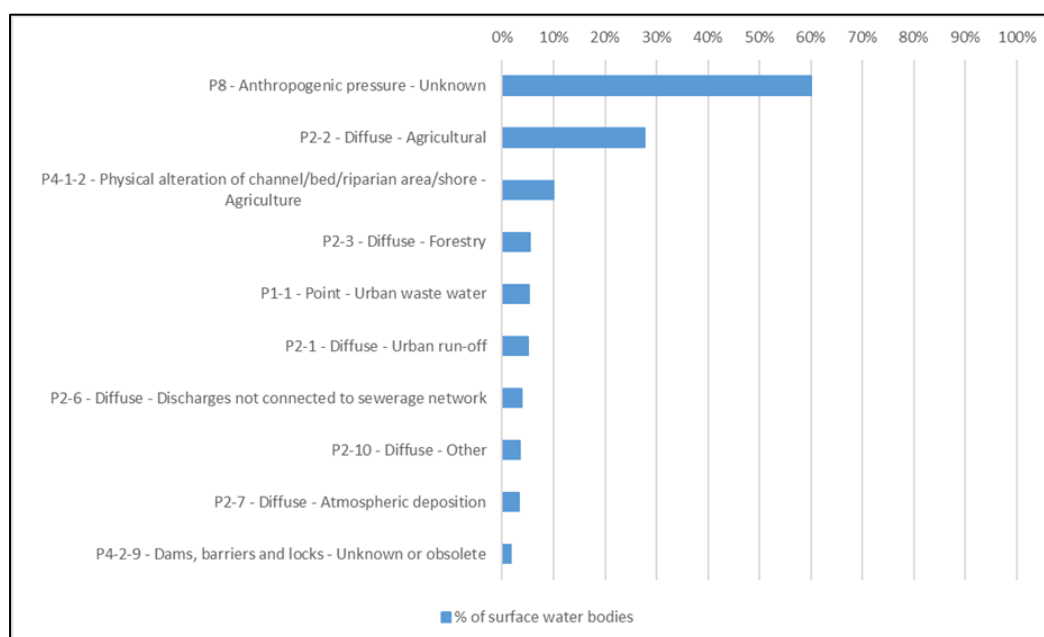
Nutrient pollution from agriculture and urban settlements clearly has the most widespread impact, seen in 33% of SWBs and 15% of GWBs (Figure 2). This is a deterioration compared to the second RBMP, when nutrient pollution affected 24% of SWBs and 11% of GWBs.

The pressure from agriculture on SWBs has increased since the second RBMP, growing from 17% to at least 28% of SWBs affected. Conversely, GWBs appear less affected by diffuse pollution from agriculture in the third RBMP (9%, down from 13% in the second RBMP), though that is still the most significant identified pressure.

The excess of nutrients discharged into surface waters leads to eutrophication, causing algal blooms and oxygen depletion. Under the Nitrates Directive, Ireland reported¹² that 21.8% of rivers and 45% of lakes and reservoirs across the country were eutrophic or at risk of becoming eutrophic (Figure 3). Ireland benefits from a derogation under the Nitrates Directive and can spread more than 170 kg of nitrogen per hectare per year as manure in certain areas.

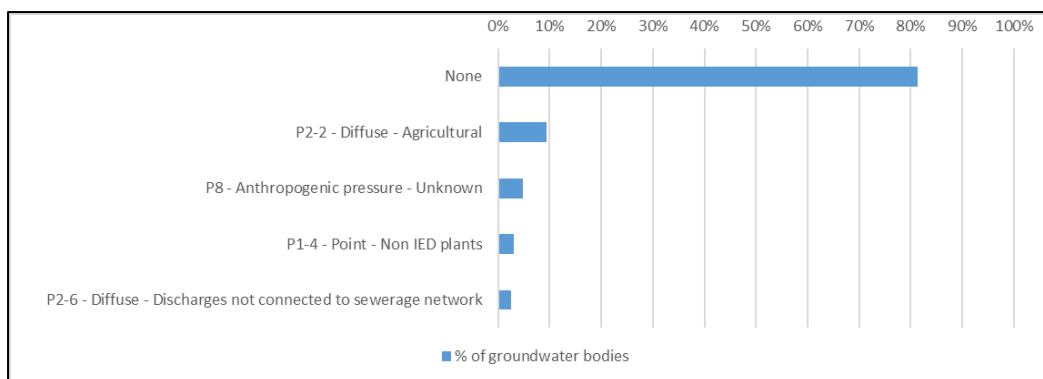
In this context it is worth noting that Ireland's shared stakeholder-led strategy for the agri-food sector ('Food Vision 2030', published in 2019 and currently under mid-term review) includes a target to reduce nutrient losses from agriculture to waterbodies by 50% in 2030.

Figure 1. The most significant pressures on SWBs and GWBs in Ireland in the third RBMP (expressed as percentages of numbers of water bodies)



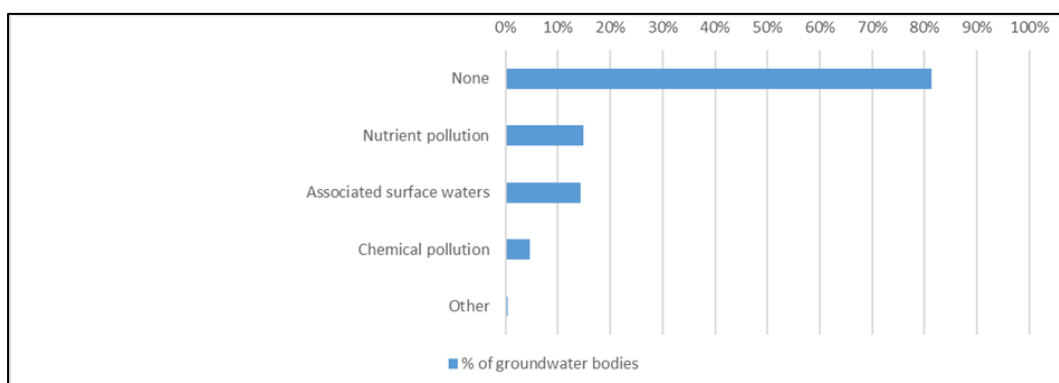
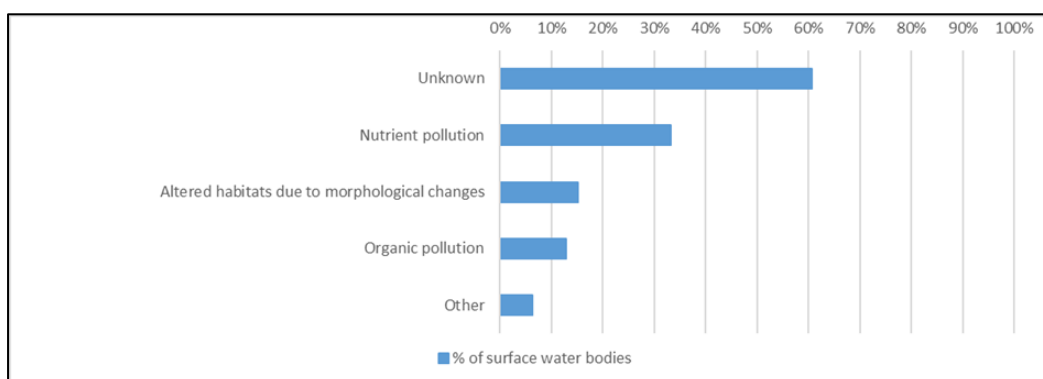
¹¹ In the electronic data, 60% of SWBs are reported to be affected by unknown anthropogenic pressures, but Ireland has since explained that the electronic data are not correct and that approximately 10% of SWBs are affected by unknown anthropogenic pressures.

¹² [Implementation of the Nitrates Directive: Country Reports – Environment](#) (2020-2023)



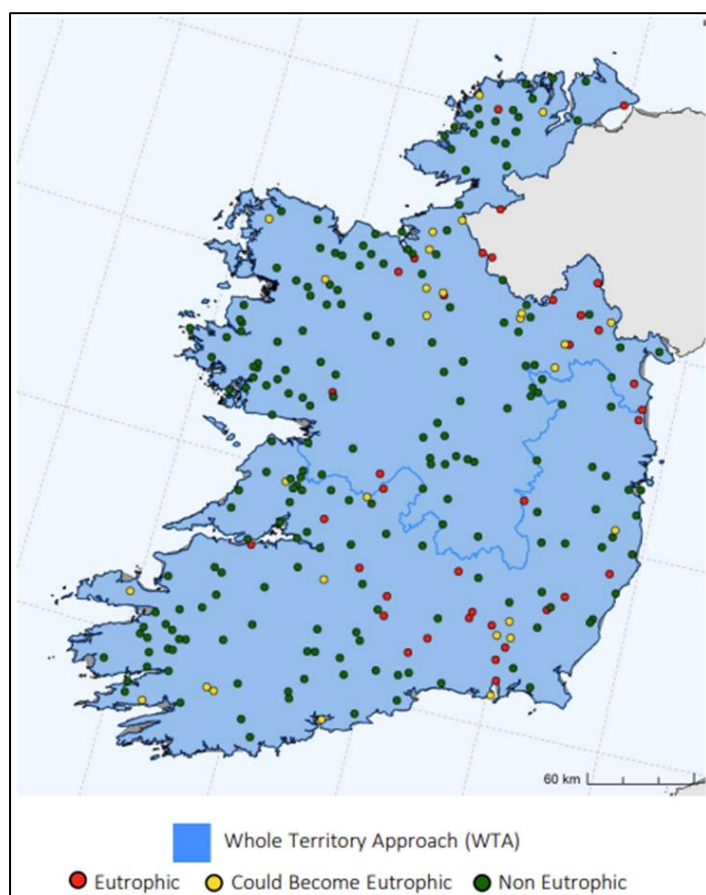
Source: WISE electronic reporting. Note: Ireland has since explained that while the electronic reporting shows over 60% of SWBs as being affected by unknown pressures, in reality the percentage of SWBs with an unknown pressure is approximately 10%. The 60% is because a pressure had to be reported for any waterbody that had unknown chemical status. An impact was also reported.

Figure 2. The most significant impacts on SWBs and GWBs in Ireland in third RBMP (expressed as percentages of numbers of water bodies)



Source: WISE electronic reporting. Note: Ireland has since explained that while the electronic reporting shows over 60% of SWBs as being affected by unknown impacts, in reality the percentage of SWBs with an unknown impact is approximately 10%. The 60% is because a pressure had to be reported for any waterbody that had unknown chemical status, and, an impact was also reported.

Figure 3. Map of the monitoring points showing eutrophication assessment in Ireland, according to the reporting under the Nitrates Directive¹³.



The dashboard for 'Food Vision 2030' establishes a target of 7.5% of the utilised agricultural area to be under organic farming. The actual percentage under organic farming was a little over 2% in 2021, one of the lowest in the EU, but has been steadily increasing since then, to 4.97% in 2024¹⁴.

Ireland has carried out a gap analysis regarding the measures required to address all the specific pressures identified.

Type-specific reference conditions

The WFD requires EU countries to set type-specific reference conditions for biological quality elements and type-specific conditions for hydromorphological and physico-chemical quality elements. These are the values of these quality elements that correspond to high ecological status. Ireland's progress on this obligation is insufficient.

Ireland has established type-specific reference conditions for almost all river and lake types (98%). and all transitional and coastal types for some BQEs, it has not established any type-specific conditions for hydromorphological quality elements or physico-chemical quality elements for rivers or lakes, and 25% of the coastal types still lack type-specific conditions for hydromorphological

Source: NITRATES DIRECTIVE - Reporting Period 7 (2016-2019) – trophic status:
<https://water.jrc.ec.europa.eu/portal/apps/dashboards/cb6034c2a75e4df282f8a62f90c16caa> For more recent (2020-2023) data, see [Implementation of the Nitrates Directive: Country Reports - Environment](#)

¹⁴ [\[sdg 02 40\] Area under organic farming](#)

quality elements. Ireland explained that for rivers and lakes, physico-chemical quality elements are assessed against a national standard and that the hydromorphological assessment is not dependent upon type-specific conditions.

Inventories of emissions, discharges, and losses of chemical substances

Ireland has identified the emissions of 16 substances as relevant at RBD-scale, but only 10 of them are included in the emissions inventory.

3. Policy elements contributing to biodiversity and climate change adaptation



3.1 Surface water bodies: what is their ecological status or potential?

Monitoring

There are two main types of monitoring: i) operational monitoring to determine the status of all water bodies at risk of not reaching the environmental objectives and ii) surveillance monitoring aimed rather at providing an assessment of the overall surface water status within the river basin district, as well as identifying impacts and long-term changes. Ireland explained that its national surveillance monitoring network provides information on all relevant quality elements, and that the operational network focuses on targeting issues such as nutrient pollution by looking at the most sensitive quality elements

Ireland's 'National Water Quality Monitoring Programme for 2022-2027' covers 2 778 surface water bodies, comprising 2 429 rivers, 224 lakes, 80 transitional waters, and 45 coastal waters. The operational monitoring covers a greater percentage of water bodies than the surveillance monitoring. The surveillance monitoring covers 7% of river length, 68% of lake area, 32% of transitional area and 12% of coastal area, while operational monitoring covers 76% of river length, 88% of lake area, 33% of transitional area, and 18% of coastal area.

There are significant gaps as regards the quality elements monitored.

One concern is that some of the required biological quality elements are scarcely covered.

- In rivers, macrophytes are monitored at only 2% of monitoring sites, phytobenthos at 7%, and fish at 5%. However, there is almost complete coverage of benthic invertebrates, at 98% of the monitoring stations in rivers.
- In lakes, macrophytes are monitored at 84% of monitoring sites, but benthic invertebrates at just 6%, and fish at 9%.
- In transitional waters, phytoplankton are monitored at 31% of monitoring sites, benthic invertebrates at 18%, fish at 10%, angiosperms at 3%, and macroalgae at 6%.
- In coastal waters, phytoplankton are monitored at 31% of monitoring sites, benthic invertebrates at 29%, angiosperms at 4%, and macroalgae at 21%.

Despite being required by law, not all the physico-chemical or hydromorphological quality elements are monitored. The only hydromorphological quality elements monitored are hydrological regime in lakes and rivers and tidal regime in coastal waters.

As for physico-chemical quality elements:

- in coastal and transitional waters, transparency, thermal conditions, salinity conditions, and acidification are not monitored;
- in lakes, transparency and salinity are not monitored and/or not reported;
- in rivers, thermal and salinity conditions are not monitored.

For the physico-chemical quality element nutrient conditions, it should be noted that coastal and transitional waters are only monitored for phosphorus but not for nitrogen. Monitoring both phosphorus and nitrogen is not mandatory under the WFD but this would certainly be essential for Ireland because agriculture is its main known pressure. River-basin-specific pollutants (RBSPs) are monitored across the four water categories.

Status assessment

One significant concern is that the assessment of ecological status for some SWBs does not include any biological quality elements. This is the case for 2% of river water bodies, 34% of transitional water bodies, and 46% of coastal water bodies. The assessment for all lakes takes at least one biological quality element into account.

The percentage of SWBs whose ecological status or potential was reported as unknown decreased from 25% in the second RBMP ¹⁵ to only 1.3% in the third RBMP. At the same time, the percentage of SWBs reported as being in less than good ecological status or potential increased from 29.9% in the second RBMPs to 45.2% in the third RBMPs. However, it is difficult to establish a trend in the achievement of environmental objectives because of the change in the percentage of unknowns, which in the first RBMP was already only 3%..

The percentage of SWBs in good or high ecological status was 54% in 2009, 45.4% in 2015 and 53.4% in 2021 (Figure 4). This slight downward trend over the 12-year period as a whole and into the following period (up to 2024) was confirmed by the Irish Environmental Protection Agency¹⁶.

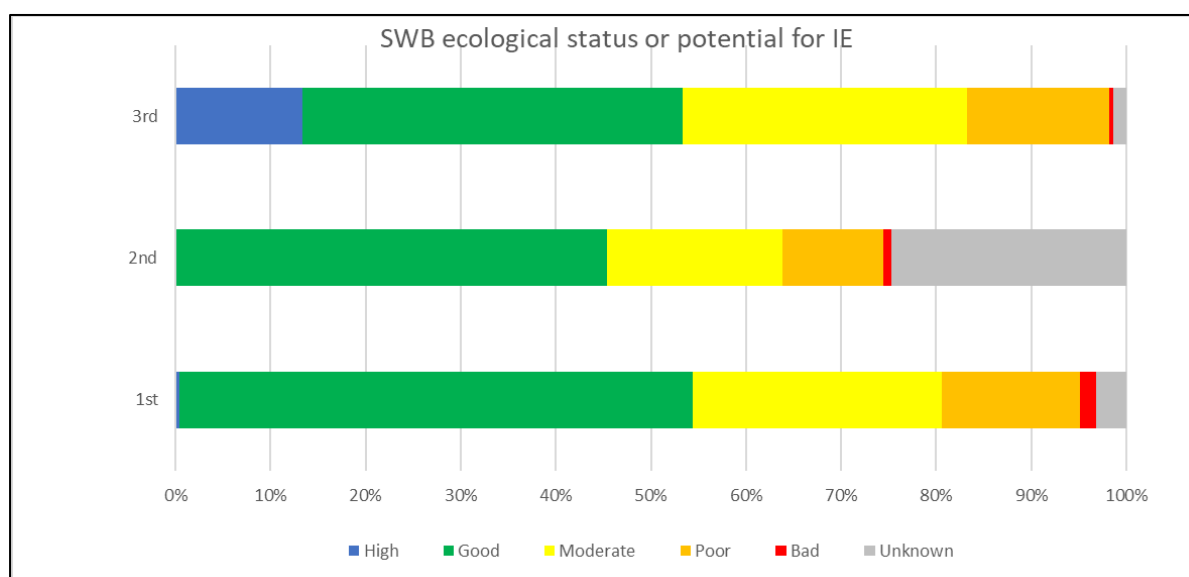
The percentage of status classifications with low confidence has substantially increased since the second RBMP. On the other hand, there has been a substantial decrease in the percentage of classifications for which the level of confidence is unknown.

Ireland forecasts that 98.7% of SWBs will be in good or better ecological status or potential by 2027 and the status of the remainder (1.3%) will still be unknown.

¹⁵ [Surface water bodies: Ecological status or potential \(third, second and first RBMP\), by country \[chart\] | Water Framework Directive experts' dashboards | WISE Freshwater](#)

¹⁶ [Water Quality in Ireland 2019-2024](#) and [EPA: Water Quality in Ireland 2019-2024 - Catchments.ie - Catchments.ie](#)

Figure 4. Ecological status or potential of SWBs in Ireland in the first, second, and third RBMPs.



Source: WISE electronic reporting.

Note: Ireland has since explained that by 2027 between 150 and 300 additional water bodies are forecast to achieve their ecological status objectives, which is lower than the forecast in the electronic data.



3.2 Hydromorphological changes and artificialisation (HMWBs and AWBs)

Hydromorphological characteristics of SWBs concern the hydrological conditions (e.g. quantity and dynamics of water flow, connection of rivers and lakes to GWBs, wave exposure of transitional and coastal water bodies), the morphological conditions (e.g. depth, and width variation, structure and substrate of the bed, structure of the riparian zone), and for river water bodies, river connectivity.

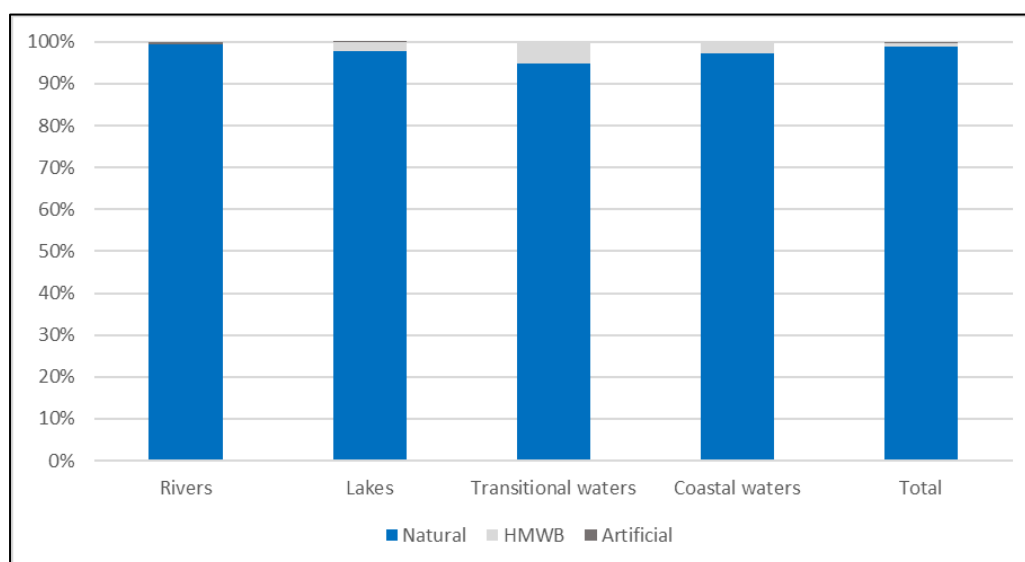
Some SWBs have been so heavily impacted by human activities that achieving good ecological status would entail significant adverse effects on the wider environment or sectors such as navigation, flood protection, hydropower, and irrigation. In such cases, Member States can designate these waterbodies as heavily-modified water bodies (HMWBs) or artificial water bodies (AWBs). Bodies with those two designations are subject to a lower environmental objective than good ecological status, namely 'good ecological potential'. The main reasons for designating water bodies as highly modified is because they are adapted for hydropower generation, drinking water supply or transport use. Less common reasons are their adaptation for other urban development or wider environmental purposes (nature protection and other ecological uses) or 'other' uses. The approach followed in Ireland under the third RBMP follows a structured national methodology broadly aligned with guidance developed at EU level, but the analysis sometimes lacks detail.

As illustrated in Figure 5, the level of human intervention in the water system in Ireland is very limited. It remains a largely natural system. Only 33 water bodies have been designated as heavily modified (4 rivers, 16 lakes, 10 transitional waters and 3 coastal waters). and only 17 water bodies as artificial (16 rivers and 1 lake). The number of HMWBs is the same as in the second RBMP, but the number of AWBs has increased by 2.

According to the status assessment, the ecological potential of 14 HMWBs is good, 13 moderate, 4 poor, and 2 unknown. All 17 AWBs have good ecological potential. The methodology for assessing good ecological potential for HMWBs and AWBs in Ireland is applied consistently across all RBDs and

follows guidance developed at EU level¹⁷. It identifies the maximum ecological potential that a water body can achieve and the list of associated measures. Good ecological potential is then defined as corresponding to the achievement of these measures. The measures are set based on standardised national technical reviews, but the RBMP acknowledges that further refinement is needed in some cases where site-specific validation of mitigation feasibility is still unconfirmed. Accordingly, confidence in the methodology is moderate to high.

Figure 5. The proportion of natural, heavily-modified, and artificial water bodies by water category and total



Source: WISE electronic reporting



3.3 Groundwater bodies – have they sufficient water – quantitative status

Monitoring

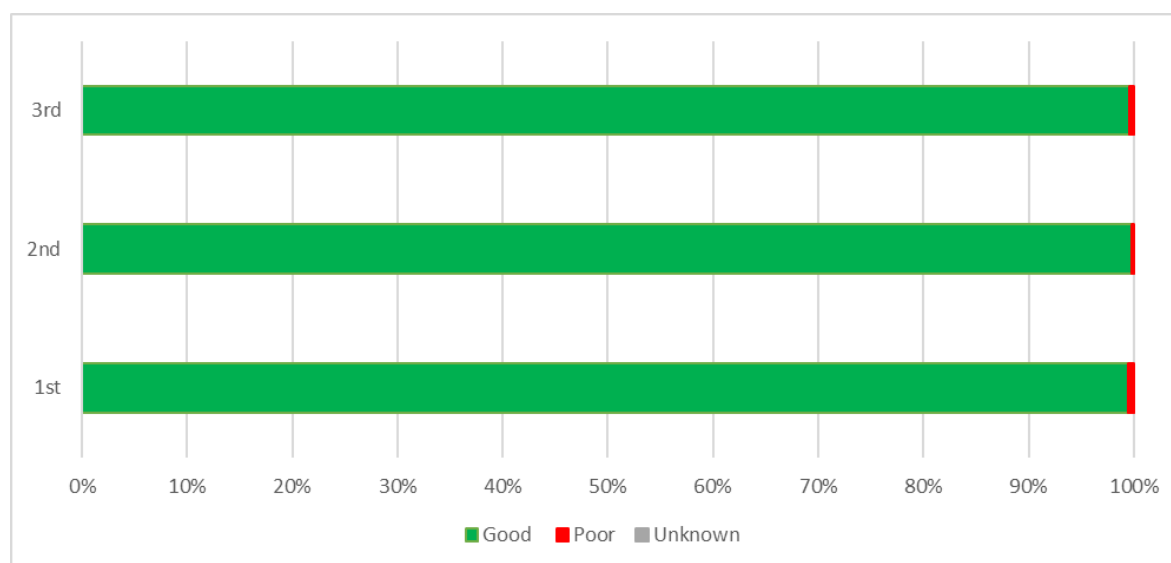
Quantitative monitoring covers only 9.7% of GWBs, representing 24.3% of GWB area, an increase from 8.8% in the previous plan. This low percentage might be explained by the abundant rainfall in large parts of the country, based on which it could be concluded that water scarcity is not a problem. Although nearly one quarter of GWB area is now monitored, expert judgment is used extensively in the status assessment based on supporting evidence (e.g. signs of saline intrusion or ecological impact).

Status assessment

Overexploitation of groundwater bodies is not a problem in Ireland. According to the data reported 99.6% of all GWBs are reported as being in good quantitative status, and only two GWBs (0.4%) as being in poor quantitative status. The same two are at risk of failing to achieve good quantitative status by 2027. In contrast, only one GWB was reported as being in poor quantitative status in 2015 (Figure 6). As regards GWB area, the third RBMP reports that 99.3% of the monitored area is in good quantitative status.

¹⁷ Common Implementation Strategy for the Water Framework Directive (2000/60/EC) Guidance Document No 37. Steps for defining and assessing ecological potential for improving comparability of heavily-modified water bodies.

Figure 6. Quantitative status of GWBs in the first, second and third RBMPs



Source: WISE electronic reporting

Confidence in the classification of quantitative status has decreased since the second RBMP: all GWBs are now reported to have no information/missing data for confidence (while the second RBMP reported high/medium confidence)¹⁸.



3.4 Protected areas - identification, monitoring, objectives and measures

Ireland has designated six types of protected area:

1. bathing waters under the Bathing Water Directive
2. drinking water protection areas
3. shellfish waters
4. Natura 2000 sites under the Birds and Habitats Directives
5. nutrient-sensitive areas under the Urban Wastewater Treatment Directive
6. freshwater-fish-designated areas.

Under the Nitrates Directive, Ireland has since 2003 applied an action programme with mandatory measures throughout the entire national territory (whole country approach) and is thus exempted from designating nitrate vulnerable zones under that Directive.

Monitoring sites have been established for SWBs and GWBs covering all the protected areas designated. Their number has increased in this cycle, except in GWBs in drinking water protection areas where the number of monitoring sites has decreased, which seems surprising.

Additional objectives have been applied to bathing waters, shellfish waters, drinking water protection areas, nutrient-sensitive areas, and Natura 2000 sites. Additional measures to ensure the achievement of those additional objectives have been applied to bathing waters, shellfish waters, nutrient-sensitive areas and Natura 2000 sites, but not to drinking water protection areas.

¹⁸ Ireland has since explained that this was a reporting error, but has not provided details, only stating that confidence was similar to that reported in the second RBMP.

Knowledge on the status of SWBs associated with protected areas has improved since the second RBMP – the percentage in unknown ecological status or potential has fallen from 17.8% in the second RBMP to 1.3% in the third RBMP.

Figure 7 shows the status of water bodies associated with protected areas in the second and third RBMPs. The increase in the percentage of SWBs associated with protected areas with a high or good ecological status from 50.9% in the second RBMP to 63.6% in the third RBMP is positive. However, the deterioration in the chemical status of SWBs associated with protected areas (from 15.2% with good status in the second RBMP to 4.3% with good status in the third RBMP) is concerning. It suggests that these areas do not benefit from better protection or that the measures applied are not effective.

The percentage of SWBs in unknown chemical status has increased from 83.5% in the second RBMP to 90.7% in the third RBMP.

In the third RBMP, all 514 delineated GWBs are classified as being in drinking water protected areas.

Their chemical status showed no significant improvement from the second to the third RBMP, with just over 90% with good status. The percentage in good quantitative status remained stable at 99.8%.

Figure 7. The status of water bodies associated with protected areas in the third RBMPs



Source: WISE electronic reporting



3.5 What is being done to prevent/reduce hydromorphological pressures

To tackle hydromorphological pressures, Ireland has reported measures under the following key types of measures (KTM):

- KTM 5 – ‘Improving longitudinal continuity’,
- KTM 6 – ‘Improving hydromorphological conditions of water bodies other than longitudinal continuity’,
- KTM 7 – ‘Improvements in flow regime and / or establishment of ecological flows’,
- KTM 14 – ‘Research activities’
- KTM 17 – ‘Measures to reduce sediment from soil erosion and surface runoff’, and
- KTM23 – ‘Natural water retention measures’.

Ireland has outlined commitments to develop a new, enhanced and consolidated legislative regime to address hydromorphological pressures and several actions are underway to implement permit revision regimes. It is also establishing a Hydromorphology Expert Group to support the National Hydromorphology Programme.

Specific measures have been implemented to target the 448 water bodies facing hydromorphological pressures. For example, the ‘Hymo 3’ measure in the RBMP aims to establish a national restoration programme, and the ‘Hymo 4’ measure aims to develop a sectoral action work plan for hydromorphology. Measures have also been introduced for site-specific actions. However, although timelines for addressing gap indicators are outlined, the third RBMP stops short of specifying quantitative reduction targets for hydromorphological pressures, with only ‘Hymo 3’ including a 10% target of barrier removal/modification by 2027.

Ireland does not identify drought or floods as a significant pressure, although several of the hydromorphological measures reference hydrological resilience.

E-flows have been derived and partially implemented, for some relevant water bodies only, and the work is still ongoing. Ireland applies a UKTAG-based methodology (2013) to assess environmental flow needs for surface waters.

The third RBMP incorporates nature-based solutions in many measures without explicitly using the term. For example, wetland creation and restoration, natural water retention measures, riparian buffer enhancement, and the removal or modification of artificial barriers are embedded throughout the programme of measures and are likely to contribute to reducing hydromorphological pressures. The RBMP’s measure named ‘Hymo 9’ is the only measure that directly mentions nature-based solutions, with reference to identifying restoration opportunities using catchment-based, nature-oriented approaches, and seeks to integrate WFD objectives with Ireland’s broader climate adaptation, flood risk management, and biodiversity strategies.



3.6 What Ireland is doing on abstractions and water scarcity

Water abstraction, defined as consumptive use or net consumption, is not a significant pressure at the level of river basin districts in Ireland. The third RBMP does not address seasonal water scarcity occurrences.

As of 2021, only two out of 514 GWBs were in poor quantitative status. One of those failed to achieve good quantitative status because the long-term annual average rate of abstraction exceeded the

available groundwater resource. In contrast, 28 out of 4 327 SWBs failed to achieve good ecological status due to water abstraction. Public water supply accounts for the failure in 27 of these SWBs, and agriculture for one. Indeed in Ireland, the total surface area under irrigation is less than 0.1% of the country's farmland.

Given that water abstraction is not recognised as a significant pressure at the RBD or national levels, Ireland is exempt from submitting data on the Water Exploitation Index+ (WEI+) or the WISE SoE on Water Quality under the WFD¹⁹.

The third RBMP and supplementary documents identify several categories of water users, including households, agriculture, industry, energy production, and aquaculture. Historical and projected sectoral water demand scenarios are absent from the third RBMP but are included in Ireland's National Water Resources Plan (NWRP).

The NWRP highlights that Ireland relies heavily on surface water sources (rivers and lakes) for public water supply, which contribute 83% of the national public water supply. It breaks this water use down further as: domestic consumption (32%); non-domestic consumption (23%); operational use (1%); apparent losses (1%); and leakage (43% in 2019, reduced to 38% by 2021). Growth is particularly anticipated in areas such as the Greater Dublin Area, Cork, Galway, and Limerick.

Statistics highlight the following major users²⁰: public water supply (71.7%), cooling for electricity production (25.5%), and agriculture, forestry, and fishing (2.8%), but the percentages do not take account of all users, e.g. data on use by manufacturing industry are missing.

Since 2016, total water abstraction has increased substantially, primarily due to a 65.3% rise in public water demand. Potential drivers include population and economic growth, improved metering, and transition from unregistered abstractions to regulated public supply.

The third RBMP highlights unauthorised abstractions as an outstanding issue, and the Water Environment (Abstractions and Associated Impoundments) Act 2022 establishes a comprehensive regime for abstraction registration, licensing, and enforcement.

Basic and supplementary measures have been outlined to address water abstraction, targeting areas where abstraction significantly impedes the achievement of good status. Basic controls include permitting regimes, abstraction and impoundment registers, and exemption thresholds for minor abstractions. Permits may be reviewed or revised to meet environmental objectives.

Ecological flows

Ecological flows (e-flows) are partially defined and implemented for selected water bodies, with ongoing work referenced in the third RBMP. A systematic link between e-flow implementation and the abstraction permitting process exists only where e-flows are defined and enforced. Authorities conduct checks post-authorisation to monitor compliance and prevent unauthorised abstractions²¹.

Measures to improve flow regimes, establish e-flows, and control water abstraction were executed during the second RBMP period, and further measures are planned for 2021-2027. However, the increase in water demand makes it clear that efforts to improve water efficiency in industry, energy, and households have yet to be implemented, despite the inclusion of supplementary measures such as pilot leakage reduction, smart metering, and public awareness campaigns in the third RBMP.

¹⁹ WISE-3: https://cdr.eionet.europa.eu/help/WISE_SoE/wise3

²⁰ https://ec.europa.eu/eurostat/databrowser/view/env_wat_abs_custom_8401102/default/table

²¹ Where e-flows are established and implemented, water abstraction licences have been revised to achieve environmental objectives and new applications for licences are assessed to mitigate deterioration of relevant water bodies and to achieve environmental objectives.



3.7 Adaptation to climate change

Ireland's climate policy alignment is evident in its third RBMP and NWRP, which refer to frameworks such as the 'Climate Action Plan 2023', the 'National Adaptation Framework', and key EU policies. Irish Water's statutory role ensures all water resource planning aligns with adaptation goals, particularly through operationalising risk identification and mainstreaming climate variables in monitoring.

Ireland's third RBMP integrates climate change adaptation throughout its programme of measures and governance framework. National adaptation actions are coordinated primarily at catchment level by regional entities like LAWPRO, referencing the government's 'Sectoral Adaptation Plan for Water' published in 2019. Key risks include rising temperatures, shifting precipitation patterns, more intense storms, and sea-level rise.

The third RBMP addresses these with measures such as:

- applying a 'climate check' to all activities using LAWPRO's assessment tools
- integrating the DHLGH's 'Climate Adaptation Plan' into planning processes
- improving monitoring systems to identify climate-vulnerable water bodies
- operating Geological Survey Ireland's groundwater network to track climate impacts
- rolling out actions (including plan updates, climate sensitivity assessments, and pilot projects) in its programme of measures
- following the NWRP, providing a 25-year roadmap for resilient water supply and conservation.

Ireland implements those measures through regional strategies, but it does not differentiate climate risks or adaptation actions by region. Actions are nationally framed but regionally executed, without explicit RBD-level distinctions.

Although no maladaptation measures are explicitly identified, the Natura Impact Statement notes that certain measures may inadvertently harm habitats. For example, water infrastructure upgrades could cause habitat loss or fragmentation unless properly designed. A risk management approach, requiring appropriate assessment at local levels, is established to mitigate these risks.

Drought management

Despite recent episodes of seasonal drought in Ireland, there is no dedicated, standalone drought management plan. However, the NWRP includes a comprehensive strategy within its broader resilience objectives. Drought responses are coordinated via escalation protocols (early warning / alert / action / crisis) linked to specific operational actions, involving both demand- and supply-side measures and real-time monitoring.

Significant droughts, notably in 2022, prompted Irish Water to implement conservation measures. The NWRP aims for a 1-in-50-year service standard for public water supplies, focusing on leakage reduction, source diversification, emergency capacity, and climate-adaptive infrastructure.

Ireland acknowledges the link between drought and declining water quality/ecological status; however, it lacks specific quantification or targeted mitigation actions. Appendix E of the NWRP provides a foundation for further ecological risk modelling and highlights ongoing research to improve understanding of flow thresholds and biological indicators.

Overall, the third RBMP and NWRP integrate climate adaptation across planning, monitoring, and infrastructure, but region-specific differentiation and detailed quantification of climate impacts remain areas for future development.



4. Policy elements contributing to zero pollution

4.1 Surface Water Bodies: what is their chemical status?

Monitoring

Since the second RBMP, Ireland has increased its monitoring network, with more emphasis on operational monitoring than surveillance monitoring. Operational monitoring now covers 75.8% of rivers (by length), and 88.3% of lakes (by area), 17.6% of coastal water bodies (by area), and 32.7% of transitional water bodies (also by area), the results of which are used to target known pressures.

The number of priority substances monitored varies between water body type, with 23 substances monitored in rivers and lakes (14 from the original list of 33 substances, and 9 from the 12 added in 2013) and 36 substances in transitional and coastal water bodies (25 from the original list of 33 substances, and 11 from the 12 added in 2013)²².

Monitoring frequency remains monthly (for a 12-month period once every 6 years), although the third RBMP also states that in some circumstances if the status of a surface water body is stable and unlikely to change due to the absence of any significant pressure the frequency of monitoring is reduced.

The third RBMP e-reporting shows biota monitoring for 13 out of the 20 substances identified in the Environmental Quality Standards Directive for long-term trend analysis. Ireland monitors biota at 70 sites, although the number of substances monitored at each site varies.

Status assessment – evolution of chemical status of SWBs since the second RBMP

A very high proportion (92.5%) of SWBs have not been assessed for chemical status, slightly higher than in the second RBMP.

3.7% (159 SWBs) of the total are in good chemical status and 3.8% (163 SWBs) not in good chemical status²³.

Comparison with the second RBMP shows a decrease in SWBs in good chemical status from 6.9% to 3.7% and an increase in SWBs in unknown status. Where the status assessment was conducted, it also demonstrates a deterioration in chemical status since the first RBMP.

Given the scale of the operational monitoring network, it is difficult to understand why the percentage of SWBs in unknown chemical status is so high. In the third RBMP, Ireland presents the chemical status of SWBs as if 52% are in good status (and 48% not) when ubiquitous priority substances (such as polyaromatic hydrocarbons and mercury) are included, and 91% in good status (9% not) when those pollutants are excluded. Yet it mentions that only 349 SWBs were assessed, without explaining why, although it does refer to the monitoring programme. In a separate document available online²⁴, Ireland explains how it extrapolates status assessments from monitored to unmonitored water bodies, but without addressing the chemical status of SWBs.

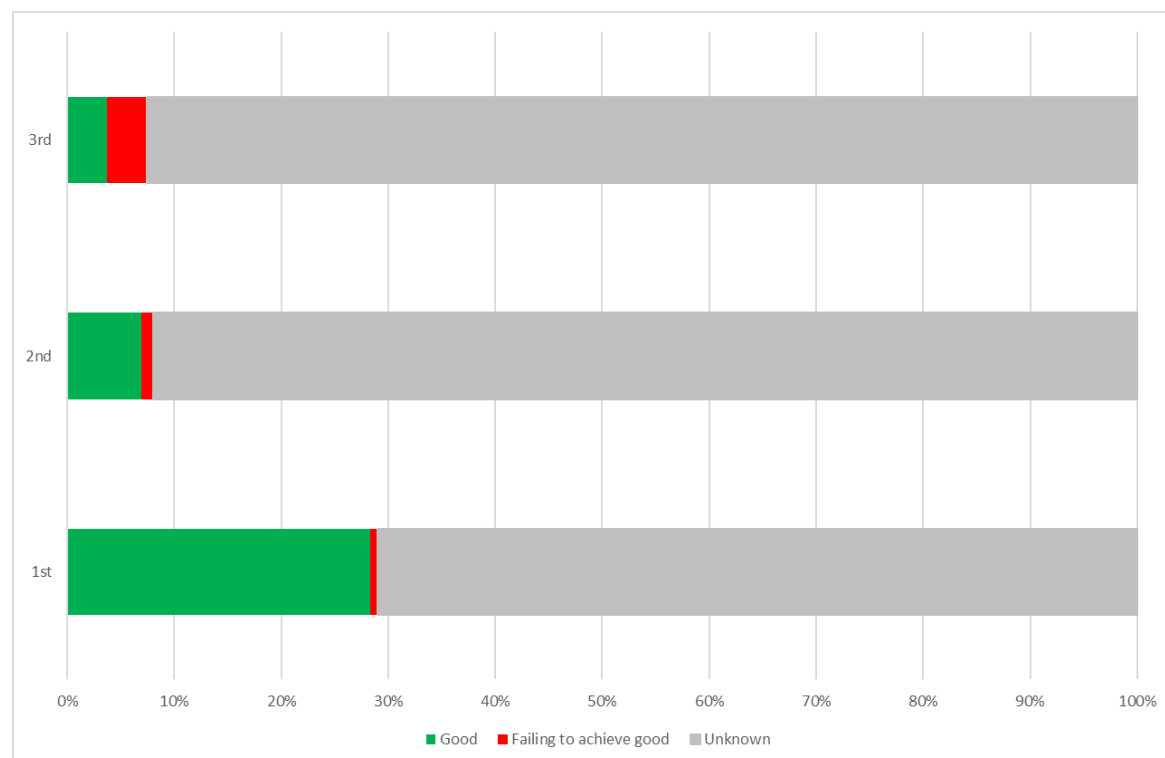
²² For surface water bodies, the substances not monitored in either rivers, lakes, coastal, or transitional waters include: Alachlor, short-chain chlorinated alkanes, chlorfenvinphos, chlorpyrifos, pentachlorobenzene, pentachlorophenol, trichloromethane, and trifluralin. Additionally, substances not monitored within inland waters (but monitored in coastal and transitional waters) include benzene, 1,2-dichloroethane, dichloromethane, di(2-ethylhexyl)phthalate, endosulfan, hexachlorocyclohexane, naphthalene, nonylphenols and octylphenols, tributyltin, trichlorobenzenes, quinoxifen, aclonifen, and dichlorvos. Dioxins and furans are monitored in inland waters (biota) but not in coastal or transitional waters.

²³ Ireland has since stated that chemical status assessments are ongoing.

²⁴ [Assigning WFD Status to Unmonitored Water Bodies in 2013-2018 | Environmental Protection Agency](#)

The non-uPBTs identified as causing failure of SWBs to achieve good status are cypermethrin and some heavy metals such as cadmium and lead.

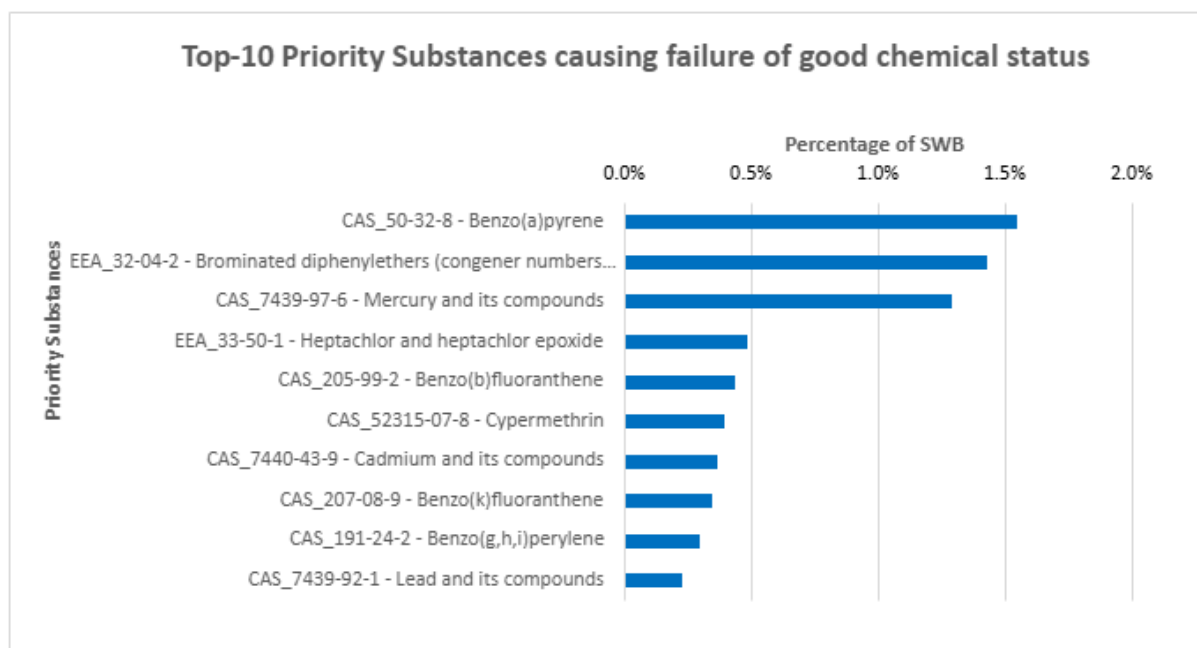
Figure 8. Chemical status of SWBs in Ireland in the first, second, and third RBMPs.



Source: WISE electronic reporting

In the few SWBs assessed, failure to achieve good chemical status is mainly due to three substances: benzo(a)pyrene, polybrominated diphenyl ethers, and mercury and its compounds; these substances are among those described as behaving like ubiquitous, persistent, bioaccumulative, and toxic (uPBT) substances.

Figure 9. The top 10 Priority Substances causing failure to achieve good chemical status in SWBs in Ireland.



Source: WISE electronic reporting



4.2 Groundwater Bodies: what is their chemical status?

Monitoring

Chemical monitoring was conducted in nearly 24% of GWBs and 50.3% of the total GWB area. This percentage did not change between the second and third RBMP periods. However, operational monitoring was conducted in only 42 out of 514 GWBs (8.2%) in the third RBMP period, down from at least 61 out of 513 GWBs (11.9%) in the second RBMP period. There were 81 operational monitoring sites for the third RBMP period, down from at least 106 previously reported²⁵. Monitoring sites have been decommissioned for GWBs assessed as not at risk of failing to meet WFD environmental objectives, according to the EPA report on the WFD monitoring programme 2019-2021²⁶.

Not all substances considered as posing a risk to the achievement of good chemical status were monitored for the third RBMP. According to the electronic reporting, some of the pollutants Member States would normally be expected to monitor or to at least consider monitoring were not reported as monitored in some or all RBDs²⁷. According to the third RBMP, some substances were not

²⁵ According to the European Commission's Implementation report for the second RBMPs (<https://circabc.europa.eu/ui/group/1c566741-ee2f-41e7-a915-7bd88bae7c03/library/53e6523b-c216-4d77-b884-30e1cb6725db/details?download=true>) the number of GWBs with operational monitoring included only two of the three RBDs in Ireland (Republic of Ireland RBD and Neagh Bann international RBD). Relevant data were not available in the second RBMPs e-reporting for the North Western international RBD.

²⁶ Ireland's National Water Framework Directive Monitoring Programme, 2019-2021, no longer available online, but available from catchments@epa.ie.

²⁷ Pesticides are not reported as monitored in any of the three RBDs. Moreover, trichloroethylene and tetrachloroethylene are not reported as monitored in two of the three RBDs (Neagh Bann RBD and Republic of Ireland RBD). Ireland has since

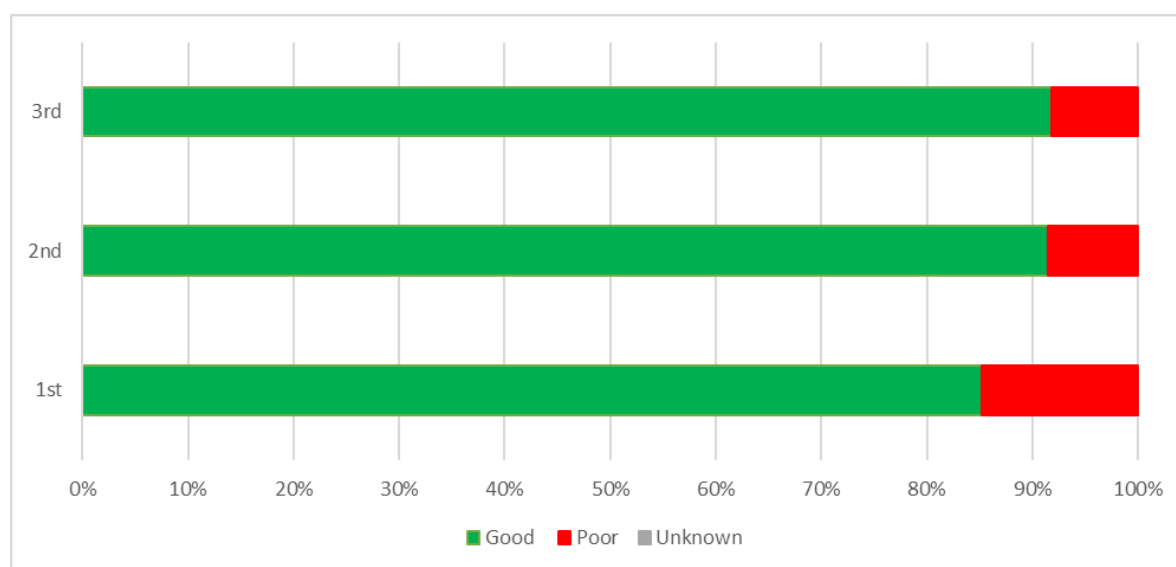
monitored across certain or all RBDs²⁸. However, nitrate, ammonium, pH, electrical conductivity, and dissolved oxygen were monitored in all RBDs.

Status assessment

According to the third RBMP, 472 of 514 GWBs (91.8%) were in good chemical status by 2021, while 42 GWBs (8.2%) were in poor chemical status. In comparison, 44 out of 513 GWBs (8.6%) were in poor chemical status in the second RBMPs by 2015. No GWBs are expected to fail to achieve good chemical status by 2027, yet 93 GWBs (18.1%) are at risk of not meeting this target.

Confidence in chemical status assessments has dropped significantly, which is concerning. High confidence fell from 62.8% in the second RBMPs to 8.2% in the third RBMP, and 91.8% of classifications lack a confidence assessment due to a reporting error²⁹.

Figure 10. Chemical status of GWBs in Ireland in the first, second, and third RBMPs.



Source: WISE electronic reporting

If GWB area is considered, 97.8% is classified as being in good chemical status, while 2.2% is in poor chemical status.

The main reasons for GWBs failing to achieve good chemical status are widespread pollution risks, impacts on surface waters, and harm to dependent terrestrial ecosystems. Multiple factors may affect the same GWB.

clarified that certain pesticides are monitored, but the data have not been submitted through e-reporting. Furthermore, if substances have not been identified as posing a risk to achieving good status for groundwater, they are not part of the routine monitoring programme but screened only once per cycle.

²⁸ According to the third RBMP documents, substances posing a risk of deterioration of chemical status were not included in monitoring in cases of highly localised sources of pollutants, which were assessed as unlikely to cause wider issues at the level of the GWB. Also, in some cases where pollution was suspected to originate from closed mines, direct monitoring was not feasible. Thus, assessments were conducted without monitoring data, but they were based on conceptual models and surrogate data.

²⁹ According to the third RBMP, the confidence is marked as 'unknown' when monitoring is insufficient to determine trends or confirm exceedances with adequate certainty. For example, trend assessments are not undertaken when a monitoring point has less than six years of data, because at least six years of data are required to determine a significant trend.



The top pollutants linked to failures to achieve good chemical status are ammonium, trichloroethylene, zinc, nitrate, and lead, with multiple pollutants sometimes affecting the same GWB.

4.3 What Ireland is doing to combat pollution from agriculture

Several measures were identified linked to:

- KTM2 (Reduction of nutrient pollution from agriculture);
- KTM3 (Reduction of pesticides pollution from agriculture);
- KTM12 (Advisory services for agriculture);
- KTM13 (Drinking water protection measures);
- KT16 (Upgrades and improvements of industrial wastewater treatment plants);
- KTM17 (Reduction of sediment from soil erosion and surface runoff).

The measures in the third RBMP include 12 key agriculture actions combining regulatory enforcement, voluntary incentives, tailored farm advice, and catchment-scale targeted measures. These include both basic and supplementary measures and implementing both mandatory legal frameworks like the Nitrates Directive and schemes funded under the CAP and European Innovation Partnerships.

All 86 measures from the second RBMP will continue under the third RBMP (unless they have already been fully implemented; Ireland has not specified how many of those have been fully implemented).

The fifth Nitrates Action Programme (2022-2025) builds on earlier actions, including tighter controls on nutrient management, and was scheduled for review in 2024 ahead of the development of a sixth Nitrates Action Programme.

Funding is expected to come primarily through the CAP strategic plan (2023-2027), which integrates several water-related schemes. The quality of water bodies will be improved through multiple interventions targeting around 32% of the agricultural area³⁰.

- Ireland's eco-scheme is estimated to allocate EUR 74 million to water protection.
- The ACRES cooperation and general schemes combined contribute another EUR 111.5 million.
- Ireland's Farming for Water European Innovation Partnership, with a dedicated EUR 60 million budget, is fully directed at water protection and restoration.
- The 'Agricultural Sustainability Support and Advisory Programme', co-funded by public authorities and the dairy industry, has a EUR 15 million budget.

Gap analysis for nutrient pollution has been carried out, including three types of gaps. For agricultural pollution, the gap analysis includes scenarios assuming 10% to 40% effectiveness of the agricultural measures. These forecast improvement in 17% to 56% (174 to 573) of waterbodies with significant agricultural pressures.

Ireland has not included nutrient management in its transboundary cooperation with Northern Ireland. Instead, Ireland's coordination efforts for nutrient reduction are largely directed towards coastal and transitional waters under international marine obligations, integrating the objectives of the Water Framework Directive with those of the Marine Strategy Framework Directive and the National Marine Planning Framework, rather than towards transboundary water bodies.

³⁰ [Mapping and analysis of CAP strategic plans - Publications Office of the EU](#)



4.4 What Ireland is doing to combat pollution from other sectors

The third RBMP also includes measures to tackle pollution from non-agricultural sources such as urban wastewater treatment plants, manufacturing industry, urban areas, forestry, transport, aquaculture and energy production.

Measures in the third RBMP that could have an impact on point-source pollution include measures under:

- KTM1 (Construction or upgrades of wastewater treatment plants);
- KTM4 (Remediation of contaminated sites);
- KTM14 (Research and improvement of knowledge base)),
- KTM15 (Phasing out / Reduction of emissions, discharges and losses of priority hazardous substances / priority substances);
- KTM16 (Upgrades and improvements of industrial wastewater treatment plants);
- KTM17 (Reduction of sediment from soil erosion and surface runoff);
- KTM18 (Prevention or control of adverse impacts of invasive alien species and introduced diseases);
- KTM20 (Prevention or control of adverse impacts of fishing and other exploitation/removal of animals and plants);
- KTM21 (Prevention or control of the input of pollution from urban areas, transport and built infrastructure).

Two such measures specifically outlined in the third RBMP are urban wastewater management measures (such as reviewing the current legislation and upgrading infrastructure) and domestic wastewater measures (such as engaging with households who require septic tank maintenance, and reviewing the National Inspection Plan for the period 2022-2027).

Other specific measures to tackle chemical pollutants include 'HazChem 1- review of EQS Regulations and RBSP review', 'HazChem 2- Engagement in EU revision of Priority Substances' and 'HazChem 3- Targeted Measures for Toxic Substances in High-Risk Areas'. These measures have been assigned to the relevant competent authority for implementation.

Apart from this, measures 'UWW 8', 'UWW 9', 'UWW 10' and 'UWW 11', and 'Domestic WW 2' and 'Domestic WW 6' are also likely to reduce chemical pollution from point sources.

In the context of the European Union's Recovery and Resilience Facility, the Irish National Recovery and Resilience Plan³¹ includes investment in a project aimed at delivering 10 priority waste water treatment plant projects where discharges have been identified as exerting significant pressure on receiving water bodies. The project also includes feasibility studies for a further 20 waste water treatment plant projects to expedite their subsequent delivery by Irish Water.



4.5 What Ireland is doing to combat significant pressures – overall assessment of the Programmes of Measures

In total, 123 measures are listed in the electronic report: 63 basic measures and 60 supplementary measures.

³¹ [the-national-resilience-and-recovery-plan-2021.pdf](#) – see Priority Component 1, Project 1.7

Ireland has partially carried out a cost-effectiveness analysis, although some measures have yet to go through the process because they have only just been implemented, and their cost and effectiveness is uncertain. The Irish authority did state that the cost-effectiveness analysis was more straightforward for water services, and that urban wastewater treatment is one of the most significant areas of expenditure. It also flagged that new voluntary measures are usually implemented following the principle of 'right measure in the right place' based on scientific and technical evidence of environmental risks.

In terms of prioritisation of measures, Ireland has identified 517 'Priority Areas for Action', and 2 181 waterbodies have been selected for focused attention.

The cost of supplementary measures is around EUR 716.5 million although a split between EU funds and national funding is not reported. In the third RBMP, a breakdown of the total costs of measures, alongside the responsible authorities, is provided. However, the costs and sources of funding for basic measures are not clarified.

Measures identified to tackle other significant pressures include several relating to invasive species, i.e. Invasive 1 to Invasive 6: on the implementation of the EU Invasive Alien Species Regulation, the implementation of existing management plans, the publication of a sectoral work plan, and actions covering recruitment, grants and public consultation. They also include measures relating to aquaculture, i.e. Aqua 1 to Aqua 5 on reviewing aquaculture consents, improving links with the WFD, providing online access to information on licences, consideration of legislative amendments and completion of the national strategic plan on sustainable aquaculture.

Regarding coordination with other Directives, Ireland has interlinked its MSFD implementation with several other areas including agriculture (Nitrates Action Programme, CAP Strategic Plan, Rural Development Programme and Green Low-Carbon Agri-Environment Scheme, pesticide control in the programme of measures for the MSFD); urban wastewater; urban runoff pressures; invasive alien species; and aquaculture. Implementation of the Floods Directive is linked with the national catchment flood risk assessment and management programme.

Unknown anthropogenic pressures (pressure type group: P8) affect 10%³² of SWBs and 5% of GWBs. KTM14 (Research, improvement of knowledge base reducing uncertainty) has been mapped to that pressure.

Agricultural pollution from diffuse sources (pressure type group: P2) was the most commonly-identified significant pressure. To address it, several KTMs have been applied for SWBs and GWBs, including:

- KTM12 - Advisory services for agriculture
- KTM17 - Measures to reduce sediment from soil erosion and surface runoff
- KTM2 - Reduce nutrient pollution from agriculture
- KTM3 - Reduce pesticides pollution from agriculture
- KTM13 - Drinking water protection measures (e.g. establishment of safeguard zones, buffer zones etc.

³² In the electronic data, 60% of SWBs are reported to be affected by unknown anthropogenic pressures, but Ireland has since explained that the electronic data are not correct and that approximately 10% of SWBs are affected by unknown anthropogenic pressures.

Gap indicators have been provided for each KTM linked to the pressures.

Ireland has planned relevant measures to tackle significant pressures and specific chemical substances, and provided gap indicators. However, Ireland did not report in detail on the progress made since the previous RBMP regarding implementation of the measures.

5. Exemptions and economics

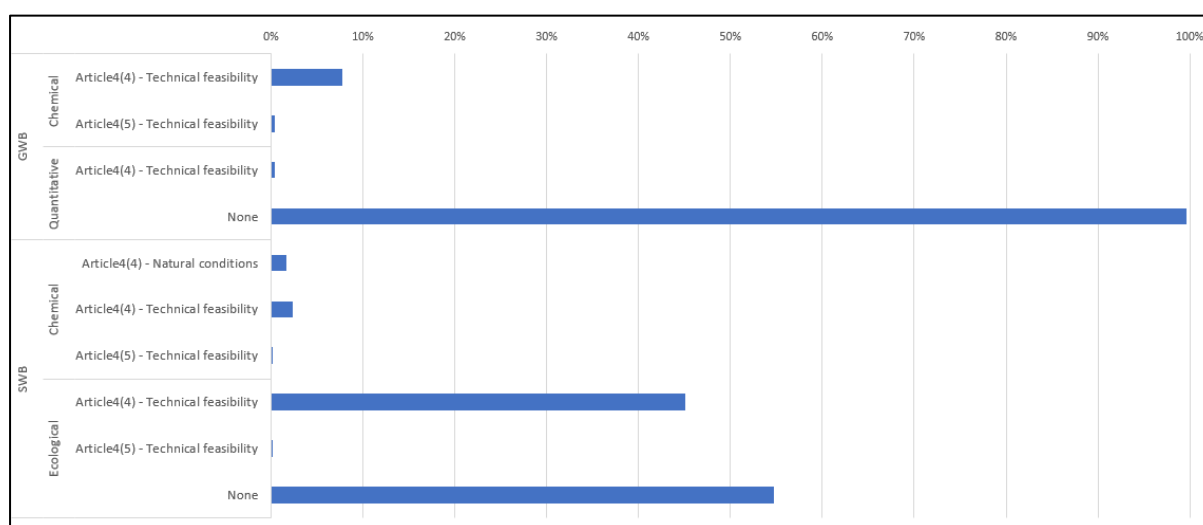


5.1 To what extent are exemptions applied in Ireland?

As the good status objectives have not been achieved in all water bodies, Ireland reported the application of a significant number of exemptions under the WFD in the third RBMP on the grounds that more time is needed to achieve the objectives (Article 4(4)) or that it is not feasible or disproportionately costly to achieve the objectives (Article 4(5)). It did not invoke any exemptions on the basis of *force majeure* (Article 4(6)) or to allow deterioration for modifications or activities of overriding public interest (Article 4(7)). It did not report any exemptions from the objective of preventing or limiting inputs of pollutants into groundwater (Article 6(3) of the Groundwater Directive (GWD)) in the second or third RBMPs.

Figure 11 shows the use of exemptions under Article 4(4) and 4(5) in Ireland, based on electronic reporting.

Figure 11. The use of exemptions according to Art. 4(4) and 4(5) WFD in SWBs and GWBs in Ireland. The figure shows the proportion of water bodies subject to each type of exemption.



Source: WISE electronic reporting

Exemptions are applied much more for ecological status than for chemical status.

The third RBMP reports that Article 4(4) exemptions have been applied in relation to two GWBs (0.4%) for quantitative status and 40 GWBs (7.8%) for chemical status on the grounds of technical infeasibility. Furthermore, Article 4(4) exemptions have been applied to 1 953 SWBs (45.1%) for ecological status / potential and to 104 SWBs (2.4%) for chemical status on the grounds of technical infeasibility. Article 4(4) exemptions have been applied to 71 SWBs (1.6%) for chemical status due to natural conditions. The number of Article 4(4) exemptions for SWBs has increased, but that for GWBs has decreased compared with the second RBMPs.

In the third RBMP, Article 4(5) exemptions have been applied to 7 SWBs (0.16%) for ecological status / potential, and two SWBs (0.05%) for chemical status, as well as to two GWBs (0.4%) for chemical status, in all cases on the grounds of infeasibility. In the second RBMP, Article 4(5) exemptions were used for 6 SWBs and 5 GWBs on the grounds of infeasibility. The third RBMP reports Article 4(4) and (5) exemptions but provides limited justification for their application to individual water bodies.

Information reported includes information on the type of exemption applied for each water body (e.g. Article 4(4), 4(5)) and grounds for the exemption (e.g. infeasibility) but does not include a specific justification for each water body. The third RBMP states that more detailed justifications and site-specific information will be provided in the future through linked resources like the [Catchments.ie](https://catchments.ie) portal and the 46 Catchment Management Work Plans. Furthermore, it is important to highlight that under Action 3.1 of the third RBMP, the DHLGH would commission the development and implementation of a methodology for the screening and application of Article 4(5) exemptions by the end of 2025.

In addition, the third RBMP states that the DHLGH has developed draft guidance to assess proposed new developments for the application of Article 4(7) exemptions. However, this guidance does not appear to be publicly available.



5.2 Use of economic analysis and water pricing – cost recovery

Ireland identifies two core water services: (i) (drinking) water supply and (ii) wastewater treatment, which for now also subsumes trade effluent services. Other uses such as abstractions, impoundments, and water storage are not explicitly defined as standalone water services in the RBMP but appear to be included within broader categories such as the broad water service public water supply or hydropower-related water use(s). The third RBMP does not confirm whether all listed water uses are included in the economic analysis.

The third RBMP's reporting on the economic analysis is incomplete and lacks detail. It sets out an approach to cost recovery, the use of economic instruments and the contribution of different water uses to the recovery of the costs of water services in a largely qualitative way. Furthermore, only some of the economic analysis items outlined in Annex III to the Water Framework Directive are described, and those only in general terms. Other key components are missing, namely (i) long-term water supply and demand forecasts (though those are referenced in the NWRP) and how those forecasts have informed the economic analysis; (ii) a differentiation of the mentioned overall investment expenditure (budget), and (iii) the application of cost-effectiveness analysis to inform the selection of measures.

Developments in economic analysis of water use since the second RBMP are described without comparing them with previous studies, making progress difficult to assess.

The third RBMP also lacks reporting on the application of Article 9 of the WFD³³ in general, or the use of economic instruments (including pricing) in particular. It does not provide a comprehensive

³³ Article 9(1) of the WFD requires Member States to set out water-pricing policies to provide adequate incentives for users to use water resources efficiently. It allows Member States to take account of the social, environmental and economic effects of the cost recovery and the geographic and climatic conditions of the region or regions affected. Article 9(2) requires Member States to report on their plans for implementing Article 9(1). The Commission took Ireland to court for failing to correctly transpose several provisions of the WFD, including the definition of water services in Article 2(38) and the reporting requirements in Article 9(2) (CJEU Case 204/24), and the grievances were upheld.

overview of the main features of the water tariff structure, nor does it refer to the actual tariffs published by the regulator (the Commission for Regulation of Utilities, CRU) and the water utility Uisce Éireann. Notably, Ireland does not have a tariff for domestic users' 'normal' water use. An 'excessive use charge' is proposed³⁴ when the annual household consumption exceeds 1.7 times the national average, but this is capped to a maximum of EUR 250, and has not yet been implemented. In addition, the unit rate of water tariffs charged to non-domestic users fall over consecutive consumption volume brackets.

The RBMP does explain whether the water prices provide 'adequate incentives' for more efficient water use, but the information above suggests that the set of regulated water prices only provides limited incentives for more efficient water use by non-domestic water users and only very limited incentives to domestic customers.

When queried on this gap in the RBMP, the Irish authorities referred to the recently established National Water Conservation Working Group, which can take measures in times of water scarcity, as well as to other policy documents (the National and Regional Water Resource Plans and CRU's tariff reviews for the non-domestic sector). However, this rather confirms that the RBMP itself fails to consider all policy measures in relation to one another and fails to demonstrate that its policy choice does not prevent Ireland from meeting the WFD environmental objectives and that it is cost-effective.

The third RBMP reports neither financial cost recovery rates nor historical cost and revenue data broken down by key water-user sectors. The RBMP explains that the regulator 'CRU' uses a 'full allocated cost' (FAC) methodology, which aims to proportionally assign the operational and capital costs to different customer classes and determines corresponding cost increases, using key drivers such as volume, pollutant load, and infrastructure requirements. This is said to have informed the tariffs applied to the non-domestic sector and the payment from the general government budget to cover the costs not covered by the tariff revenues.

According to that model, non-domestic customers are expected to contribute 24% of the total allowed revenue, and the lack of cost recovery implies a state budgetary contribution of well over EUR 1 billion. The information provided is not enough to infer whether there is full cost recovery from the non-domestic sector, or whether it cross-subsidises a part of the costs attributed to the domestic sector (households) or pays a tariff somewhat below a cost-covering level.

The RBMP does not discuss which mitigation factors justify the less than full cost recovery, nor does it explore the evolution of cost recovery in the next programming cycle, or how this relates to policy choices as regards water pricing and the investment and finance planning over the longer term.

The third RBMP affirms Ireland's commitment to the 'polluter pays principle' but without reference to estimations of environmental and resource costs. The third RBMP points to tariff components related to pollution pressures, specifically for non-domestic trade effluent, designed to attribute pollution to uses/services, but it does not demonstrate that actual polluters are being charged in proportion to the environmental damage they cause.

The third RBMP therefore fails to explain whether the various water user sectors contribute enough to cover the costs of water services.

³⁴ Uisce Éireann's Water Charges Plan Scheme indicates that the national Water Services Act allows for such a charge, but that the Minister has not issued the relevant rules for its implementation.



6. WFD recommendations

Ireland should:

1. Comply with the WFD timetable when developing, consulting on, adopting and reporting the next RBMP, and continue to strengthen and support effective water governance to ensure local community engagement and coordination across relevant authorities.
2. Reduce the compliance gap as much as possible before the next planning period. This entails significantly reducing the use of exemptions under Article 4(4), particularly for SWB ecological status/potential. Where exemptions are still needed, Ireland should:
 - a. provide detailed information on the application of Article 4(4) and 4(5) exemptions, including in particular detailed justification at water body level;
 - b. finalise and make publicly available the methodology for the screening and application of exemptions under Article 4(5) and 4(7).
3. Undertake comprehensive investment planning for the 4th RBMP and beyond, informed by long-term forecasts for both water demand and supply, consistent with climate change scenarios, and by robust economic evaluation, including analysis of the cost-effectiveness of measures and the scope for securing funding.
4. Ensure the application of the WFD's cost recovery requirements for water services, including by providing:
 - a. a transparent account of financial cost recovery rates and the justification of the grounds invoked for less than full cost recovery;
 - b. a transparent overview of the water tariff system as well as an assessment as to whether the pricing policies in place provide adequate incentives for efficient water use;
 - c. an assessment of the actual contributions of the various water use sectors, including an estimation of the major environmental and resource costs, in order to demonstrate whether the 'polluter pays principle' is adhered to, and more generally, whether these sectoral contributions can be considered adequate.

If the policy is to largely forego the use of economic instruments, Ireland should justify how this policy choice will not prevent it from meeting the WFD environmental objectives.
5. Identify and put in place all basic measures and necessary supplementary measures to reduce existing persistent environmental challenges (pressures) preventing the achievement of good status as those pressures will be aggravated by climate change.

This means, among other things:

- a. working with farmers to ensure more sustainable management of nutrients to avoid the need for further derogations under the Nitrates Directive;
 - b. ensuring implementation of a leakage reduction programme;
 - c. implementing measures to reduce chemical pollution and to remediate contaminated sites where necessary.
6. Close knowledge gaps by extending the monitoring programme where necessary to include more parameters/sites. This means taking immediate actions to:

- a. strengthen the monitoring of the ecological status of surface waters by covering all relevant quality elements in all water body categories including hydromorphological quality elements and physico-chemical quality elements;
 - b. ensure that monitoring frequencies for parameters used for ecological status assessment meet the minimum required frequencies set out in Annex V to the WFD;
 - c. develop the chemical pollutant monitoring programme for surface waters to address the very high proportion of surface water bodies in unknown chemical status, and to include all relevant river-basin-specific pollutants (requiring also the establishment of EQS where necessary);
 - d. ensure that all relevant substances, including all substances in GWD Annex I (including pesticides contributing to the total pesticide load) and relevant substances in Annex II (Part B) of the GWD and other substances identified as posing a risk are monitored in groundwater (requiring also the establishment of threshold values where necessary);
 - e. use surveillance monitoring programmes to support long-term trend assessment and ensure that trend monitoring in biota or sediment is conducted for all the substances identified for trend monitoring in the Environmental Quality Standards Directive.
7. Improve data quality, comparability, availability and access, by harmonising formats for electronically collected data between river basin districts and marine regions and by making all data publicly available through timely publication in line with the requirements of the Open Data Directive and the INSPIRE Directive.

This includes:

- a. further developing the methods to assess the status of SWBs and GWBs;
 - b. improving the level of confidence in the classification of groundwater quantitative and chemical status;
 - c. continuing the efforts to establish type-specific reference conditions for hydromorphological and physico-chemical quality elements for river and lake types and to establish type-specific conditions for hydromorphological quality elements for the remaining 25% of coastal types.
8. Improve the targeting of measures by:
- a. ensuring that the emissions inventory includes all the substances identified to be relevant at RBD-scale;
 - b. identifying the unknown anthropogenic pressures affecting SWBs, and thresholds for the significance of pressures on SWBs, and linking these with failure to achieve status objectives;
 - c. better assessing the achieved and expected effects of the measures introduced in previous planning periods;
 - d. identifying the need for additional measures to address pollution (diffuse and point source) from all relevant sectors in the RBD;
 - e. assessing how the planned measures will close the gaps to good status, including as regards nutrient and pesticide loads from agriculture.

When designing and implementing research-related measures, Ireland should make better and more systematic use of results from EU-funded research and innovation projects. This research can support better action on water management, e.g. to address water demand in the context of climate change as well as pollution from substances such as pesticides, pharmaceuticals, PFAS and microplastics.

9. Complete the definition and implementation of e-flows, establishing for all relevant water bodies an explicit link between the implementation of e-flows and the authorisation process and/or review of permits to control water abstractions and impoundments.
10. Introduce a clear definition of drought and water scarcity into the RBMP, aligned with EU guidance, and develop a drought management plan (or sub-plan), taking into account consumption predictions and climate change projections as well as cross-border cooperation needs.

7. Abbreviations and acronyms

AWB	Artificial water body
DHLGH	Department for Housing, Local Government and Heritage [of Ireland]
EEA	European Environment Agency
EIONET	European Environment Information and Observation Network
EPA	Environmental Protection Agency [of Ireland]
EQS	Environmental quality standard
GWAAE	Groundwater-associated aquatic ecosystem
GWB	Groundwater body
GWDTE	Groundwater-dependent terrestrial ecosystem
HMWB	Heavily-modified water body
KTM	Key type measures
LAWPRO	Local authorities' water programme [of Ireland]
MSFD	Marine Strategy Framework Directive
NWRP	National Water Resources Plan
RBD	River basin district
RBMP	River basin management plan
RBSP	River-basin-specific pollutant
SWB	Surface water body
uPBT	Ubiquitous, persistent, bioaccumulative and toxic substances
WFD	Water Framework Directive
WISE	Water Information System for Europe

SECTION B:

FLOODS DIRECTIVE

Ireland submitted information on its updated Flood Hazard and Risk Maps and a 2021 Review of its Flood Risk Management Plan in time for the Commission's assessment to accompany the Commission's main report published in February 2025.

See [EUR-Lex - 52025SC0031 - EN - EUR-Lex](#)