

From: [REDACTED]
To: [Development Plan](#)
Subject: Submission to Variation No.1 to the Clare County Development Plan 2023-2029"
Date: Tuesday 7 April 2026 11:58: [REDACTED]
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A Chara,

I wish to make the attached submission.

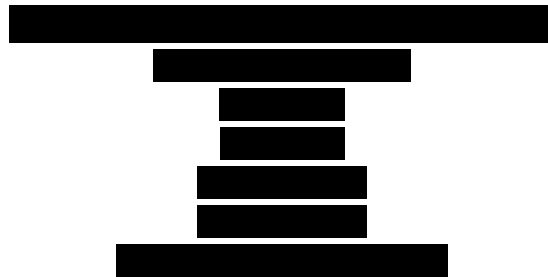
Regards,

Michael Duffy

**Submission on public participation element of the Clare County
Development Plan 2023-2029 review**

By Agent

Michael J. Duffy. CEng. MIEI



6th April 2026

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1. Introduction:

Regard to public participation submissions has traditionally been treated as light touch. However, it is important that the elected members consider what is being said in this submission and recognise their duties in respect of the process. Proper planning and sustainable development does not happen in a vacuum. If the ESB declared categorically that it would not be able to provide an electrical supply to a particular townland, agglomeration or area before 2030, or whenever, then that location would not be considered for residential zoning by this County Council and could not be considered by virtue of the National Planning Framework Objective 103. It will be seen herein that UE has openly stated that issues with the main wwtp and network in Ennis (Ennis North) will not be addressed until 2037.

National Policy Objective 103

When considering zoning land for development purposes that cannot be serviced within the life of the relevant plan, such lands should not be zoned for development.

For way too many years County Development Plans have paid lip-service to the provision of wastewater treatment infrastructure. By definition this infrastructure is located in remote locations away from the eyes of the public. It is no accident that serious pollution events are first recognised invariably by anglers. The ordinary Joe or Josephine do not normally pass where discharges from wwtp's, stormwater overflows, or emergency overflows from networks enter waters. The day of brushing these issues under the carpet are gone. The use of elastic language buried deep in the SEA or Appropriate Assessment won't cut the mustard anymore.

Neither will passing the buck to Uisce Eireann. While it may now have the statutory responsibility for water services, a point which this Local Authority is at pains to point out when a need for infrastructure is so blatant that it must be commented on, the skeletons and knowledge of the actual condition of the "assets" in place is still very much in-house in CCC.

The light touch "regard" is founded in s.58(8) (c) that written submissions with respect to the proposed variation and any strategic environmental assessment or appropriate assessment of the proposed variation made to the planning authority within the period referred to in paragraph (b) will be taken into consideration before the making of the variation.

2. Hierarchy of NPF in CDP Review Process:

This whole space was well ventilated in recent times in the High Court Judgement in *Coolglass v An Bord Pleanala* [2025] IEHC 1 as subsequently upheld in the Supreme Court Appeal [2026] IESC 5.

In the former at paragraph 64 the Court explains the hierarchy of “regard”.

64. The basic fault line is between regard and compliance, but there are shades of emphasis within that.

I can attempt to sketch the spectrum as follows:

- (i) *Simple have-regard obligations – the decision-maker has to take the matter into account but is free to depart from it. The weight to be attached to the matter is in principle for the decision-maker. This can also be phrased as requirement to consider something. An example from the 2000 Act, s. 18(3)(a):*

“(3) (a) When considering an application for permission under section 34, a planning authority, or the Board on appeal, shall have regard to the provisions of any local area plan prepared for the area to which the application relates, and the authority or the Board may also consider any relevant draft local plan which has been prepared but not yet made in accordance with section 20.”

- (ii) *Intensified have-regard obligations – the decision-maker is directed to have due or adequate or reasonable or appropriate regard to something. The weight to be given to the matter is now no longer totally discretionary. That implies something more than merely considering it and implies that the matter be given a degree of weight – not binding weight of course but material weight. It would normally mean an intensified duty of giving reasons – so that it would be clear why the decision-maker came to a conclusion different to the one that would be suggested by having regard to that factor in the event of such a different conclusion. An example from the Water Environment (Abstractions and Associated Impoundments) Act 2022, s. 86(2):*

“(2) Without prejudice to the generality of subsection (1), or section 20 (2)(i), the Agency, in considering an application by Waterways Ireland under Part 5 for a licence stated in the application to be necessary for the management, operation or maintenance of navigable water or a canal or navigation thereon, shall have due regard to the functions conferred on Waterways Ireland under the Canals Act 1986 and the Act of 1990 and the need to protect navigation in navigable waters or canals.”

Or a definition from s. 2 of the Freedom of Information Act 1997:

“‘determined’ means determined by the Minister and, in relation to a form, means determined having had appropriate regard to the needs of requesters, and cognate words shall be construed accordingly”.

- (iii) Comply-with to a reasonableness standard obligations – only reasonable as opposed to total compliance is required. An example from the Schedule to the S.I. No. 79 of 1981 - Harbour Rates (Dublin Harbour) Order 1981:*

“2. Where ‘by arrangement’ is used in relation to any commodity mentioned in this Schedule the rates fixed in relation to that commodity shall be in reasonable conformity with the general standard of rates in the Schedule.”

- (iv) Comply-with insofar as relates to the achievement of objectives. Such an obligation leaves to the decision-maker the choice of detail of compliance but is mandatory as to the overall result to be achieved. A member state’s choice of transposing measures falls into this category. Article 288 TFEU provides inter alia:*

“A directive shall be binding, as to the result to be achieved, upon each Member State to which it is addressed, but shall leave to the national authorities the choice of form and methods.”

Section 10(1A) of the 2000 Act is in this category – compliance with the National Planning Framework (NPF) and Regional Spatial and Economic Strategy (RSES) is as to objectives only, not to every jot and tittle of those documents (Killegland Estates Ltd. v. Meath County Council [2022] IEHC 393 (Unreported, High Court, 1st July 2022) at para. 146) and indeed must also take account of the fact that provisions in the NPF for example may only require general compliance rather than being highly prescriptive – Killegland Estates Ltd v. Meath County Council [2023] IESC 39 (Unreported, Supreme Court, Hogan J., 21st December 2023) at para. 101. Section 10(1A) states:

“(1A) The written statement referred to in subsection (1) shall include a core strategy which shows that the development objectives in the development plan are consistent, as far as practicable, with national and regional development objectives set out in the National Planning Framework and the regional spatial and economic strategy and with specific planning policy requirements specified in guidelines under subsection (1) of section 28.”

- (v) *Comply-with as far as practicable or possible – the decision-maker is required to comply with the matter in question, unless it is not possible or practicable to do so (concepts that are linguistically separate but only infrequently different in practice). Practicable means capable of being put into practice, not merely doing what is reasonable.*

This is a very high standard only just falling short of unconditional compliance requirements. It applies only unless compliance is not feasible: Lord Goddard L.C.J. in Lee v. Nursery Furnishings Ltd [1945] 1 All ER 387, Budd J. in O’Donovan v. Attorney General [1961] I.R. 114. Practicability is more exacting than reasonableness: Gillen v. Commissioner of An Garda Síochána [2012] IESC 3, [2012] 1 I.R. 574 per O’Donnell J. at para. 5: it is a “demanding and somewhat unforgiving standard”. Practicability is objective and is not based on the subjective view of the actor concerned. An example from the Roads Act 1993, s. 18(6):

“(6) In the performance of its functions, the Authority shall comply as far as possible with any plan approved under subsection (2).”

- (vi) *Compliance subject only to specified exception – here there must be straight compliance unless an exception applies. If the exception doesn’t apply then there is not a further get-out clause of practicability or reasonableness. An example is s. 3 of the ECHR Act 2003:*

“3.—(1) Subject to any statutory provision (other than this Act) or rule of law, every organ of the State shall perform its functions in a manner compatible with the State's obligations under the Convention provisions.”

- (vii) *Unconditional comply-with obligations – these are straight obligations to comply with something with no exceptions envisaged. An example from the Local Government (Mayor of Limerick) and Miscellaneous Provisions Act 2024, s. 60(2):*

“(2) The panel may, if it considers it appropriate to do so, request the Mayor, the Príomh Chomhairleoir, the director general or any member to provide specified documentation or information within a period specified in writing by the panel and the person so requested shall comply with the request.”

Or s. 19(3) of the 2000 Act:

“(3) The Minister may provide in regulations that local area plans shall be prepared in respect of certain classes of areas or in certain circumstances and a planning authority shall comply with any such regulations.”

Nothing in life is simple and no sooner had the ink dried on the judgement when section 10 of the 2000 Act as amended was revoked only to be replaced with the 2024 Act with respect to County Development Plans. However, the concept of hierarchy still applies. While the compliance *“as far as practicable”* is dropped the new act sets out specific mandatory requirements.

2.1.PDA Act 2024, as commenced:

Content of development plan

43. (1) *A development plan shall set out—*

(a) an integrated overall strategy for the proper planning and sustainable development of the functional area to which the development plan relates,

(b) the strategies and statements prepared under sections 44 to 51,

(2) The integrated overall strategy for the proper planning and sustainable development of the area referred to in paragraph (a) of subsection (1) shall be set out in a written statement, with such accompanying maps or other diagrammatic or visual representations as the planning authority consider appropriate.

(3) The written statement referred to in subsection (2) shall form a clearly identifiable part of the development plan and shall include—

(a) a statement explaining how the following matters have been or, as appropriate, are being implemented in the development plan:

(i) national and regional development objectives, including in relation to population and housing, set out in the National Planning Framework and the regional spatial and economic strategy for the region within which the functional area to which the development plan relates is situated;

(d) a statement demonstrating the manner in which the plan coordinates land-use with existing and planned investment in necessary public infrastructure and services for the period to which the plan relates,

(8) Where a development plan as made or varied departs from any relevant guidance contained in National Planning Policy Guidance, the written statement referred to in subsection (2) shall include a statement of the reasons why, in the opinion of the planning authority—

(a) the departure is not detrimental to the proper planning and sustainable development of the area, and

(b) the departure is justified having regard to the proper planning and sustainable development of the area.

(9) The planning authority shall ensure that the strategies and statements referred to in paragraph (b) of subsection (1) are coordinated and consistent with one another and with the integrated overall strategy for the proper planning and sustainable development of the area and shall ensure that the development plan overall is internally consistent and coherent.

My Emphasis

The above is relevant by virtue of s. 58 which stipulates that a variation of a development plan is subject to subsection (8) of section 42. Therefore the new “as far as practicable” compliance with objectives of the NPF is covered in the statement required in s.43(2) & (3) above.

The elected members have a decision to make. They can play the game with the Minister and zone the land proposed ignoring the actual facts in respect to the non-existent or dysfunctional wastewater treatment systems in the County including ignoring the statutory compliance with **NPO 103** or they can report back to the Minister telling him that they need to de-zone lands in most of the settlements due to a lack of wastewater treatment capacity.

A fundamental question all elected members should be asking themselves is which method will best secure the timely investment required to comply with statutory requirements including European Directives. Its easy blame farmers for beach closures or fish-kills when the truth is often that Uisce Eireann is the guilty party.

3. Reason for Variation:

The variation is presented as an attempt to align with the NPF Implementation: Housing Growth Requirement' Guidelines and the Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities.

I note the proposed amendment No.1f is to remove zoning description for Strategic Residential Reserve and delete objective CDP 9.1 Local Area Plans to align with the National Planning Framework **NPO 100**. This is the only National Planning Framework objective referred to. Notably there is no mention to **NPO 103** which could have shortened the journey for everybody involved. The Minister and the Department are gas-lighting stakeholders. Its own policy precludes additional zoning, and in some cases any zoning, for residential development because of the dire state of municipal wastewater treatment.

Least anyone be misled, especially the elected members, any solutions claimed or being proposed as to developer provided infrastructure needs to be very carefully considered and is certainly not a solution to, or get out of gaol around, **NPO 103**. Firstly, nobody knows how this will play out and particularly Uisce Eireann willingness or ability to take responsibility for what developers will deposit on its doorstep. The County is littered with dysfunctional and polluting examples of past developer provided wastewater treatment systems and infamous "*management companies*", a term which is an oxymoron. Making UE responsible for a new cohort, when it can't manage what it already has, is a recipe for disaster.

4. UE Wastewater Treatment Capacity Register:

Section 54(5) (c) states that a planning authority shall take such measures as it considers appropriate to consult *inter alia* the providers of water services. We have not been told of any communication or consultations with Uisce Eireann regarding wastewater capacity of wastewater treatment plants or the associated networks. This is fundamental information to ensure compliance with NPO 103 and others.

I note references in the SEA to the UE “Capacity Register” and the use of this register to inform some zoning proposals. I also note that where there is an undisputed knowledge by all and sundry that either no wastewater treatment exists or that there is no capacity available that land is still proposed to be zoned.

At its simplest the Capacity Register has no material standing. Uisce Éireann clearly state the following in respect of the registers.

These registers cannot be taken as confirmation that capacity is available for a particular development and Uisce Éireann does not accept liability for the consequences of any person relying on this information. In all instances if you are considering progressing a development you should contact our Connection and Developer Services team who will provide an up-to-date view and greater level of detail in relation to the availability of capacity.

These registers provide supply or treatment capacity information only and do not provide an indication of network capacity. In cases where a new development is planned, we may need to make upgrades to the network. We assess whether the network can support a new development during the connections process.

The current wastewater register for Clare shows Clareabbey, Ennistymon, Tulla, Lahinch, Doonbeg, Kilkee, and Kilmihil at amber. The amber designation is defined as;

- *Amber = potential spare capacity, additional analysis of applications may be required on an individual basis considering their specific load requirements. Potential availability of capacity in this case would be dependent on any additional load not resulting in a significant breach of the combined approach as set out in Regulation 43 of the Wastewater Discharge (Authorisation) Regulations 2007, which is a matter for the relevant Planning Authorities to determine.*

Clareabbey was designated at red for the previous two years. No works have been carried out in the intervening time to add capacity. The licence is under review but Uisce Éireann has been dragging its feet in providing information to the EPA for a review. Site visit reports of the EPA declare the plant to be overloaded. CCC needs to ask UE on what basis is Clareabbey now designated to be at amber as opposed to red on the register.

Ennistymon is well recognised to have no available capacity. A recent planning decision 2560002 refusing permission on the basis of a lack of available capacity was upheld by An Coimisiún Pleanála ABP- 322152-25.

The AER for **Tulla** shows it is non-compliant on 3 ELV parameters. The upstream and downstream WFD status is poor. Public bodies are statutorily prohibited for increasing pollution and any additional zoning/development will increase pollution. Stormwater overflow is not monitored so the true loading on the plant cannot be properly determined. No upgrade works planned.

Lahinch has long since been recognised by the PA as having no capacity. The facts of the status of the Lahinch plant are available on the front page of the Clare Champion of 3rd April 2026 in which it reports that the EPA reported that the entire plant was flooded on 41 days last year.

Doonbeg wwtp is non-compliant with four ELV's. The plant loading is not determined on the basis of PE defined in the EU Directive. It is stated to have inadequate infrastructure and the stormwater overflow is unmonitored so the true loading on the plant is unknown. This SWO discharges to an SAC. There are no improvement works planned.

Kilkee has no wastewater treatment whatsoever. It discharges the entire untreated wastewater arising to the ocean. The proposed plant is only for primary treatment, is currently being judicially reviewed and may be unlicensable. In any event it will not be constructed in the lifetime of this development plan.

Kilmihil is only at planning stage and will not be commissioned in the lifetime of this plan. The existing plant is overloaded and in terrible condition as can be seen from the latest SVR.

Kildysert, Kilkishen and Miltown Malbay are at red with no capacity.

It is claimed that there is capacity in **Ennis North**. A series of AER's show the plant to constantly non-compliant with its Ammonia ELV discharging to an SAC River with Moderate WFD status. The WWTP discharge was not compliant with the ELV's set in the wastewater discharge licence for the following: Ammonia-Total (as N) mg/l. The ambient monitoring results do not meet the required EQS at the downstream monitoring location. The EQS relates to the Oxygenation and Nutrient Conditions set out in the Surface Water Regulations 2009. Based on ambient monitoring results a deterioration in Ammonia, BOD, BOD with inhibition, pH, Temperature, Total Nitrogen, Total Phosphorus., concentrations downstream of the effluent discharge is noted. A deterioration in water quality has been identified. It is declared that 485,892 m³ of untreated wastewater was discharged from one of an unknown number of stormwater/emergency overflows in the agglomeration in one year. There is no monitoring of other SWO's/EO's. Public bodies are statutorily prohibited for increasing pollution and any additional zoning/development will increase pollution in the SAC River and groundwater. The timeframe for completing works required in the discharge licence is given as 2037. A review of the licence was required by the EPA but UE is dragging its feet in making the application.

Corofin, Lisdoonvarna, Kilmurry Ibrickane, are the only plants in the County with capacity. All other plants either do not have capacity or have unmonitored SWO's/EO's which are polluting receiving waters contrary to Article 4 of the UWW treatment Directive. None of these are planned to be addressed within the lifetime of this plan. Therefore zoning of land for development in these settlements is contrary to NPO 103.

5. Liaison with UE:

The PA has a discretion to seek the opinion and assistance of the EPA in relation to the factual situation in respect of each settlement/agglomeration and seek its opinion on available capacities of wwtp's and the associated networks. Was this done, and if not, why not?

What communications were made with UE in respect of this variation? Did the PA look at the highly qualified UE capacity register and take that as the basis for the best scientific knowledge available. I have included in this submission a sample of the true conditions of some of these wwtp's. This is something which should have been fundamental to the SEA at the outset of this process. In that regard I believe the SEA is flawed and should not form the basis for recommendations in this variation.

UE need to be properly interrogated about every municipal wwtp in the County before any development zonings are considered.

6. Liaison with OPR/Minister:

Notwithstanding that the Minister initiated this variation to increase the area of zoned land for residential development both the OPR and the Minister need to be made fully aware of the lack of capacity to treat additional wastewater arising for additional zoning. The estoppel to additional development zoning in NPO 103 needs to be highlighted to both these parties.

7. Speed Limit Review:

There should be an immediate review of all speed limits in settlements especially where designated 60kph speed limits are impacting on applicants for planning permission in designated settlements such as, but not limited to Lissycasey.

Similarly there should be a reassessment of TII policy and the Minister's direction on a blanket ban on new entrances to national roads. This should be a matter for the professional judgement of Planners on a case by case basis.

8. Conclusions:

I submit that there can be no proposals to increase zoning for residential development in any settlement/agglomeration until such time as adequate wastewater treatment including compliant stormwater overflows or emergency overflows are provided. There are a very few locations where additional zoning can be made but they are few in number.

It is imperative in this process that the best scientific knowledge available in relation to the condition of all municipal wastewater treatment works are assessed before any proposals for additional development zoning is made. The review should consider de-zoning where it is found that capacity does not exist and will not be provided in the lifetime of this plan. This proposal should not be progressed until the elected members are properly informed and advised.

Michael Duffy

Electronic submission

9. Appendices:

Samples of reports from EPA Discharge Licence portals

Annual Environmental Report

2024



Doonbeg

D0324-01

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1 EXECUTIVE SUMMARY AND INTRODUCTION TO THE 2024 AER

This Annual Environmental Report has been prepared for D0324-01, Doonbeg, in Clare in accordance with the requirements of the wastewater discharge licence for the agglomeration. Specified reports where relevant are included as an appendix to the AER.

1.1 ANNUAL STATEMENT OF MEASURES

A summary of any improvements undertaken is provided where applicable.

There were no major capital or operational changes undertaken.

1.2 TREATMENT SUMMARY

The agglomeration is served by a wastewater treatment plant(s)

- Doonbeg WWTP with a Plant Capacity PE of 1500, the treatment type is 2 - Secondary treatment .

1.3 ELV OVERVIEW

The overall compliance of the final effluent with the Emission Limit Values (ELVs) is shown below. More detailed information on the below ELV's can be found in Section 2.

Discharge Point Reference	Treatment Plant	Discharge Type	Compliance Status	Parameters failing if relevant
TPEFF0300D0324SW001	Doonbeg WWTP	Treated	Non-Compliant	Ammonia-Total (as N) mg/l BOD, 5 days with Inhibition (Carbonaceous BOD) mg/l COD-Cr mg/l Suspended Solids mg/l

1.4 LICENCE SPECIFIC REPORTING

Assessment / Report

There are no Licence Specific Reports included in this AER.

2 TREATMENT PLANT PERFORMANCE AND IMPACT SUMMARY

2.1 DOONBEG WWTP - TREATED DISCHARGE

2.1.1 INFLUENT MONITORING SUMMARY - DOONBEG WWTP

A summary of influent monitoring for the treatment plant is presented below. This monitoring is primarily undertaken in order to determine the overall efficiency of the plant in removing pollutants from the raw wastewater.

Parameters	Number of Samples	Annual Max	Annual Mean
Total Nitrogen mg/l	7	47	27
BOD, 5 days with Inhibition (Carbonaceous BOD) mg/l	7	178	103
Total Phosphorus (as P) mg/l	7	6.30	3.51
COD-Cr mg/l	7	374	209
Hydraulic Capacity	N/A	440	280

If other inputs in the form of sludge / leachate are added to the WWTP then these are included in Section 2.1.5 if applicable.

Significance of Results:

The annual mean hydraulic loading is less than the peak Treatment Plant Capacity. The annual maximum hydraulic loading is less than the peak Treatment Plant Capacity. Further details on the plant capacity and efficiency can be found under the sectional 'Operational Performance Summary'. The design of the wastewater treatment plant allows for peak values and therefore the peak loads have not impacted on compliance with Emission Limit Values.

2.1.2 EFFLUENT MONITORING SUMMARY - TPEFF0300D0324SW001

Parameter	WWDL ELV (Schedule A)	ELV with Condition 2 Interpretation included Note 1	Interim % reduction from influent concentration	Number of sample results	Number of exceedances	Number of exceedances with Condition 2 Interpretation included	Annual Mean	Overall Compliance (Pass/Fail)
COD-Cr mg/l	125	250	N/A	7	4	N/A	121	Fail
Suspended Solids mg/l	35	87.5	N/A	7	4	N/A	33	Fail
BOD, 5 days with Inhibition (Carbonaceous BOD) mg/l	25	50	N/A	7	4	1	30	Fail
Total Oxidised Nitrogen (as N) mg/l	10	12	N/A	7	N/A	N/A	0.124	Pass
pH pH units	9	9	N/A	7	N/A	N/A	7.47	Pass
Ammonia-Total (as N) mg/l	5	6	N/A	7	7	7	21	Fail
Total Phosphorus (as P) mg/l	N/A	N/A	N/A	7	N/A	N/A	3.07	
Total Nitrogen mg/l	N/A	N/A	N/A	7	N/A	N/A	24	

Notes:

1 – This represents the Emission Limit Values after the Interpretation provided for under Condition 2 of the licence is applied

2 – For pH the WWDA specifies a range of pH 6 - 9

Cause of Exceedance(s):

Refer to Incident section of this report.

Significance of Results:

The WWTP is non compliant with the ELV's set in the Wastewater Discharge Licence. The impact on receiving waters is assessed further in Section 2.

2.1.3 AMBIENT MONITORING SUMMARY FOR THE TREATMENT PLANT DISCHARGE TPEFF0300D0324SW001

A summary of monitoring from ambient monitoring points associated with the wastewater discharge is provided in the sections below. For discharges to rivers upstream (U/S) and downstream (D/S) location data is provided. For other ambient points in lakes, coastal or transitional waters, monitoring data from the most appropriate monitoring station is selected.

The table below provides details of ambient monitoring locations and details of any designations as sensitive areas.

Ambient Monitoring Point from WWDL (or as agreed with EPA)	Irish Grid Reference	River Station Code	Bathing Water	Drinking Water	FWPM	Shellfish	WFD Ecological Status
Downstream	96703, 167432	CW03004136DG1001	No	No	No	No	Good

The results for ambient results and / or additional monitoring data sets are included in the **Appendix 7.1 - Ambient monitoring summary**

Significance of Results:

The WWTP discharge was not compliant with the ELV's set in the wastewater discharge licence.

The discharge from the wastewater treatment plant does not have an observable impact on the water quality.

The discharge from the wastewater treatment plant does not have an observable negative impact on the Water Framework Directive status.

2.1.4 OPERATIONAL PERFORMANCE SUMMARY - DOONBEG WWTP

2.1.4.1 Treatment Efficiency Report - Doonbeg WWTP

Treatment efficiency is based on the removal of key pollutants from the influent wastewater by the treatment plant. In essence the calculation is based on the balance of load coming into the plant versus the load leaving the plant. The efficiency is presented as a percentage removal rate.

A summary presentation of the efficiency of the treatment process including information for all the parameters specified in the licence is included below:

Parameter	Influent mass loading (kg/year)	Effluent mass emission (kg/year)	Efficiency (% reduction of influent load)
SS	N/A	3363	N/A
TP	362	313	14
cBOD	10638	3014	72
COD	21560	12380	43
TN	2811	2448	13

Note: The above data is based on sample results for the number of dates reported

2.1.4.2 Treatment Capacity Report Summary - Doonbeg WWTP

Treatment capacity is an assessment of the hydraulic (flow) and organic (the amount of pollutants) load a treatment plant is designed to treat versus the current loading of that plant.

Doonbeg WWTP	
Peak Hydraulic Capacity (m ³ /day) - As Constructed	864
DWF to the Treatment Plant (m ³ /day)	200
Current Hydraulic Loading - annual max (m ³ /day)	440

Doonbeg WWTP	
Average Hydraulic loading to the Treatment Plant (m ³ /day)	279.8
Organic Capacity (PE) - As Constructed	1500
Organic Capacity (PE) - Collected Load (peak week) ^{Note1}	1275
Organic Capacity (PE) - Remaining	225
Will the capacity be exceeded in the next three years? (Yes/No)	No

Nominal design capacities can be based on conservative design principles. In some cases assessment of existing plants has shown organic capacities significantly higher than the nominal design capacity. Accordingly plants that appear to be overloaded when comparing a collected peak load with the nominal design capacity can be fully compliant due to the safety factors in the original design.

2.1.5 SLUDGE / OTHER INPUTS - DOONBEG WWTP

'Other inputs' to the waste water treatment plant are summarised in table below

Input type	Quantity	Unit	P.E.	% of load to WWTP	Included in Influent Monitoring (Y/N)?	Is there a leachate/sludge acceptance procedure for the WWTP?	Is there a dedicated leachate/sludge acceptance facility for the WWTP? (Y/N)
There is no Sludge and Other Input data for the Treatment Plant included in the AER.							

3 COMPLAINTS AND INCIDENTS

3.1 COMPLAINTS SUMMARY

A summary of complaints of an environmental nature related to the discharge(s) to water from the WWTP and network is included below.

Number of Complaints	Nature of Complaint	Number Open Complaints	Number Closed Complaints
There were no relevant environmental complaints in 2024.			

3.2 REPORTED INCIDENTS SUMMARY

Environmental incidents that arise in an agglomeration are reported on an on-going basis in accordance with our waste water discharge licences. Where an incident occurs and it is reportable under the licence, it is reported to the Environmental Protection Agency through their Environmental Data Exchange Network, or in some instances by telephone. Some incidents which arise in the agglomeration are recorded by Uisce Éireann but may not be reportable under our licence for example where the incident does not have an impact on environmental performance.

A summary of reported incidents is included below.

3.2.1 SUMMARY OF INCIDENTS

Incident Type	Cause	Recurring (Y/N)	Closed (Y/N)
Abatement equipment off-line	Plant or equipment breakdown at WWTP	No	Yes
Monitoring Equipment offline	Plant or equipment breakdown at WWTP	No	Yes
Breach of ELV	Inadequate Infrastructure	Yes	No

3.2.2 SUMMARY OF OVERALL INCIDENTS

Question	Answer
Number of Incidents in 2024	3
Number of Incidents reported to the EPA via EDEN in 2024	3
Explanation of any discrepancies between the two numbers above	N/A

4 INFRASTRUCTURAL ASSESSMENTS AND PROGRAMME OF IMPROVEMENTS

4.1 STORM WATER OVERFLOW IDENTIFICATION AND INSPECTION REPORT

A summary of the operation of the storm water overflows and their significance where known is included below:

4.1.1 SWO IDENTIFICATION

WWDL Name / Code for Storm Water Overflow (chamber) where applicable	Irish Grid Ref. (outfall)	Included in Schedule of the WWDL	Significance of the overflow(High / Medium / Low)	Assessed against DoEHLG Criteria	No. of times activated in 2024 (No. of events)	Total volume discharged in 2024 (m3)	Monitoring Status
TBC	97144, 165526	Yes	Low Significance	Meeting Criteria	Unknown	Unknown	Not Monitored

The contents presented in this table include the most up to date information available at the time of writing. Any TBC SWO(s) were identified as part of the on-going National SWO programme and will be updated in subsequent AER(s) once the information is confirmed.

SWO Summary	
How much wastewater discharge by metered SWOs during the year (m3)?	Unknown
Is each SWO identified as not meeting DoEHLG Guidance included in the Programme of Improvements?	N/A
The SWO Assessment included the requirements of relevant of WWDL schedules?	Yes
Have the EPA been advised of any additional SWOs / changes to Schedule C3 and A4 under Condition 1.7?	N/A

4.2 REPORT ON PROGRESS MADE AND PROPOSALS BEING DEVELOPED TO MEET THE IMPROVEMENT PROGRAMME REQUIREMENTS.

4.2.1 SPECIFIED IMPROVEMENT PROGRAMME SUMMARY

A wastewater discharge licence may require a number of reports on specific subject areas to be prepared for the agglomeration in question. These reports are submitted to the EPA as part of the Annual Environmental Report. This section provides a list of the various reports required for this agglomeration and a brief summary of their recommendations.

Specified Improvement Programmes (under Schedule A and C of WWDL)	Description	Licence Schedule	Licence Completion Date	Date Expired? (N/NA/Y)	Status of Works	Timeframe for Completing the Work	Comments
D0324-SIP:01	Improvements, if required in accordance with Condition 5.2.4	C	31/12/2016	Yes	At Planning Stage		At stage 2 , marine model required

A summary of the status of any other improvements identified by under Condition 5 assessments- is included below.

4.2.2 IMPROVEMENT PROGRAMME SUMMARY

Improvement Identifier	Improvement Description / or any Operational Improvements	Improvement Source	Expected Completion Date	Comments
No additional improvements planned at this time.				

4.2.3 SEWER INTEGRITY RISK ASSESSMENT

The utilisation of multiple capital maintenance programmes and the outputs of the workshops with the Local Authority Operations Staff held under the programme can be used to satisfy the requirements of Condition 5 regarding network integrity. Improvement works identified by way of these programmes and workshops will be included in the Improvements Summary Tables 4.2.1 and 4.2.2.

5 LICENCE SPECIFIC REPORTS

A wastewater discharge licence may require a number of reports on specific subject areas to be prepared for the agglomeration in question. These reports are submitted to the EPA as part of the Annual Environmental Report. This section provides a list of the various reports required for this agglomeration and a brief summary of their recommendations.

Licence Specific Report	Required by licence	Included in this AER
There is no Licence Specific Report Required in this AER Annual Review.		

6 CERTIFICATION AND SIGN OFF

6.1 SUMMARY OF AER CONTENTS

Parameter	Answer
Does the AER include an Executive Summary?	Yes
Does the AER include an assessment of the performance of the Waste Water Works (i.e. have the results of assessments been interpreted against WWDL requirements and or Environmental Quality Standards)?	Yes
Is there a need to advise the EPA for Consideration of a Technical Amendment/Review of the Licence?	N/A
List reason e.g. additional SWO identified	N/A
Is there a need to request/advise the EPA of any modification to the existing WWDL with respect to condition 4 changes to monitoring location, frequency etc	N/A
List reason e.g. changes to monitoring requirements	N/A
Have these processes commenced?	N/A
Are all outstanding reports and assessments from previous AERs included as an appendix to this AER	No

I certify that the information given in this Annual Environmental Report is truthful, accurate and complete:

Signed: Date: 24/06/2025

This AER has been produced by Uisce Éireann's Environmental Information System (EIMS) and has been electronically signed off in that system for and on behalf of ,

Eleanor Roche

Head of Environmental Regulation.

7 APPENDIX

Appendix
Appendix 7.1 - Ambient monitoring summary

Ambient Points

Ambient Monitoring Point from WWDL (or as agreed with EPA)	Irish Grid Reference	EPA Feature Coding Tool code	Receiving Waters Designation (Y/N)				WFD Status
			Bathing Water	Drinking Water	FWPM	Shellfish	
CW03004136DG1001	96703, 167432	TPEFF0300D0324SW001	No	No	No	No	Good

Ambient Impact Assessment Table

Parameter Name	Downstream Monitoring Point Location	Downstream Monitoring Point Annual Mean	EQS (Mean)	%EQS
Ammonia (as N) mg/l	CW03004136DG1001	1.608		
BOD mg/l	CW03004136DG1001	0.500		
COD mg/l	CW03004136DG1001	77.000		
Dissolved Oxygen mg/l	CW03004136DG1001	10.023		
E. Coli no./100mls	CW03004136DG1001	12.500		
Faecal Coliforms no./100mls	CW03004136DG1001	12.500		
Intestinal enterococci no.100/mls	CW03004136DG1001	1.250		
pH pH units	CW03004136DG1001	8.275		
Suspended Solids mg/l	CW03004136DG1001	94.750		
Temperature °C	CW03004136DG1001	12.050		
Total Oxidised Nitrogen (as N) mg/l	CW03004136DG1001	0.050		

Ambient Data Tables

				Ammonia	BOD	COD	Dissolved Oxygen	E.coli	Faecal coliforms	Intestinal enterococci	pH	Suspended Solids	Temperature	Total Oxidised Nitrogen
Monitored Entity	Station	Monitoring Point	Sample Date	mg/l	mg/l	mg/l	mg/l	no./100mls	no./100mls	no./100mls	pH Units	mg/l	°C	mg/l
Doonbeg Bay	CW03004136DG1001	Downstream	24/05/2024	0.953	0.5	140	8.94	0	0	1	8.7	26	12.6	0.05
Doonbeg Bay	CW03004136DG1001	Downstream	08/02/2024		0.5	40	12.1	30	30	1	8.1	3	5.9	0.048
Doonbeg Bay	CW03004136DG1001	Downstream	21/08/2024	3.41	0.5	77	10.1	0	0	3	8.2	119	16.3	0.05
Doonbeg Bay	CW03004136DG1001	Downstream	01/11/2024	0.462	0.5	51	8.95	20	20	0	8.1	231	13.4	0.05
Mean				1.608	0.500	77.000	10.023	12.500	12.500	1.250	8.275	94.750	12.050	0.050

Note: Where the concentration in the result is less than the limit of detection (LOD), a value of LOD/sqrt(2) was used in calculating the mean and 95%ile concentrations.



Uisce Éireann - D0324

Waste Water Discharge Authorisation

[Authorisation Dashboard](#)

[Authorisation Versions](#)

[Compliance Records](#)

[< Back to Previous Record](#)



Action / Instruction: A126766

Reference No.	Status	Authorisation Version
A126766	Open	D0324-01

Action / Instruction Details

Date Submitted by the EPA	04/11/2025
Subject	Ultraviolet disinfection system not in use
Sender	EPA
Category	Request for Information
Licensee Response Due Date	31/03/2026
Type	Action
Recipient	Licensee

Action / Instruction Details (EPA Originated)

Dear Uisce Éireann,

Condition 5.5 of the Wastewater Discharge Licence requires:

“Where a UV or other appropriate disinfection system is installed the licensee shall ensure that it is operating to the designed disinfection efficiency at all times. The disinfection efficiency of the system shall be measured to demonstrate that the system is operated within its design range. The records from this verification process shall be recorded and maintained”.

It is a legal requirement for Uisce Éireann to comply with Licence conditions.

In the event Uisce Éireann considers that operation of the UV system is not necessary for the protection of the environment and human health, it is a matter for Uisce Éireann to apply to have the licence reviewed/amended.

Annual Environmental Report

2024



EnnisNorth

D0048-01

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7 APPENDIX

1 EXECUTIVE SUMMARY AND INTRODUCTION TO THE 2024 AER

This Annual Environmental Report has been prepared for D0048-01, Ennis North, in Clare in accordance with the requirements of the wastewater discharge licence for the agglomeration. Specified reports where relevant are included as an appendix to the AER.

1.1 ANNUAL STATEMENT OF MEASURES

A summary of any improvements undertaken is provided where applicable.

There were no major capital or operational changes undertaken.

1.2 TREATMENT SUMMARY

The agglomeration is served by a wastewater treatment plant(s)

- Ennis North WWTP with a Plant Capacity PE of 31500, the treatment type is 3P - Tertiary P removal .

1.3 ELV OVERVIEW

The overall compliance of the final effluent with the Emission Limit Values (ELVs) is shown below. More detailed information on the below ELV's can be found in Section 2.

Discharge Point Reference	Treatment Plant	Discharge Type	Compliance Status	Parameters failing if relevant
TPEFF0300D0048SW001	Ennis North WWTP	Treated	Non-Compliant	Ammonia-Total (as N) mg/l

1.4 LICENCE SPECIFIC REPORTING

Assessment / Report

There are no Licence Specific Reports included in this AER.

2 TREATMENT PLANT PERFORMANCE AND IMPACT SUMMARY

2.1 ENNIS NORTH WWTP - TREATED DISCHARGE

2.1.1 INFLUENT MONITORING SUMMARY - ENNIS NORTH WWTP

A summary of influent monitoring for the treatment plant is presented below. This monitoring is primarily undertaken in order to determine the overall efficiency of the plant in removing pollutants from the raw wastewater.

Parameters	Number of Samples	Annual Max	Annual Mean
BOD, 5 days with Inhibition (Carbonaceous BOD) mg/l	13	288	99
Total Phosphorus (as P) mg/l	13	22	5.52
COD-Cr mg/l	13	590	234
Suspended Solids mg/l	13	312	94
Total Nitrogen mg/l	13	59	28
Hydraulic Capacity	N/A	19001	11771

If other inputs in the form of sludge / leachate are added to the WWTP then these are included in Section 2.1.5 if applicable.

Significance of Results:

The annual mean hydraulic loading is less than the peak Treatment Plant Capacity. The annual maximum hydraulic loading is greater than the peak Treatment Plant Capacity. Further details on the plant capacity and efficiency can be found under the sectional 'Operational Performance Summary'.

2.1.2 EFFLUENT MONITORING SUMMARY - TPEFF0300D0048SW001

Parameter	WWDL ELV (Schedule A)	ELV with Condition 2 Interpretation included Note 1	Interim % reduction from influent concentration	Number of sample results	Number of exceedances	Number of exceedances with Condition 2 Interpretation included	Annual Mean	Overall Compliance (Pass/Fail)
COD-Cr mg/l	125	250	N/A	14	N/A	N/A	24	Pass
Suspended Solids mg/l	35	87.5	N/A	14	N/A	N/A	5.74	Pass
Temperature °C	25	25	N/A	13	N/A	N/A	13	Pass
BOD, 5 days with Inhibition (Carbonaceous BOD) mg/l	10	20	N/A	14	1	N/A	3.34	Pass
pH pH units	9	9	N/A	14	N/A	N/A	7.38	Pass
Total Phosphorus (as P) mg/l	2	2.4	N/A	14	N/A	N/A	0.614	Pass
Ammonia-Total (as N) mg/l	1	1.2	N/A	14	3	3	0.881	Fail
ortho-Phosphate (as P) - unspecified mg/l	1	1.2	N/A	14	N/A	N/A	0.305	Pass
Dissolved Inorganic Nitrogen (as N) mg/l	N/A	N/A	N/A	13	N/A	N/A	9.79	

Parameter	WWDL ELV (Schedule A)	ELV with Condition 2 Interpretation included Note 1	Interim % reduction from influent concentration	Number of sample results	Number of exceedances	Number of exceedances with Condition 2 Interpretation included	Annual Mean	Overall Compliance (Pass/Fail)
Conductivity $\mu\text{S/cm}$	N/A	N/A	N/A	14	N/A	N/A	640	
Conductivity @20°C $\mu\text{S/cm}$	N/A	N/A	N/A	7	N/A	N/A	611	
Visual Inspection Descriptive	N/A	N/A	N/A	12	N/A	N/A	N/A	
Total Nitrogen mg/l	N/A	N/A	N/A	14	N/A	N/A	13	
Conductivity @ 25°C (on-site) $\mu\text{S/cm}$	N/A	N/A	N/A	7	N/A	N/A	668	

Notes:

1 – This represents the Emission Limit Values after the Interpretation provided for under Condition 2 of the licence is applied

2 – For pH the WWDA specifies a range of pH 6 - 9

Cause of Exceedance(s):

Refer to the incident section of this report.

Significance of Results:

The WWTP is non compliant with the ELV's set in the Wastewater Discharge Licence. The impact on receiving waters is assessed further in Section 2.

2.1.3 AMBIENT MONITORING SUMMARY FOR THE TREATMENT PLANT DISCHARGE TPEFF0300D0048SW001

A summary of monitoring from ambient monitoring points associated with the wastewater discharge is provided in the sections below. For discharges to rivers upstream (U/S) and downstream (D/S) location data is provided. For other ambient points in lakes, coastal or transitional waters, monitoring data from the most appropriate monitoring station is selected.

The table below provides details of ambient monitoring locations and details of any designations as sensitive areas.

Ambient Monitoring Point from WWDL (or as agreed with EPA)	Irish Grid Reference	River Station Code	Bathing Water	Drinking Water	FWPM	Shellfish	WFD Ecological Status
Upstream	133905, 177699	RS27F010680	No	No	No	No	Moderate
Upstream	134524, 177884	RS27F010700	No	No	No	No	Moderate
Upstream	134820, 177944	RS27F010710	No	No	No	No	Moderate
Downstream	134888, 176818	RS27F010720	No	No	No	No	Moderate

The table below provides a summary of monitoring results for designated ambient monitoring points. The upstream and downstream annual mean values are shown (mg/l), and the difference between both monitoring stations is given as a percentage of the Environmental Quality Standard (EQS) where relevant.

Parameter Name	Upstream Monitoring Point Location	Upstream Monitoring Point Annual Mean	Downstream Monitoring Point Location	Downstream Monitoring Point Annual Mean	EQS	% of EQS
BOD - 5 days (Total) mg/l	RS27F010700	0.904	RS27F010720	1.17	1.50	18
Ammonia-Total (as N) mg/l	RS27F010700	0.035	RS27F010720	0.106	0.065	109.1
ortho-Phosphate (as P) - unspecified mg/l	RS27F010700	0.021	RS27F010720	0.013	0.035	-22.3

Parameter Name	Upstream Monitoring Point Location	Upstream Monitoring Point Annual Mean	Downstream Monitoring Point Location	Downstream Monitoring Point Annual Mean	EQS	% of EQS
Cadmium - unspecified µg/l	RS27F010700	0.017	RS27F010720	N/A	N/A	
Beryllium - unfiltered µg/l	RS27F010700	0.707	RS27F010720	N/A	N/A	
Potassium - unspecified mg/l	RS27F010700	1.52	RS27F010720	N/A	N/A	
Total Nitrogen mg/l	RS27F010700	0.780	RS27F010720	0.971	N/A	
Dissolved Oxygen % Saturation	RS27F010700	89	RS27F010720	N/A	N/A	
pH pH units	RS27F010700	7.64	RS27F010720	8.00	N/A	
Total Oxidised Nitrogen (as N) mg/l	RS27F010700	0.378	RS27F010720	N/A	N/A	
Total Phosphorus (as P) mg/l	RS27F010700	0.053	RS27F010720	0.070	N/A	
Dissolved Oxygen % O2	RS27F010700	103	RS27F010720	91	N/A	
Aluminium - unspecified µg/l	RS27F010700	29	RS27F010720	N/A	N/A	
Cobalt - unspecified µg/l	RS27F010700	0.707	RS27F010720	N/A	N/A	
Calculated Hardness (CaCO3) mg/l	RS27F010700	153	RS27F010720	N/A	N/A	
Arsenic - unspecified µg/l	RS27F010700	0.707	RS27F010720	N/A	N/A	
Temperature °C	RS27F010700	12	RS27F010720	14	N/A	

Parameter Name	Upstream Monitoring Point Location	Upstream Monitoring Point Annual Mean	Downstream Monitoring Point Location	Downstream Monitoring Point Annual Mean	EQS	% of EQS
Silica (as SiO₂) mg/l	RS27F010700	2.22	RS27F010720	N/A	N/A	
Selenium - unspecified µg/l	RS27F010700	0.707	RS27F010720	N/A	N/A	
Uranium - unfiltered µg/l	RS27F010700	0.577	RS27F010720	N/A	N/A	
Vanadium - unspecified µg/l	RS27F010700	0.707	RS27F010720	N/A	N/A	
Dissolved Organic Carbon mg/l	RS27F010700	6.68	RS27F010720	N/A	N/A	
Barium - unspecified µg/l	RS27F010700	8.89	RS27F010720	N/A	N/A	
Chromium - unspecified µg/l	RS27F010700	0.740	RS27F010720	N/A	N/A	
Nickel - unspecified µg/l	RS27F010700	0.871	RS27F010720	N/A	N/A	
Molybdenum - unspecified µg/l	RS27F010700	0.707	RS27F010720	N/A	N/A	
Suspended Solids mg/l	RS27F010700	3.26	RS27F010720	N/A	N/A	
Mercury - unspecified µg/l	RS27F010700	0.050	RS27F010720	N/A	N/A	
Sodium - unspecified mg/l	RS27F010700	9.59	RS27F010720	N/A	N/A	
Manganese - unspecified µg/l	RS27F010700	26	RS27F010720	N/A	N/A	
Zinc - unspecified µg/l	RS27F010700	4.00	RS27F010720	N/A	N/A	
True Colour mg/litre Pt Co	RS27F010700	35	RS27F010720	N/A	N/A	

Parameter Name	Upstream Monitoring Point Location	Upstream Monitoring Point Annual Mean	Downstream Monitoring Point Location	Downstream Monitoring Point Annual Mean	EQS	% of EQS
Calcium - unspecified mg/l	RS27F010700	54	RS27F010720	N/A	N/A	
Copper - unspecified µg/l	RS27F010700	1.86	RS27F010720	N/A	N/A	
Boron - unspecified µg/l	RS27F010700	17	RS27F010720	N/A	N/A	
Dissolved Oxygen mg/l	RS27F010700	9.34	RS27F010720	9.02	N/A	
Magnesium - unspecified mg/l	RS27F010700	4.07	RS27F010720	N/A	N/A	
BOD, 5 days with Inhibition (Carbonaceous BOD) mg/l	RS27F010700	0.950	RS27F010720	1.13	N/A	
Conductivity @25°C µS/cm	RS27F010700	381	RS27F010720	N/A	N/A	
Alkalinity-total (as CaCO3) mg/l	RS27F010700	159	RS27F010720	N/A	N/A	
Chloride mg/l	RS27F010700	17	RS27F010720	N/A	N/A	
Antimony - unspecified µg/l	RS27F010700	0.707	RS27F010720	N/A	N/A	
Thallium - unspecified µg/l	RS27F010700	0.141	RS27F010720	N/A	N/A	
Iron - unspecified µg/l	RS27F010700	142	RS27F010720	N/A	N/A	
Strontium - unfiltered µg/l	RS27F010700	87	RS27F010720	N/A	N/A	
Lead - unspecified µg/l	RS27F010700	1.00	RS27F010720	N/A	N/A	

Significance of Results:

The WWTP discharge was not compliant with the ELV's set in the wastewater discharge licence for the following: Ammonia-Total (as N) mg/l.

The ambient monitoring results do not meet the required EQS at the downstream monitoring location. The EQS relates to the Oxygenation and Nutrient Conditions set out in the Surface Water Regulations 2009.

Based on ambient monitoring results a deterioration in Ammonia, BOD, BOD with inhibition, pH, Temperature, Total Nitrogen, Total Phosphorus., concentrations downstream of the effluent discharge is noted.

A deterioration in water quality has been identified, however it is not known if it or is not caused by the WWTP.

Other causes of deterioration in water quality in the area are unknown.

The discharge from the wastewater treatment plant does not have an observable negative impact on the Water Framework Directive status.

2.1.4 OPERATIONAL PERFORMANCE SUMMARY - ENNIS NORTH WWTP

2.1.4.1 Treatment Efficiency Report - Ennis North WWTP

Treatment efficiency is based on the removal of key pollutants from the influent wastewater by the treatment plant. In essence the calculation is based on the balance of load coming into the plant versus the load leaving the plant. The efficiency is presented as a percentage removal rate.

A summary presentation of the efficiency of the treatment process including information for all the parameters specified in the licence is included below:

Parameter	Influent mass loading (kg/year)	Effluent mass emission (kg/year)	Efficiency (% reduction of influent load)
TN	109092	43905	60
TP	21356	2133	90
COD	905952	84383	91
SS	364254	19925	95
cBOD	383735	11602	97

Note: The above data is based on sample results for the number of dates reported

2.1.4.2 Treatment Capacity Report Summary - Ennis North WWTP

Treatment capacity is an assessment of the hydraulic (flow) and organic (the amount of pollutants) load a treatment plant is designed to treat versus the current loading of that plant.

Ennis North WWTP	
Peak Hydraulic Capacity (m ³ /day) - As Constructed	16272
DWF to the Treatment Plant (m ³ /day)	6784
Current Hydraulic Loading - annual max (m ³ /day)	19001
Average Hydraulic loading to the Treatment Plant (m ³ /day)	11771.02
Organic Capacity (PE) - As Constructed	31500
Organic Capacity (PE) - Collected Load (peak week) ^{Note1}	25500
Organic Capacity (PE) - Remaining	6000
Will the capacity be exceeded in the next three years? (Yes/No)	No

Nominal design capacities can be based on conservative design principles. In some cases assessment of existing plants has shown organic capacities significantly higher than the nominal design capacity. Accordingly plants that appear to be overloaded when comparing a collected peak load with the nominal design capacity can be fully compliant due to the safety factors in the original design.

2.1.5 SLUDGE / OTHER INPUTS - ENNIS NORTH WWTP

'Other inputs' to the waste water treatment plant are summarised in table below

Input type	Quantity	Unit	P.E.	% of load to WWTP	Included in Influent Monitoring (Y/N)?	Is there a leachate/sludge acceptance procedure for the WWTP?	Is there a dedicated leachate/sludge acceptance facility for the WWTP? (Y/N)
There is no Sludge and Other Input data for the Treatment Plant included in the AER.							

3 COMPLAINTS AND INCIDENTS

3.1 COMPLAINTS SUMMARY

A summary of complaints of an environmental nature related to the discharge(s) to water from the WWTP and network is included below.

Number of Complaints	Nature of Complaint	Number Open Complaints	Number Closed Complaints
There were no relevant environmental complaints in 2024.			

3.2 REPORTED INCIDENTS SUMMARY

Environmental incidents that arise in an agglomeration are reported on an on-going basis in accordance with our waste water discharge licences. Where an incident occurs and it is reportable under the licence, it is reported to the Environmental Protection Agency through their Environmental Data Exchange Network, or in some instances by telephone. Some incidents which arise in the agglomeration are recorded by Uisce Éireann but may not be reportable under our licence for example where the incident does not have an impact on environmental performance.

A summary of reported incidents is included below.

3.2.1 SUMMARY OF INCIDENTS

Incident Type	Cause	Recurring (Y/N)	Closed (Y/N)
Breach of ELV	Plant or equipment breakdown at WWTP	No	Yes
Breach of ELV	Adverse Weather	No	Yes
Abatement equipment off-line	Plant or equipment breakdown at WWTP	No	Yes

Incident Type	Cause	Recurring (Y/N)	Closed (Y/N)
Abatement Equipment offline	Plant or equipment breakdown at WWTP	No	Yes

3.2.2 SUMMARY OF OVERALL INCIDENTS

Question	Answer
Number of Incidents in 2024	4
Number of Incidents reported to the EPA via EDEN in 2024	4
Explanation of any discrepancies between the two numbers above	N/A

4 INFRASTRUCTURAL ASSESSMENTS AND PROGRAMME OF IMPROVEMENTS

4.1 STORM WATER OVERFLOW IDENTIFICATION AND INSPECTION REPORT

A summary of the operation of the storm water overflows and their significance where known is included below:

4.1.1 SWO IDENTIFICATION

WWDL Name / Code for Storm Water Overflow (chamber) where applicable	Irish Grid Ref. (outfall)	Included in Schedule of the WWDL	Significance of the overflow(High / Medium / Low)	Assessed against DoEHLG Criteria	No. of times activated in 2024 (No. of events)	Total volume discharged in 2024 (m3)	Monitoring Status
SW2	134851, 177466	Yes	Low Significance	Not Meeting Criteria	Unknown	485892	Monitored
SW3	134350, 177741	Yes	Low Significance	Not Meeting Criteria	Unknown	Unknown	Monitored
SW4	134682, 177994	Yes	Low Significance	Not Meeting Criteria	Unknown	Unknown	Monitored
TBC	134436, 180553	No	Low Significance	Meeting Criteria	Unknown	Unknown	Monitored
TBC	134350, 177741	No	Low Significance	Meeting Criteria	Unknown	Unknown	Not Monitored

The contents presented in this table include the most up to date information available at the time of writing. Any TBC SWO(s) were identified as part of the on-going National SWO programme and will be updated in subsequent AER(s) once the information is confirmed.

SWO Summary	
How much wastewater discharge by metered SWOs during the year (m3)?	485892
Is each SWO identified as not meeting DoEHLG Guidance included in the Programme of Improvements?	No
The SWO Assessment included the requirements of relevant of WWDL schedules?	No
Have the EPA been advised of any additional SWOs / changes to Schedule C3 and A4 under Condition 1.7?	N/A

4.2 REPORT ON PROGRESS MADE AND PROPOSALS BEING DEVELOPED TO MEET THE IMPROVEMENT PROGRAMME REQUIREMENTS.

4.2.1 SPECIFIED IMPROVEMENT PROGRAMME SUMMARY

A wastewater discharge licence may require a number of reports on specific subject areas to be prepared for the agglomeration in question. These reports are submitted to the EPA as part of the Annual Environmental Report. This section provides a list of the various reports required for this agglomeration and a brief summary of their recommendations.

Specified Improvement Programmes (under Schedule A and C of WWDL)	Description	Licence Schedule	Licence Completion Date	Date Expired? (N/NA/Y)	Status of Works	Timeframe for Completing the Work	Comments
D0048-SIP:01	Clonroadmore WWTP installation of tertiary treatment system.	C	31/12/2010	Yes	Works Completed		
D0048-SIP:02	Clonroadmore WWTP rehabilitation of the storm/balance tanks	C	31/12/2010	Yes	Works Completed		

Specified Improvement Programmes (under Schedule A and C of WWDL)	Description	Licence Schedule	Licence Completion Date	Date Expired? (N/NA/Y)	Status of Works	Timeframe for Completing the Work	Comments
D0048-SIP:03	Clonroadmore WWTP upgrade of the inlet works	C	31/12/2010	Yes	Works Completed		
D0048-SIP:04	Clonroadmore WWTP upgrade of the sludge handling facilities	C	31/12/2010	Yes	Works Completed		
D0048-SIP:05	Clonroadmore WWTP upgrade of the treatment capacity of the current aerator and clarifier tanks to cater for the existing and the short term increase in wastewater loading	C	31/12/2010	Yes	Works Completed		
D0048-SIP:06	collection systems: rehabilitation of sewers with high levels of infiltration.	C	31/12/2010	Yes	At Planning Stage	2037	Ennis DAP ongoing
D0048-SIP:07	collection systems: separation of known surface water connections from the main combined sewer where feasible.	C	31/12/2010	Yes	At Planning Stage	2037	Ennis DAP ongoing
D0048-SIP:08	collection systems: upgrade of satellite pump station overflows	C	31/12/2010	Yes	At Planning Stage	2037	Ennis DAP ongoing
D0048-SIP:09	Secondary discharge from SW2 to be upgraded to a SWO, as defined in DoEHLG 'Procedures & criteria in relation to SWOs'	A	01/01/2011	Yes	Works Completed		

Specified Improvement Programmes (under Schedule A and C of WWDL)	Description	Licence Schedule	Licence Completion Date	Date Expired? (N/NA/Y)	Status of Works	Timeframe for Completing the Work	Comments
D0048-SIP:10	Tulla road and Francis st pump stations: diversion of surface water away from pump stations	C	31/12/2010	Yes	At Planning Stage	2037	Ennis DAP ongoing
D0048-SIP:11	Tulla road and Francis st pump stations: repair of grit traps	C	31/12/2010	Yes	Works Completed		
D0048-SIP:12	Tulla road and Francis st pump stations: replacement of pumps and improving the pump controls	C	31/12/2010	Yes	At Planning Stage	2037	Ennis DAP ongoing
D0048-SIP:13	Tulla road and Francis st pump stations: upgrade of the combined sewer overflow regime at the pump stations	C	31/12/2010	Yes	At Planning Stage	2037	Ennis DAP ongoing

A summary of the status of any other improvements identified by under Condition 5 assessments- is included below.

4.2.2 IMPROVEMENT PROGRAMME SUMMARY

Improvement Identifier	Improvement Description / or any Operational Improvements	Improvement Source	Expected Completion Date	Comments
No additional improvements planned at this time.				

4.2.3 SEWER INTEGRITY RISK ASSESSMENT

The utilisation of multiple capital maintenance programmes and the outputs of the workshops with the Local Authority Operations Staff held under the programme can be used to satisfy the requirements of Condition 5 regarding network integrity. Improvement works identified by way of these programmes and workshops will be included in the Improvements Summary Tables 4.2.1 and 4.2.2.

5 LICENCE SPECIFIC REPORTS

A wastewater discharge licence may require a number of reports on specific subject areas to be prepared for the agglomeration in question. These reports are submitted to the EPA as part of the Annual Environmental Report. This section provides a list of the various reports required for this agglomeration and a brief summary of their recommendations.

Licence Specific Report	Required by licence	Included in this AER
There is no Licence Specific Report Required in this AER Annual Review.		

6 CERTIFICATION AND SIGN OFF

6.1 SUMMARY OF AER CONTENTS

Parameter	Answer
Does the AER include an Executive Summary?	Yes
Does the AER include an assessment of the performance of the Waste Water Works (i.e. have the results of assessments been interpreted against WWDL requirements and or Environmental Quality Standards)?	Yes
Is there a need to advise the EPA for Consideration of a Technical Amendment/Review of the Licence?	Yes
List reason e.g. additional SWO identified	Additional SWOs
Is there a need to request/advise the EPA of any modification to the existing WWDL with respect to condition 4 changes to monitoring location, frequency etc	N/A
List reason e.g. changes to monitoring requirements	N/A
Have these processes commenced?	N/A
Are all outstanding reports and assessments from previous AERs included as an appendix to this AER	No

I certify that the information given in this Annual Environmental Report is truthful, accurate and complete:

Signed: Date: 19/11/2025

This AER has been produced by Uisce Éireann's Environmental Information System (EIMS) and has been electronically signed off in that system for and on behalf of ,

Eleanor Roche

Head of Environmental Regulation.

7 APPENDIX

There are no Appendices included

Site Visit Report

The site visit process is a sample on a particular day of an installation's compliance with some of its licence conditions. Where non-compliance against a particular condition has not been reported, this should not be construed to mean that there is full compliance with that condition of the licence.

Instructions and actions arising from the visit shall be addressed, or where applicable noted, by the licensee in order to ensure compliance, to improve the environmental performance of the installation and to provide clarification on certain issues.

The licensee shall take the actions specified to close out the non-compliances and observations raised in this Site Visit Report.

The licensee may also be requested to provide a response to the Environmental Protection Agency (hereafter referred to as the Agency) in relation to the site visit report findings.

Licensee	
Name of Installation	Kilmihil
Licensee	Uisce Éireann
Licence Register No.	A0091-01
CRO Number	530363
Site Address	Clare
Site Visit Reference No.	SV34592

Report Detail	
Issue Date	30/01/2026
Prepared By	Brian Flynn

Site Visit Detail			
Date Of Inspection	23/01/2026		
Time In	11:00	Time Out	12:00
EPA Inspector(s)	Brian Flynn		
Additional Visitors			
Licensee Personnel and Role	Representing Uisce Éireann (UÉ): Gerard Maher, Róisín Breheny, Declan Kavanagh, and Derek O'Toole. Representing Clare County Council (working in partnership with Uisce Éireann): Michael Hoare.		

> Summary

The EPA carried out an inspection on the 23/01/2026 of the Uisce Éireann Kilmihil Waste Water Treatment Plant (WWTP) to check compliance with the Certificate of Authorisation (COA).

The findings of the inspection are set out below including further actions required by Uisce Éireann.

Uisce Éireann shall ensure that the Kilmihil Waste Water Treatment Plant complies with the conditions of the Certificate of Authorisation.

> Site Areas Inspected

- Wastewater Treatment Plant.

> Documents Inspected

- Ambient monitoring data for 2024 and 2025,
- Effluent monitoring data for 2024 and 2025,
- Design Population Equivalent (P.E.) and current P.E.
- Information on Storm Water Overflows in the Agglomeration,
- Update on upgrade of the WWTP.

> 1. Certificates of Authorisations

	Answer	Condition Number	Non Compliance	Observation
1.1	Is the plant overloaded?	Yes		
Comment / Action Required				
The plant is designed to treat a population equivalent (P.E.) of 500 and is receiving 536 P.E.				
An overflow was occurring (via SW002) at the weir after the screen at the inlet works. This was in dry weather conditions. Uisce Éireann have reported that this Storm Water Overflow is not meeting department criteria (operates in dry weather).				
Uisce Éireann are required to:				
<ul style="list-style-type: none">• Respond to the relevant action in the Compliance Investigation Request For Information due by the 30-06-2026.				
	Answer	Condition Number	Non Compliance	Observation
1.2	Is there evidence of pollution at, or downstream of, the discharge point to the receiving water, or along the conduit?	Yes		
Comment / Action Required				

This discharge pipe from the Waste Water Treatment Plant takes secondary treated effluent and untreated wastewater from both Storm Water Overflows.

There was discoloration and sewage fungus in the river bed at the final discharge point (see photograph No.1).

Uisce Éireann are required to:

- Respond to the relevant action in the Compliance Investigation Request For Information due by the 30-06-2026.

1.3

	Answer	Condition Number	Non Compliance	Observation
Has the agglomeration population equivalent collected load increased to 500 p.e or greater?	Yes			

Comment / Action Required

The plant is designed to treat a population equivalent (P.E.) of 500 and is receiving 536 P.E. Waste Water Treatment plants that receive a population equivalent greater than 500 require a Waste Water Discharge Licence under the European Union (Waste Water Discharge) Regulations 2007 to 2020.

Uisce Éireann are required to:

- Respond to the relevant action in the Compliance Investigation Request For Information due by the 30-06-2026.



2. Water Framework Directive

2.1

	Answer	Condition Number	Non Compliance	Observation
Is the agglomeration categorised as a significant pressure under the Water Framework Directive?	Yes			
Comment / Action Required				
<p>The Kilmihil agglomeration is categorised as a significant pressure under the Water Framework Directive and is listed on the EPA's Priority Action List. Ambient monitoring data submitted by Uisce Éireann indicates that the Kilmihil stream (KILMIHIL STREAM_010) is significantly adversely impacted as a result of the treatment plant's inability to provide sufficient treatment and treatment capacity.</p> <p>Uisce Éireann are Required to:</p> <ul style="list-style-type: none"> Respond to the relevant action in the Compliance Investigation Request For Information due by the 30-06-2026. 				

2.2

	Answer	Condition Number	Non Compliance	Observation
Are corrective actions being progressed to address the significant pressure?	Yes			
Comment / Action Required				
<p>An upgrade of the Kilmihil WWTP is underway and it is currently at stage 3: Final Business case. Uisce Éireann personnel stated that an planning permission application is planned to be submitted in Q1 2026.</p> <p>Uisce Éireann are required to:</p> <ul style="list-style-type: none"> Respond to the relevant action in the Compliance Investigation Request For Information due by the 30-06-2026. 				



Photographs



Photograph No. 1: Discoloration and sewage fungus in the river bed at the final discharge point.

FOLLOW-UP ACTIONS

The licensee is required to complete the actions outlined in this site visit report within the specified timeframes. Where required, the licensee shall also respond to actions specified in Compliance Investigations and/or submit a response to this site visit report via the EDEN system. The licensee shall maintain a documentary evidence, for review by the Agency, that the prescribed actions were completed within the required timeframe.

(i) Compliance Investigations

The Agency may generate a Compliance Investigation through the EDEN system and issue instructions and actions to the licensee. The licensee will receive notification when an instruction or action is issued and the licensee must respond to the actions within the Compliance Investigation within the specified timeframe.

(ii) Response to Site Visit Report

Where the licensee is requested to (or wishes to) respond to the Agency in relation to this site visit report, the licensee may select the 'Make a Response' link on the Site Visits page in EDEN where a .pdf document containing the response can be attached and submitted. The response should include details of the actions taken by the licensee to address the issues raised in this site visit report and the target completion dates. This Licensee Public Response provides the licensee with an opportunity to inform both the Agency and the public about the implementing of actions set out in the Agency site visit report. The response must be submitted **within 21 calendar days** of the issue date of this site visit report.

(iii) Publication of Reports

This site visit report will be published on the EPA's website, www.epa.ie, 30 calendar days after the site visit report issue date.

Any licensee response to this site visit report will be published on the EPA's website simultaneously (i.e. 30 calendar days after the site visit report issue date).

Please note that licensees are required to comply with the conditions of the licence at all times, and where non-compliance occurs, compliance must be restored within the shortest possible time. These actions will be verified during subsequent Agency visits. Please quote the above Inspection Reference Number in any correspondence in relation this Report.

Annual Environmental Report

2024



Lahinch

D0080-01

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- 1.2 TREATMENT SUMMARY
- 1.3 ELV OVERVIEW
- 1.4 LICENSE SPECIFIC REPORT INCLUDED IN AER

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- 2.1 LAHINCH WWTP - TREATED DISCHARGE
 - 2.1.1 INFLUENT SUMMARY - LAHINCH WWTP
 - 2.1.2 EFFLUENT MONITORING SUMMARY - LAHINCH WWTP -
 - 2.1.3 AMBIENT MONITORING SUMMARY FOR THE TREATMENT PLANT DISCHARGE -
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7 APPENDIX

- 7.1 AMBIENT MONITORING SUMMARY

Revision Number	Description of Change	Date of Approval
1	Changes to section 1.2 Treatment Summary and 2.1.4.2 Treatment Capacity Report Summary - Lahinch WWTP	19/11/2025

1 EXECUTIVE SUMMARY AND INTRODUCTION TO THE 2024 AER

This Annual Environmental Report has been prepared for D0080-01, Lahinch, in Clare in accordance with the requirements of the wastewater discharge licence for the agglomeration. Specified reports where relevant are included as an appendix to the AER.

1.1 ANNUAL STATEMENT OF MEASURES

A summary of any improvements undertaken is provided where applicable.

There were no major capital or operational changes undertaken.

1.2 TREATMENT SUMMARY

The agglomeration is served by a wastewater treatment plant(s)

- Lahinch WWTP with a Plant Capacity PE of 3500, the treatment type is 2 - Secondary treatment .

1.3 ELV OVERVIEW

The overall compliance of the final effluent with the Emission Limit Values (ELVs) is shown below. More detailed information on the below ELV's can be found in Section 2.

Discharge Point Reference	Treatment Plant	Discharge Type	Compliance Status	Parameters failing if relevant
TPEFF0300D0080SW001	Lahinch WWTP	Treated	Non-Compliant	Ammonia-Total (as N) mg/l BOD, 5 days with Inhibition (Carbonaceous BOD) mg/l COD-Cr mg/l Suspended Solids mg/l Total Phosphorus (as P) mg/l

1.4 LICENCE SPECIFIC REPORTING

Assessment / Report
There are no Licence Specific Reports included in this AER.

2 TREATMENT PLANT PERFORMANCE AND IMPACT SUMMARY

2.1 LAHINCH WWTP - TREATED DISCHARGE

2.1.1 INFLUENT MONITORING SUMMARY - LAHINCH WWTP

A summary of influent monitoring for the treatment plant is presented below. This monitoring is primarily undertaken in order to determine the overall efficiency of the plant in removing pollutants from the raw wastewater.

Parameters	Number of Samples	Annual Max	Annual Mean
COD-Cr mg/l	12	1433	402
Total Nitrogen mg/l	12	83	42
Total Phosphorus (as P) mg/l	12	9.30	4.96
Suspended Solids mg/l	12	1920	309
BOD, 5 days with Inhibition (Carbonaceous BOD) mg/l	12	427	153
Hydraulic Capacity	N/A	1351	926

If other inputs in the form of sludge / leachate are added to the WWTP then these are included in Section 2.1.5 if applicable.

Significance of Results:

The annual mean hydraulic loading is less than the peak Treatment Plant Capacity. The annual maximum hydraulic loading is less than the peak Treatment Plant Capacity. Further details on the plant capacity and efficiency can be found under the sectional 'Operational Performance Summary'.

2.1.2 EFFLUENT MONITORING SUMMARY - TPEFF0300D0080SW001

Parameter	WWDL ELV (Schedule A)	ELV with Condition 2 Interpretation included Note 1	Interim % reduction from influent concentration	Number of sample results	Number of exceedances	Number of exceedances with Condition 2 Interpretation included	Annual Mean	Overall Compliance (Pass/Fail)
COD-Cr mg/l	125	250	N/A	12	5	2	145	Fail
Suspended Solids mg/l	35	87.5	N/A	12	7	5	120	Fail
BOD, 5 days with Inhibition (Carbonaceous BOD) mg/l	25	50	N/A	12	5	5	82	Fail
Total Oxidised Nitrogen (as N) mg/l	15	18	N/A	12	N/A	N/A	0.552	Pass
Ammonia-Total (as N) mg/l	10	12	N/A	12	8	8	23	Fail
pH pH units	9	9	N/A	12	N/A	N/A	6.84	Pass
Total Phosphorus (as P) mg/l	2	2.4	N/A	12	4	4	2.42	Fail
Conductivity $\mu\text{S/cm}$	N/A	N/A	N/A	11	N/A	N/A	670	
Conductivity @20°C $\mu\text{S/cm}$	N/A	N/A	N/A	3	N/A	N/A	643	

Parameter	WWDL ELV (Schedule A)	ELV with Condition 2 Interpretation included Note 1	Interim % reduction from influent concentration	Number of sample results	Number of exceedances	Number of exceedances with Condition 2 Interpretation included	Annual Mean	Overall Compliance (Pass/Fail)
Faecal coliforms no./100mls	N/A	N/A	N/A	2	N/A	N/A	11634	
Conductivity @ 25°C (on-site) µS/cm	N/A	N/A	N/A	8	N/A	N/A	680	
Total Nitrogen mg/l	N/A	N/A	N/A	12	N/A	N/A	31	

Notes:

1 – This represents the Emission Limit Values after the Interpretation provided for under Condition 2 of the licence is applied

2 – For pH the WWDA specifies a range of pH 6 - 9

Cause of Exceedance(s):

Refer to the incident section of this report.

Significance of Results:

The WWTP is not in compliance with the ELV, as set by the WWDL. The impact on receiving waters is assessed in section 2.

2.1.3 AMBIENT MONITORING SUMMARY FOR THE TREATMENT PLANT DISCHARGE TPEFF0300D0080SW001

A summary of monitoring from ambient monitoring points associated with the wastewater discharge is provided in the sections below. For discharges to rivers upstream (U/S) and downstream (D/S) location data is provided. For other ambient points in lakes, coastal or transitional waters, monitoring data from the most appropriate monitoring station is selected.

The table below provides details of ambient monitoring locations and details of any designations as sensitive areas.

Ambient Monitoring Point from WWDL (or as agreed with EPA)	Irish Grid Reference	River Station Code	Bathing Water	Drinking Water	FWPM	Shellfish	WFD Ecological Status
Downstream	109150, 189327	RS281010600	No	No	No	No	Moderate

The results for ambient results and / or additional monitoring data sets are included in the **Appendix 7.1 - Ambient monitoring summary**

Significance of Results:

The WWTP discharge was not compliant with the ELV's set in the wastewater discharge licence.

The discharge from the wastewater treatment plant does not have an observable impact on the water quality.

The discharge from the wastewater treatment plant does not have an observable negative impact on the Water Framework Directive status.

2.1.4 OPERATIONAL PERFORMANCE SUMMARY - LAHINCH WWTP

2.1.4.1 Treatment Efficiency Report - Lahinch WWTP

Treatment efficiency is based on the removal of key pollutants from the influent wastewater by the treatment plant. In essence the calculation is based on the balance of load coming into the plant versus the load leaving the plant. The efficiency is presented as a percentage removal rate.

A summary presentation of the efficiency of the treatment process including information for all the parameters specified in the licence is included below:

Parameter	Influent mass loading (kg/year)	Effluent mass emission (kg/year)	Efficiency (% reduction of influent load)
TN	10717	6733	37
SS	79555	25870	67
TP	1278	520	59
COD	103512	31113	70

Parameter	Influent mass loading (kg/year)	Effluent mass emission (kg/year)	Efficiency (% reduction of influent load)
cBOD	39330	17651	55

Note: The above data is based on sample results for the number of dates reported

2.1.4.2 Treatment Capacity Report Summary - Lahinch WWTP

Treatment capacity is an assessment of the hydraulic (flow) and organic (the amount of pollutants) load a treatment plant is designed to treat versus the current loading of that plant.

Lahinch WWTP	
Peak Hydraulic Capacity (m ³ /day) - As Constructed	2034
DWF to the Treatment Plant (m ³ /day)	678
Current Hydraulic Loading - annual max (m ³ /day)	1351
Average Hydraulic loading to the Treatment Plant (m ³ /day)	925.69
Organic Capacity (PE) - As Constructed	3500
Organic Capacity (PE) - Collected Load (peak week) ^{Note1}	3154
Organic Capacity (PE) - Remaining	346
Will the capacity be exceeded in the next three years? (Yes/No)	No

Nominal design capacities can be based on conservative design principles. In some cases assessment of existing plants has shown organic capacities significantly higher than the nominal design capacity. Accordingly plants that appear to be overloaded when comparing a collected peak load with the nominal design capacity can be fully compliant due to the safety factors in the original design.

2.1.5 SLUDGE / OTHER INPUTS - LAHINCH WWTP

'Other inputs' to the waste water treatment plant are summarised in table below

Input type	Quantity	Unit	P.E.	% of load to WWTP	Included in Influent Monitoring (Y/N)?	Is there a leachate/sludge acceptance procedure for the WWTP?	Is there a dedicated leachate/sludge acceptance facility for the WWTP? (Y/N)
There is no Sludge and Other Input data for the Treatment Plant included in the AER.							

3 COMPLAINTS AND INCIDENTS

3.1 COMPLAINTS SUMMARY

A summary of complaints of an environmental nature related to the discharge(s) to water from the WWTP and network is included below.

Number of Complaints	Nature of Complaint	Number Open Complaints	Number Closed Complaints
There were no relevant environmental complaints in 2024.			

3.2 REPORTED INCIDENTS SUMMARY

Environmental incidents that arise in an agglomeration are reported on an on-going basis in accordance with our waste water discharge licences. Where an incident occurs and it is reportable under the licence, it is reported to the Environmental Protection Agency through their Environmental Data Exchange Network, or in some instances by telephone. Some incidents which arise in the agglomeration are recorded by Uisce Éireann but may not be reportable under our licence for example where the incident does not have an impact on environmental performance.

A summary of reported incidents is included below.

3.2.1 SUMMARY OF INCIDENTS

Incident Type	Cause	Recurring (Y/N)	Closed (Y/N)
Spillage	Blocked Sewer	No	Yes
Uncontrolled release	Adverse Weather	No	Yes
Other	WWTP biological sludge issue	No	Yes

Incident Type	Cause	Recurring (Y/N)	Closed (Y/N)
Uncontrolled release	Adverse Weather	No	No
Abatement equipment off-line	Plant or equipment breakdown at WWTP	No	Yes
Breach of ELV	WWTP upgrade required to meet ELV	Yes	No

3.2.2 SUMMARY OF OVERALL INCIDENTS

Question	Answer
Number of Incidents in 2024	6
Number of Incidents reported to the EPA via EDEN in 2024	6
Explanation of any discrepancies between the two numbers above	N/A

4 INFRASTRUCTURAL ASSESSMENTS AND PROGRAMME OF IMPROVEMENTS

4.1 STORM WATER OVERFLOW IDENTIFICATION AND INSPECTION REPORT

A summary of the operation of the storm water overflows and their significance where known is included below:

4.1.1 SWO IDENTIFICATION

WWDL Name / Code for Storm Water Overflow (chamber) where applicable	Irish Grid Ref. (outfall)	Included in Schedule of the WWDL	Significance of the overflow(High / Medium / Low)	Assessed against DoEHLG Criteria	No. of times activated in 2024 (No. of events)	Total volume discharged in 2024 (m3)	Monitoring Status
TBC	110270, 188259	Yes	Low Significance	Not Meeting Criteria	Unknown	Unknown	Monitored
TBC	109283, 187577	Yes	Low Significance	Meeting Criteria	Unknown	Unknown	Not Monitored

The contents presented in this table include the most up to date information available at the time of writing. Any TBC SWO(s) were identified as part of the on-going National SWO programme and will be updated in subsequent AER(s) once the information is confirmed.

SWO Summary	
How much wastewater discharge by metered SWOs during the year (m3)?	Unknown
Is each SWO identified as not meeting DoEHLG Guidance included in the Programme of Improvements?	No
The SWO Assessment included the requirements of relevant of WWDL schedules?	No
Have the EPA been advised of any additional SWOs / changes to Schedule C3 and A4 under Condition 1.7?	N/A

4.2 REPORT ON PROGRESS MADE AND PROPOSALS BEING DEVELOPED TO MEET THE IMPROVEMENT PROGRAMME REQUIREMENTS.

4.2.1 SPECIFIED IMPROVEMENT PROGRAMME SUMMARY

A wastewater discharge licence may require a number of reports on specific subject areas to be prepared for the agglomeration in question. These reports are submitted to the EPA as part of the Annual Environmental Report. This section provides a list of the various reports required for this agglomeration and a brief summary of their recommendations.

Specified Improvement Programmes (under Schedule A and C of WWDL)	Description	Licence Schedule	Licence Completion Date	Date Expired? (N/NA/Y)	Status of Works	Timeframe for Completing the Work	Comments
There are no Specified Improvement Programmes for this Agglomeration.							

A summary of the status of any other improvements identified by under Condition 5 assessments- is included below.

4.2.2 IMPROVEMENT PROGRAMME SUMMARY

Improvement Identifier	Improvement Description / or any Operational Improvements	Improvement Source	Expected Completion Date	Comments
No additional improvements planned at this time.				

4.2.3 SEWER INTEGRITY RISK ASSESSMENT

The utilisation of multiple capital maintenance programmes and the outputs of the workshops with the Local Authority Operations Staff held under the programme can be used to satisfy the requirements of Condition 5 regarding network integrity. Improvement works identified by way of these programmes and workshops will be included in the Improvements Summary Tables 4.2.1 and 4.2.2.

5 LICENCE SPECIFIC REPORTS

A wastewater discharge licence may require a number of reports on specific subject areas to be prepared for the agglomeration in question. These reports are submitted to the EPA as part of the Annual Environmental Report. This section provides a list of the various reports required for this agglomeration and a brief summary of their recommendations.

Licence Specific Report	Required by licence	Included in this AER
There is no Licence Specific Report Required in this AER Annual Review.		

6 CERTIFICATION AND SIGN OFF

6.1 SUMMARY OF AER CONTENTS

Parameter	Answer
Does the AER include an Executive Summary?	Yes
Does the AER include an assessment of the performance of the Waste Water Works (i.e. have the results of assessments been interpreted against WWDL requirements and or Environmental Quality Standards)?	Yes
Is there a need to advise the EPA for Consideration of a Technical Amendment/Review of the Licence?	Yes
List reason e.g. additional SWO identified	Capital upgrade
Is there a need to request/advise the EPA of any modification to the existing WWDL with respect to condition 4 changes to monitoring location, frequency etc	Yes
List reason e.g. changes to monitoring requirements	Ambient Monitoring Location Changes
Have these processes commenced?	No
Are all outstanding reports and assessments from previous AERs included as an appendix to this AER	No

I certify that the information given in this Annual Environmental Report is truthful, accurate and complete:

Signed: Date: 19/08/2025

This AER has been produced by Uisce Éireann's Environmental Information System (EIMS) and has been electronically signed off in that system for and on behalf of ,

Eleanor Roche

Head of Environmental Regulation.

7 APPENDIX

Appendix
Appendix 7.1 - Ambient monitoring summary

Ambient Points

Ambient Monitoring Point from WWDL (or as agreed with EPA)	Irish Grid Reference	EPA Feature Coding Tool code	Receiving Waters Designation (Y/N)				WFD Status
			Bathing Water	Drinking Water	FWPM	Shellfish	
RS28I010600	109150, 189327	TPEFF0300D0080SW001	No	No	No	No	Moderate

Ambient Impact Assessment Table

Parameter Name	Downstream Monitoring Point Location	Downstream Monitoring Point Annual Mean	EQS (Mean)	%EQS
BOD mg/l	RS28I010600	2.340	1.5	
Ortho-Phosphate (as P) mg/l	RS28I010600	0.015	0.035	
Ammonia (as N) mg/l	RS28I010600	0.390	0.065	
pH pH units	RS28I010600	7.820		
Dissolved Oxygen %saturation	RS28I010600	92.620		
Dissolved Oxygen mg/l	RS28I010600	9.458		
Temperature °C	RS28I010600	16.500		
Total Nitrogen (as N) mg/l	RS28I010600	1.200		

Ambient Data Tables

				Ammonia-Total (as N)	BOD, 5 days with Inhibition (Carbonaceous BOD)	Dissolved Oxygen	Dissolved Oxygen	ortho-Phosphate (as P) - unspecified	pH	Temperat ure	Total Nitrogen
Monitored Entity	Station	Monitoring Entity	Sample date	mg/l	mg/l	% Saturation	mg/l	mg/l	pH Units	°C	mg/l
Inagh	RS2810106 00	Downstream	26/07/2024	0.53	2.6	89.9	9.05	0.005	7.9	15.1	0.8
Inagh	RS2810106 00	Downstream	01/08/2024	0.23	5.1	89.23	9.12	0.005	8.4	14.4	1.6
Inagh	RS2810106 00	Downstream	30/08/2024	0.61	1.3	102.7	10.46	0.03	7.6	15.1	1.5
Inagh	RS2810106 00	Downstream	18/09/2024	0.52	1.5	86.5	8.67	0.005	7.6	21.4	1
Inagh	RS2810106 00	Downstream	26/11/2024	0.06	1.2	94.77	9.99	0.03	7.6	16.5	1.1
Mean				0.390	2.340	92.620	9.458	0.015	7.820	16.500	1.200

Note: Where the concentration in the result is less than the limit of detection (LOD), a value of LOD/sqrt(2) was used in calculating the mean and 95%ile concentrations.

Site Visit Report

The site visit process is a sample on a particular day of an installation's compliance with some of its licence conditions. Where non-compliance against a particular condition has not been reported, this should not be construed to mean that there is full compliance with that condition of the licence.

Instructions and actions arising from the visit shall be addressed, or where applicable noted, by the licensee in order to ensure compliance, to improve the environmental performance of the installation and to provide clarification on certain issues.

The licensee shall take the actions specified to close out the non-compliances and observations raised in this Site Visit Report.

The licensee may also be requested to provide a response to the Environmental Protection Agency (hereafter referred to as the Agency) in relation to the site visit report findings.

Licensee	
Name of Installation	Lahinch
Licensee	Uisce Éireann
Licence Register No.	D0080-01
CRO Number	530363
Site Address	Clare
Site Visit Reference No.	SV32833

Report Detail	
Issue Date	06/08/2025
Prepared By	Brian Flynn

Site Visit Detail			
Date Of Inspection	22/07/2025		
Time In	11:30	Time Out	13:00
EPA Inspector(s)	Brian Flynn Dr John Feehan		
Additional Visitors			
Licensee Personnel and Role	Representing Uisce Éireann: Teresa Burke, Derek O'Toole, Gerard Maher, Roísín Breheny and Shane Foudy.		

> Summary

The Lahinch Wastewater treatment Plant has been on the Priority Action List since 2016 and a Compliance Investigation has remained open since October 2015. This plant is still subject to frequent flooding events. The flooding of the WWTP is so frequent that the WWTP cannot maintain an appropriate sludge biomass therefore it cannot provide adequate and appropriate treatment. This effectively means that sewage from the Lahinch agglomeration receives very limited treatment before discharging into tidal areas on the Inagh river entering Liscannor bay in close proximity to the designated bathing water area. Uisce Éireann were instructed in the last site visit conducted on the 14/08/2024 to take interim measures to prevent the treatment plant from being flooded. No progress has been made on implementing any preventative measures.

Uisce Éireann personnel stated there are plans to submit a planning permission application in 2027 to build a new wastewater treatment plant that will treat sewage from Lahinch and Ennistymon agglomerations.

Uisce Éireann is not currently conducting ambient monitoring both upstream and downstream of the final discharge as per the required locations and for the parameter Faecal Coliforms as stated in the licence for Lahinch.

Uisce Éireann must conduct outstanding items from the previous site visit report such as conduct a flood risk assessment, implement a contingency plan to protect the Inagh estuary Special Area of Conservation and designated bathing waters in Lahinch.

> Site Areas Inspected

- Wastewater treatment plant

> Documents Inspected

- Final effluent monitoring data 2023, 2024 to the 12/03/2025;
- Ambient monitoring data 2023, 2024;
- Dates on which the Lahinch WWTP was flooded in 2024 to the 15/07/2025;
- Oxidation ditch operational data from 2023 to the 03/06/2025.

> 1. General

	Answer	Condition Number	Non Compliance	Observation
1.1	Have you had any emission limit value breaches in the past 12 months?	Yes		
Comment / Action Required				
<p>The Lahinch WWTP (See photograph No. 1) cannot provide adequate treatment to comply with the ELVs stated in the licence for this agglomeration.</p> <p>Significant breaches for multiple parameters have been recorded to-date in 2025 (See results below).</p> <p>It is noted that samples submitted to the agency on the 23/01/2025 and the 18/02/2025 were taken as grab samples. Compliance samples are required to be composite samples as stated in Schedule B.1 of the licence.</p> <p>Breaches of Emission Limit Value results for licensed parameters so-far in 2025:</p> <p><u>Ammonia-Total (as N):</u></p> <p>12/03/2025: 15.08 mg/l vs <u>10 mg/l ELV</u></p> <p>16/04/2025: 27.49 mg/l vs <u>10 mg/l ELV</u></p> <p>22/05/2025: 26.35 mg/l vs <u>10 mg/l ELV</u></p> <p>24/06/2025: 18.54 mg/l vs <u>10 mg/l ELV</u></p>				

Carbonaceous BOD:

18/02/2025: **111.6** mg/l vs 25 mg/l ELV

12/03/2025: **93** mg/l vs 25 mg/l ELV

16/04/2025: **65** mg/l vs 25 mg/l ELV

24/06/2025: **30** mg/l vs 25 mg/l ELV

COD:

18/02/2025: **248** mg/l vs 125 mg/l ELV

12/03/2025: **184** mg/l vs 125 mg/l ELV

16/04/2025: **126** mg/l vs 125 mg/l ELV

24/06/2025: **132** mg/l vs 125 mg/l ELV

Suspended Solids:

18/02/2025: **81** mg/l vs 35 mg/l ELV

12/03/2025: **84** mg/l vs 35 mg/l ELV

16/04/2025: **380** mg/l vs 35 mg/l ELV

24/06/2025: **58** mg/l vs 35 mg/l ELV

Total Phosphorous (as P):

18/02/2025: **3.1** mg/l vs 2 mg/l ELV

12/03/2025: **3.5** mg/l vs 2 mg/l ELV

16/04/2025: **4.68** mg/l vs 2 mg/l ELV

22/05/2025: **2.39** mg/l vs 2 mg/l ELV

24/06/2025: **2.52** mg/l vs 2 mg/l ELV

Uisce Éireann are required to:

- Prioritise the upgrade of the Lahinch WWTP as the way the plant is currently configured is posing a significant potential threat to the Inagh river estuary and designated bathing waters.
- Provide an update, including timeframes on the upgrade of this wastewater treatment plant.
- Clarify why the samples taken on the 23/01/2025 and 18/02/2025 were grab samples rather than composite samples as required in the licence for the Lahinch agglomeration.



2. Inlet Works

2.1

	Answer	Condition Number	Non Compliance	Observation
Is there screening in place at the inlet works?	Checked			
Comment / Action Required				
<p>There is a bar screen in place at the Lahinch WWTP. However, this bar screen is ineffective and does not prevent the majority of rags from entering the oxidation ditch.</p> <p>Uisce Éireann personnel stated that a Purchase Order has been raised and it is expected that a new screening mechanism will be installed within 10-12 weeks from the date on which the P.O was issued.</p> <p>Uisce Éireann are required to:</p> <ul style="list-style-type: none">• Ensure that the provision of a screening system occurs within a timely manner and is prioritised.				



3. Cone Test and Diluted Cone Test Observations

3.1

	Answer	Condition Number	Non Compliance	Observation
Does the full cone test reflect mixed liquor suspended solids levels in the plant?	Yes			
Comment / Action Required				
<p>A cone test was conducted during the site visit, a result of 15mls was obtained (See photograph No. 2). This result indicates there is no mixed liquor present in the oxidation ditch. Therefore, very limited treatment of wastewater can occur at the Lahinch Wastewater Treatment Plant as there is insufficient biomass of activated sludge to allow the plant to operate as a conventional Wastewater Treatment Plant. The WWTP was flooded for multiple days prior to the site visit which prevents MLSS from building up to an adequate level to provide treatment.</p> <p>Uisce Éireann are required to:</p> <ul style="list-style-type: none">• See actions in site specific issue section.				



4. Settling Tank/Final Clarifier

	Answer	Condition Number	Non Compliance	Observation
4.1	Is there any evidence of operational problems?	Yes		
Comment / Action Required				
<p>The final clarifier was flooded at the time of this site visit due to the plant's inability to discharge during high tide. The elevated water level in the tank prevented effective settlement (See photograph No. 3)</p> <p>Uisce Éireann are required to:</p> <ul style="list-style-type: none">• Implement immediate actions to prevent flooding occurring at WWTP.				



5. Site Specific Issues

	Answer	Condition Number	Non Compliance	Observation
5.1	Flooding of the Lahinch WWTP	Checked		Yes
Comment / Action Required				
<p>From the 1st of January 2025 to the 22nd of July 2025 the Lahinch WWTP has been reported as flooded for a total number of 41 days, (see Appendix No. 1). The continual flooding of this plant prevents the build up of an adequate biomass, this was evident in the cone test conducted during this site visit. The cone test recorded a result of 15 mls, which indicates that there is not a sufficient level of biomass to allow treatment of wastewater to occur (See photograph No. 2).</p> <p>Lahinch Wastewater Treatment Plant remains highly vulnerable to flooding, as demonstrated by the significant number of flood events recorded. Uisce Éireann were instructed in the site visit conducted in October 2024 and Compliance Investigation actions to conduct a flood risk assessment and develop contingency measures. This has not been completed. UÉ has indicated that flooding will be addressed in the design of the new WWTP. However, this is unsatisfactory given the long timeline for completion. Without interim measures, continued flooding will result in the discharge of inadequately treated effluent to sensitive receptors, including the Inagh River Estuary Special Area of Conservation and Lahinch Beach designated bathing water. Discharges from the Lahinch WWTP including the primary and unauthorised discharges to adjoining land drains during flooding events have a potential impact on human health if members of the public come into direct contact with these discharges. It is noted that the primary discharge flows for approximately 3.2 km until entering Liscannor bay and is approximately 4km from the designated bathing water area.</p> <p>Uisce Éireann are required to:</p> <ul style="list-style-type: none"> Conduct a risk assessment and contingency planning in relation to potential flooding of the current site to include preventative measures to mitigate against frequent flooding of the Lahinch Wastewater Treatment Plant. 				

	Answer	Condition Number	Non Compliance	Observation
5.2	Ambient monitoring.	Checked		Yes
Comment / Action Required				
<p>Uisce Éireann is not currently conducting ambient monitoring both upstream and downstream of the final discharge as per the required locations stated in the licence for Lahinch. Uisce Éireann conducts downstream ambient monitoring at the station (RS28I010600). However, this location is not specified in the licence for Lahinch. Uisce Éireann does not conduct ambient monitoring U/S of the final discharge.</p> <p>Ambient monitoring results for the period 2023, 2024 and 2025 to-date were requested prior to the site visit. Ambient data was submitted by Uisce Éireann. However, the excel spreadsheet did not contain data for 2025.</p> <p>It was noted that the parameter Faecal coliforms is not tested for, which is required to be tested bi-annually as per the licence. It is important that Uisce Éireann begins sampling for this parameter without delay given the proximity to the Lahinch WWTP.</p> <p>Ambient sampling is required to be conducted monthly, ambient monitoring data submitted by Uisce Éireann does not contain sampling data for each month.</p> <p>Uisce Éireann are required to:</p> <ul style="list-style-type: none"> Conduct ambient monitoring at locations specified in the licence without delay. Conduct ambient monitoring at the frequency specified in the licence for all parameters, and clarify why this was not conducted. Submit the outstanding ambient monitoring data for 2025 to-date. 				



Table one: Dates that the Lahinch WWTP was reported as being flooded so far in 2025.

Month in 2025	Dates	Number of days Lahinch WWTP is flooded per month in 2025
January	1 st , 2 nd , 3 rd , 4 th , 5 th , 6 th , 7 th , 10 th , 11 th , 12 th , 13 th , 19 th , 23 rd , 31 st	14
February	2 nd , 3 rd , 4 th , 24 th , 25 th , 26 th , 28 th	7
April	25 th , 26 th , 27 th , 28 th	4
May	27 th , 28 th , 29 th , 31 st	4
June	26 th , 27 th , 28 th , 29 th	4
July	15 th , 16 th , 17 th , 18 th , 19 th , 20 th , 21 st , 22 nd	8
Total Number of days Lahinch WWTP was flooded so far in 2025 out of a total of 203 days.		41



Photographs

Photograph No. 1: Overview of the oxidation ditch of the Lahinch Wastewater Treatment Plant.



Photograph No.2: Cone test conducted during the site visit indicating no biomass of activated sludge which means that the plant is not operating as a conventional Wastewater Treatment Plant.



Photograph No. 3: Final clarifiers at the Lahinch WWTP which were found to be flooded due to the plant not discharging during high tides on the day off this site visit (22nd of July 2025).



FOLLOW-UP ACTIONS

The licensee is required to complete the actions outlined in this site visit report within the specified timeframes. Where required, the licensee shall also respond to actions specified in Compliance Investigations and/or submit a response to this site visit report via the EDEN system. The licensee shall maintain a documentary evidence, for review by the Agency, that the prescribed actions were completed within the required timeframe.

(i) Compliance Investigations

The Agency may generate a Compliance Investigation through the EDEN system and issue instructions and actions to the licensee. The licensee will receive notification when an instruction or action is issued and the licensee must respond to the actions within the Compliance Investigation within the specified timeframe.

(ii) Response to Site Visit Report

Where the licensee is requested to (or wishes to) respond to the Agency in relation to this site visit report, the licensee may select the 'Make a Response' link on the Site Visits page in EDEN where a .pdf document containing the response can be attached and submitted. The response should include details of the actions taken by the licensee to address the issues raised in this site visit report and the target completion dates. This Licensee Public Response provides the licensee with an opportunity to inform both the Agency and the public about the implementing of actions set out in the Agency site visit report. The response must be submitted **within 21 calendar days** of the issue date of this site visit report.

(iii) Publication of Reports

This site visit report will be published on the EPA's website, www.epa.ie, 30 calendar days after the site visit report issue date.

Any licensee response to this site visit report will be published on the EPA's website simultaneously (i.e. 30 calendar days after the site visit report issue date).

Please note that licensees are required to comply with the conditions of the licence at all times, and where non-compliance occurs, compliance must be restored within the shortest possible time. These actions will be verified during subsequent Agency visits. Please quote the above Inspection Reference Number in any correspondence in relation this Report.

Annual Environmental Report

2024



Tulla

D0320-01

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7 APPENDIX

1 EXECUTIVE SUMMARY AND INTRODUCTION TO THE 2024 AER

This Annual Environmental Report has been prepared for D0320-01, Tulla, in Clare in accordance with the requirements of the wastewater discharge licence for the agglomeration. Specified reports where relevant are included as an appendix to the AER.

1.1 ANNUAL STATEMENT OF MEASURES

A summary of any improvements undertaken is provided where applicable.

There were no major capital works or operational changes undertaken.

1.2 TREATMENT SUMMARY

The agglomeration is served by a wastewater treatment plant(s)

- Tulla WWTP with a Plant Capacity PE of 2000, the treatment type is 3P - Tertiary P removal .

1.3 ELV OVERVIEW

The overall compliance of the final effluent with the Emission Limit Values (ELVs) is shown below. More detailed information on the below ELV's can be found in Section 2.

Discharge Point Reference	Treatment Plant	Discharge Type	Compliance Status	Parameters failing if relevant
TPEFF0300D0320SW001	Tulla WWTP	Treated	Non-Compliant	Ammonia-Total (as N) mg/l BOD, 5 days with Inhibition (Carbonaceous BOD) mg/l ortho-Phosphate (as P) - unspecified mg/l

1.4 LICENCE SPECIFIC REPORTING

Assessment / Report

There are no Licence Specific Reports included in this AER.

2 TREATMENT PLANT PERFORMANCE AND IMPACT SUMMARY

2.1 TULLA WWTP - TREATED DISCHARGE

2.1.1 INFLUENT MONITORING SUMMARY - TULLA WWTP

A summary of influent monitoring for the treatment plant is presented below. This monitoring is primarily undertaken in order to determine the overall efficiency of the plant in removing pollutants from the raw wastewater.

Parameters	Number of Samples	Annual Max	Annual Mean
BOD, 5 days with Inhibition (Carbonaceous BOD) mg/l	7	438	64
Total Phosphorus (as P) mg/l	7	5.14	2.13
COD-Cr mg/l	7	735	173
Suspended Solids mg/l	7	64	34
Total Nitrogen mg/l	7	37	19
Hydraulic Capacity	N/A	14127	373

If other inputs in the form of sludge / leachate are added to the WWTP then these are included in Section 2.1.5 if applicable.

Significance of Results:

The annual mean hydraulic loading is less than the peak Treatment Plant Capacity. The annual maximum hydraulic loading is greater than the peak Treatment Plant Capacity. Further details on the plant capacity and efficiency can be found under the sectional 'Operational Performance Summary'.

2.1.2 EFFLUENT MONITORING SUMMARY - TPEFF0300D0320SW001

Parameter	WWDL ELV (Schedule A)	ELV with Condition 2 Interpretation included Note 1	Interim % reduction from influent concentration	Number of sample results	Number of exceedances	Number of exceedances with Condition 2 Interpretation included	Annual Mean	Overall Compliance (Pass/Fail)
COD-Cr mg/l	125	250	N/A	7	N/A	N/A	19	Pass
Suspended Solids mg/l	35	87.5	N/A	7	N/A	N/A	7.56	Pass
BOD, 5 days with Inhibition (Carbonaceous BOD) mg/l	10	20	N/A	7	1	1	4.28	Fail
pH pH units	9	9	N/A	7	N/A	N/A	7.53	Pass
Ammonia-Total (as N) mg/l	1.3	1.56	N/A	7	1	1	1.73	Fail
ortho-Phosphate (as P) - unspecified mg/l	0.7	0.84	N/A	7	1	1	0.193	Fail
Total Phosphorus (as P) mg/l	N/A	N/A	N/A	7	N/A	N/A	0.369	
Total Nitrogen mg/l	N/A	N/A	N/A	7	N/A	N/A	12	
Visual Inspection Descriptive	N/A	N/A	N/A	3	N/A	N/A	N/A	

Notes:

1 – This represents the Emission Limit Values after the Interpretation provided for under Condition 2 of the licence is applied

2 – For pH the WWDA specifies a range of pH 6 - 9

Cause of Exceedance(s):

Refer to Incident Section of this report.

Significance of Results:

The WWTP is non compliant with the ELV's set in the Wastewater Discharge Licence. The impact on receiving waters is assessed further in Section 2.

2.1.3 AMBIENT MONITORING SUMMARY FOR THE TREATMENT PLANT DISCHARGE TPEFF0300D0320SW001

A summary of monitoring from ambient monitoring points associated with the wastewater discharge is provided in the sections below. For discharges to rivers upstream (U/S) and downstream (D/S) location data is provided. For other ambient points in lakes, coastal or transitional waters, monitoring data from the most appropriate monitoring station is selected.

The table below provides details of ambient monitoring locations and details of any designations as sensitive areas.

Ambient Monitoring Point from WWDL (or as agreed with EPA)	Irish Grid Reference	River Station Code	Bathing Water	Drinking Water	FWPM	Shellfish	WFD Ecological Status
Upstream	149239, 177513	RS27L010110	No	No	No	No	Poor
Downstream	149462, 177561	RS27L010120	No	No	No	No	Poor

The table below provides a summary of monitoring results for designated ambient monitoring points. The upstream and downstream annual mean values are shown (mg/l), and the difference between both monitoring stations is given as a percentage of the Environmental Quality Standard (EQS) where relevant.

Parameter Name	Upstream Monitoring Point Location	Upstream Monitoring Point Annual Mean	Downstream Monitoring Point Location	Downstream Monitoring Point Annual Mean	EQS	% of EQS
BOD, 5 days with Inhibition (Carbonaceous BOD) mg/l	RS27L010110	0.957	RS27L010120	1.21	1.50	16.7
Ammonia-Total (as N) mg/l	RS27L010110	0.012	RS27L010120	0.012	0.065	0
ortho-Phosphate (as P) - unspecified mg/l	RS27L010110	0.025	RS27L010120	0.025	0.035	0
Suspended Solids mg/l	RS27L010110	6.00	RS27L010120	5.00	N/A	
Dissolved Oxygen % O2	RS27L010110	91	RS27L010120	99	N/A	
COD-Cr mg/l	RS27L010110	22	RS27L010120	28	N/A	
Temperature °C	RS27L010110	11	RS27L010120	10	N/A	
pH pH units	RS27L010110	7.89	RS27L010120	7.92	N/A	
Dissolved Oxygen mg/l	RS27L010110	9.47	RS27L010120	9.58	N/A	

Significance of Results:

The WWTP discharge was not compliant with the ELV's set in the wastewater discharge licence.

The ambient monitoring results meet the required EQS. The EQS relates to the Oxygenation and Nutrient Conditions set out in the Surface Water Regulations 2009.

Based on ambient monitoring results a deterioration in BOD with inhibition, COD, Dissolved Oxygen % O2, Dissolved Oxygen, pH, concentrations downstream of the effluent discharge is noted.

A deterioration in water quality has been identified, however it is not known if it or is not caused by the WWTP.

Other causes of deterioration in water quality in the area are unknown.

The discharge from the wastewater treatment plant does not have an observable negative impact on the Water Framework Directive status.

2.1.4 OPERATIONAL PERFORMANCE SUMMARY - TULLA WWTP

2.1.4.1 Treatment Efficiency Report - Tulla WWTP

Treatment efficiency is based on the removal of key pollutants from the influent wastewater by the treatment plant. In essence the calculation is based on the balance of load coming into the plant versus the load leaving the plant. The efficiency is presented as a percentage removal rate.

A summary presentation of the efficiency of the treatment process including information for all the parameters specified in the licence is included below:

Parameter	Influent mass loading (kg/year)	Effluent mass emission (kg/year)	Efficiency (% reduction of influent load)
TP	519	60	88
COD	42015	3129	93
TN	4574	2014	56
SS	8260	1240	85
cBOD	15656	702	96

Note: The above data is based on sample results for the number of dates reported

2.1.4.2 Treatment Capacity Report Summary - Tulla WWTP

Treatment capacity is an assessment of the hydraulic (flow) and organic (the amount of pollutants) load a treatment plant is designed to treat versus the current loading of that plant.

Tulla WWTP	
Peak Hydraulic Capacity (m ³ /day) - As Constructed	1350
DWF to the Treatment Plant (m ³ /day)	450

Tulla WWTP	
Current Hydraulic Loading - annual max (m ³ /day)	14127
Average Hydraulic loading to the Treatment Plant (m ³ /day)	373.16
Organic Capacity (PE) - As Constructed	2000
Organic Capacity (PE) - Collected Load (peak week) ^{Note1}	940
Organic Capacity (PE) - Remaining	1060
Will the capacity be exceeded in the next three years? (Yes/No)	No

Nominal design capacities can be based on conservative design principles. In some cases assessment of existing plants has shown organic capacities significantly higher than the nominal design capacity. Accordingly plants that appear to be overloaded when comparing a collected peak load with the nominal design capacity can be fully compliant due to the safety factors in the original design.

2.1.5 SLUDGE / OTHER INPUTS - TULLA WWTP

'Other inputs' to the waste water treatment plant are summarised in table below

Input type	Quantity	Unit	P.E.	% of load to WWTP	Included in Influent Monitoring (Y/N)?	Is there a leachate/sludge acceptance procedure for the WWTP?	Is there a dedicated leachate/sludge acceptance facility for the WWTP? (Y/N)
There is no Sludge and Other Input data for the Treatment Plant included in the AER.							

3 COMPLAINTS AND INCIDENTS

3.1 COMPLAINTS SUMMARY

A summary of complaints of an environmental nature related to the discharge(s) to water from the WWTP and network is included below.

Number of Complaints	Nature of Complaint	Number Open Complaints	Number Closed Complaints
There were no relevant environmental complaints in 2024.			

3.2 REPORTED INCIDENTS SUMMARY

Environmental incidents that arise in an agglomeration are reported on an on-going basis in accordance with our waste water discharge licences. Where an incident occurs and it is reportable under the licence, it is reported to the Environmental Protection Agency through their Environmental Data Exchange Network, or in some instances by telephone. Some incidents which arise in the agglomeration are recorded by Uisce Éireann but may not be reportable under our licence for example where the incident does not have an impact on environmental performance.

A summary of reported incidents is included below.

3.2.1 SUMMARY OF INCIDENTS

Incident Type	Cause	Recurring (Y/N)	Closed (Y/N)
Abatement equipment off-line	Plant or equipment breakdown at WWTP	No	Yes
Breach of ELV	Plant or equipment breakdown at WWTP	No	Yes
Uncontrolled release	Emergency overflow caused by power failure	No	Yes

3.2.2 SUMMARY OF OVERALL INCIDENTS

Question	Answer
Number of Incidents in 2024	3
Number of Incidents reported to the EPA via EDEN in 2024	3
Explanation of any discrepancies between the two numbers above	N/A

4 INFRASTRUCTURAL ASSESSMENTS AND PROGRAMME OF IMPROVEMENTS

4.1 STORM WATER OVERFLOW IDENTIFICATION AND INSPECTION REPORT

A summary of the operation of the storm water overflows and their significance where known is included below:

4.1.1 SWO IDENTIFICATION

WWDL Name / Code for Storm Water Overflow (chamber) where applicable	Irish Grid Ref. (outfall)	Included in Schedule of the WWDL	Significance of the overflow(High / Medium / Low)	Assessed against DoEHLG Criteria	No. of times activated in 2024 (No. of events)	Total volume discharged in 2024 (m3)	Monitoring Status
SW002	149129, 178416	Yes	Low Significance	Meeting Criteria	Unknown	Unknown	Not Monitored

The contents presented in this table include the most up to date information available at the time of writing. Any TBC SWO(s) were identified as part of the on-going National SWO programme and will be updated in subsequent AER(s) once the information is confirmed.

SWO Summary	
How much wastewater discharge by metered SWOs during the year (m3)?	Unknown
Is each SWO identified as not meeting DoEHLG Guidance included in the Programme of Improvements?	N/A
The SWO Assessment included the requirements of relevant of WWDL schedules?	Yes
Have the EPA been advised of any additional SWOs / changes to Schedule C3 and A4 under Condition 1.7?	N/A

4.2 REPORT ON PROGRESS MADE AND PROPOSALS BEING DEVELOPED TO MEET THE IMPROVEMENT PROGRAMME REQUIREMENTS.

4.2.1 SPECIFIED IMPROVEMENT PROGRAMME SUMMARY

A wastewater discharge licence may require a number of reports on specific subject areas to be prepared for the agglomeration in question. These reports are submitted to the EPA as part of the Annual Environmental Report. This section provides a list of the various reports required for this agglomeration and a brief summary of their recommendations.

Specified Improvement Programmes (under Schedule A and C of WWDL)	Description	Licence Schedule	Licence Completion Date	Date Expired? (N/NA/Y)	Status of Works	Timeframe for Completing the Work	Comments
There are no Specified Improvement Programmes for this Agglomeration.							

A summary of the status of any other improvements identified by under Condition 5 assessments- is included below.

4.2.2 IMPROVEMENT PROGRAMME SUMMARY

Improvement Identifier	Improvement Description / or any Operational Improvements	Improvement Source	Expected Completion Date	Comments
No additional improvements planned at this time.				

4.2.3 SEWER INTEGRITY RISK ASSESSMENT

The utilisation of multiple capital maintenance programmes and the outputs of the workshops with the Local Authority Operations Staff held under the programme can be used to satisfy the requirements of Condition 5 regarding network integrity. Improvement works identified by way of these programmes and workshops will be included in the Improvements Summary Tables 4.2.1 and 4.2.2.

5 LICENCE SPECIFIC REPORTS

A wastewater discharge licence may require a number of reports on specific subject areas to be prepared for the agglomeration in question. These reports are submitted to the EPA as part of the Annual Environmental Report. This section provides a list of the various reports required for this agglomeration and a brief summary of their recommendations.

Licence Specific Report	Required by licence	Included in this AER
D0320-01-Priority Substances Assessment	Yes	No

6 CERTIFICATION AND SIGN OFF

6.1 SUMMARY OF AER CONTENTS

Parameter	Answer
Does the AER include an Executive Summary?	Yes
Does the AER include an assessment of the performance of the Waste Water Works (i.e. have the results of assessments been interpreted against WWDL requirements and or Environmental Quality Standards)?	Yes
Is there a need to advise the EPA for Consideration of a Technical Amendment/Review of the Licence?	Yes
List reason e.g. additional SWO identified	Additional SWOs
Is there a need to request/advise the EPA of any modification to the existing WWDL with respect to condition 4 changes to monitoring location, frequency etc	N/A
List reason e.g. changes to monitoring requirements	N/A
Have these processes commenced?	No
Are all outstanding reports and assessments from previous AERs included as an appendix to this AER	No

I certify that the information given in this Annual Environmental Report is truthful, accurate and complete:

Signed: Date: 22/05/2025

This AER has been produced by Uisce Éireann's Environmental Information System (EIMS) and has been electronically signed off in that system for and on behalf of ,

Eleanor Roche

Head of Environmental Regulation.

7 APPENDIX

There are no Appendices included