



Dervla Murphy
Commission for Energy Regulation
The Exchange
Belgard Square North
Tallaght
Dublin 24

29th July 2016

Re: Consultation on the Irish Water Performance Assessment

Dear Dervla,

The Environmental Protection Agency (EPA) has reviewed the CER's consultation paper on the Performance Assessment of Irish Water and welcomes the opportunity to provide comments on the key metrics against which Irish Water's performance will be monitored over time. As you are aware, EPA representatives met with the CER on several occasions during the development of this paper and we are pleased to see that our feedback regarding appropriate environmental indicators for both drinking water and waste water has been incorporated into the document. The EPA now wishes to provide further comments as follows:

Environmental Performance

With regard to the Water Framework Directive, when the second cycle of River Basin Management Plans are published in 2017, the CER should consider the inclusion of a new metric to monitor and report on the number of waste water agglomerations identified as pressures and included in a programme of measures for the protection of waters.

Water Supply – Quality of Service

In *Section 5.3 Water Quality*, the CER should consider including a metric regarding the percentage pesticides compliance (similar to the THMs and lead metrics), on the basis that pesticides in drinking water is a priority issue affecting an increasing number of public water supplies.

In *Section 5.4 Water supplies on boil water notice and/or water restrictions*, the current proposal is to use 200 days as the metric for public supplies on a BWN. The EPA considers 30 days to be a more appropriate target, in line with the definition of a trivial non-compliance in the Drinking Water Directive.

I trust these comments will assist the CER in finalising the performance assessment framework. If you would like to discuss any aspect of the above, please don't hesitate to call me on 053 9160600.

Yours sincerely,

A handwritten signature in black ink, appearing to be 'David Flynn', written over a white background.

David Flynn
Programme Manager, Office of Environmental Enforcement