



Irish Rural Link
Nasc Tuaithe na hÉireann

Irish Rural Link Submission to Environmental Protection Agency
ON

**National Inspection Plan 2015-2017
For Domestic Waste Water Treatment Systems**

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1. Introduction

Irish Rural Link welcomes the opportunity to make this submission on a new National Inspection Plan for Domestic Waste Water Treatment Systems 2015-2017 and recognises the committed work of the Environmental Protection Agency and local authorities. The opportunity to contribute is widely welcomed as septic tank inspections are an area of concern for rural residents especially. A large proportion of the 500,000 septic tanks in Ireland currently reside in the rural setting. For many isolated rural households there is no option of a public sewage scheme forcing them to construct personal sewage at significant costs to themselves. The National Inspection Plan for Domestic Waste Water Treatment Systems' aim is to protect human health and water from the risks posed by domestic waste water treatment systems by using a two-strand approach of education and awareness strategies linked with a risk-based inspection process. Given Irish Rural Link's standing with rural communities, IRL have been promoting good practice for domestic waste water treatment system since 2013 and will continue to do so under the new National Inspection Plan for Domestic Waste Water Treatment Systems 2015-2017. As well as the local authorities having a responsibility to effectively inspect domestic waste water treatment systems, homeowners have a duty of care to maintain their septic tank for the safety of other citizens. In this submission, Irish Rural Link hopes to suggest methods of assisting local authorities and households to work together to meet the targets set out by the EPA.

2. Evaluation of previous National Inspection Plan for Domestic Waste Water Treatment Systems.

When evaluating the previous National Inspection Plan for Domestic Waste Water Treatment Systems there is a great deal of aspects to consider such as inspection levels, failure rate, reasons for failure etc. Irish Rural Link wishes to draw attention to how policies around waste water systems are communicated to citizens.

The most important statistic to analyse is that 52% of sites with private wells failed inspection which means 48% passed inspection. As this was the first round of inspections these figures can be considered relevantly successful only if they are improved upon in the upcoming years. 108 local authority inspectors have been appointed by the EPA and have carried out 987 inspections to date. IRL understands that these inspectors have other responsibilities but also believe that when public health is at risk the number of inspections

must increase. The risk to public health cannot be underestimated and must be addressed. 476 septic tanks failed inspection and as a result received advisory notices. Almost 50% of the systems failed inspection due to minor issues such as de-sludging and lack of proper maintenance. After receiving advisory notices, 79% of the inspected systems are now compliant with the regulations. This clearly indicates through proper education and consultation with communities that the failure rate of waste water systems can be greatly reduced. Another interesting aspect to consider is that 79% of the systems that failed were over 50 years old; there is a clear relationship between the age of waste water systems and failure rates. This is no surprise given that the majority of waste water systems have an average lifespan of 30 years. The 2011 Census states that there are 127,961 treatment systems installed pre 1961; many of these systems may need to be replaced as they are well beyond the recommended lifespan (30 years).

Consultation with Householders

As the most common reason for inspection failure is a lack of de-sludging, it would be beneficial for policy efforts to target encouraging householders to maintain their systems. Research has shown that additional capacity for sludge recovery/disposal is needed. IRL proposes to address the high rate of failures and there needs to be a greater co-ordination between homeowners and local authorities. Homeowners should be encouraged to engage positively with their responsibility to their families' health. Research shows that 67% of respondents to a survey of attitudes and awareness said they had not sought information on the operation and maintenance of treatment systems. That being said, local authorities have made a huge effort to consult with homeowners but some of their initiatives have been unsuccessful. 1.7 million leaflets have been distributed to households and 26 local authorities have septic tank information on their websites. Local authorities must continue to look for creative new methods to inform homeowners. Encouragement can be taken from Carlow and Meath County Council who visited homeowners in advance of inspections to deliver the pre-inspection notification letters. This has helped allay the concerns of homeowners and give them an opportunity to prepare for the inspection. In the case of Wexford County Council, they brought a reporter from a local radio station along to an inspection, which was broadcast and followed up with a live radio interview.

Irish Rural Link is encouraged by these case studies undertaken by some local authorities but believe there is room for improvement in consulting with communities. IRL in recent years

were part of the Digital Switchover and are currently involved in the communications of the Eircodes which is to be launched this year. The Digital Switchover campaign reached 96,000 households directly. 26 local champions were enlisted and coordinated with local voluntary organisations to reach these households. The local champion recruited local volunteers to visit their neighbours in an informal fashion and explain to them what the switchover involved. The success of this campaign was that the visits to the households were conducted in an informal manner through the goodwill of local volunteers. By taking away the formal structures, you provide an informal environment where citizens can be honest and express concerns without fear of penalty. This is a model that can be tailored for any information campaign, as stated above the model is being currently used for the Eircodes information campaign. Irish Rural Link believes this model can be replicated to inform people on how to maintain their waste water systems. There is a genuine fear among households about septic tank inspections; this fear was expressed by over 300 people who attended an information evening about septic tank systems.

Grant Scheme

Inspection of septic tanks began around the country by the local authorities and for many rural residents this sparked fear. Many septic tanks have been left in decline since their construction due to a lack of education on maintenance. Many people are living in fear of inspections due to the cost of bringing their tank up to standard. From the initial round of inspections up to 48% of septic tanks failed in some counties. The majority of these were down to minor problems such as de-sludging or lack of maintenance. The tanks with larger structural damage will cost a great deal more to fix for which there is a maximum grant of 4000 euro available. Irish Rural Link is calling for an increase in the level of the grant available aimed at low income families and elderly people. The staging of the grants is also an issue that needs to be addressed. There is currently an 80% grant to a maximum of 4,000 euro for incomes under 50,000 while there is 50% available to a maximum of 2,500 euro for incomes between 50,001 and 75,000. IRL is calling for the grants available to be increasingly staged as families earning just over 50,000 euro could lose up to 30% of the grant available for being relevantly over the limit.

Conclusion

It is clear that there is concern from government, agencies and citizens about the condition of Ireland's waste water treatment systems that needs to be continually investigated in order to protect public health. There is both a responsibility on behalf of local authorities and households to work together to ensure the public's health is protected. 79% of inspected systems older than 50 years failed the inspection; this gives us a clear indication that Ireland must upgrade their waste water systems as there is a large number who has exceeded their 30 year lifespan. Government must address these aging systems to ensure the associated problems do not escalate in the future. Ireland is starting to see the light at the end of the tunnel after the economic crisis. Now that the end is hopefully in sight it is time to address problems that have been placed on the long finger since the start of the crisis. Government and policy makers must put in resources into addressing these issues. Counties such as Clare and Mayo failed to complete their allocated number of inspections with Clare only completing 31% of inspections. These councils have advised the Environmental Protection Agency that their failure to meet their targets was due staffing resources. Councils must be assisted if they are expected to continually meet their allocation.

Taking in isolation the 48% failure rate of septic tanks can be considered worrying but considering that the failure rate is reduced to 21% after the issuing of advisory notes offers relative encouragement. This portrays a clear message that a large number of these failures could have been prevented. Local authorities must continue to work with the EPA and local communities to inform homeowners how to maintain their waste water treatment systems. How best do local authorities inform households? There is no doubt that the Environmental Protection Agency and the local authorities have launched huge information campaigns but these campaigns have had limited success in terms of reducing the failure rate of septic tank inspections. Irish Rural Link believes that the best way to inform households about the best way to maintain their waste water systems is to meet households face to face. This can be done by holding information seminars within the communities and eliminate any fears householders have about inspections. It is also believed that the Digital Switchover model can be replicated to inform citizens about the correct maintenance of septic tanks. Such a campaign takes away the formal consultation of the current information campaign and eliminates any fear of inspections. The current grant scheme for septic tank improvements is inadequate for low income families and elderly people especially. Private septic tanks are essential for many rural residents as they do not have access to the public system, these

citizens must be supported. As a large proportion of private septic tanks have exceeded their 30 year lifespan they will have to be replaced. It is estimated that a new system can cost between 5,000 and 7,000 euro. The current grant system does not cover the whole cost, leaving many people in increased financial hardship and pressure.

If we as a nation truly want to protect public health, we must educate septic tank system owners about its appropriate maintenance and support individuals who need to upgrade their systems.

Irish Rural Link- the Organisation

Irish Rural Link (IRL), formed in 1991, is a national network of organisations and individuals campaigning for sustainable rural development in Ireland and Europe. IRL, a non-profit organisation, has grown significantly since its inception and now directly represents over 300 community groups with a combined membership of 25,000.

The network provides a structure through which rural groups and individuals, representing disadvantaged rural communities, can articulate their common needs and priorities, share their experiences and present their case to policy-makers at local, national and European Level.

Irish Rural Link is the only group represented at the national social partnership talks solely representing rural communities' interests.

'Our vision is of vibrant, inclusive and sustainable rural communities that contribute to an equitable and just society'

Irish Rural Link's aims are:

- To articulate and facilitate the voices of rural communities in local, regional, national and European policy arenas, especially those experiencing poverty, social exclusion and the challenge of change in the 21st century.
- To promote local and community development in rural communities in order to strengthen and build the capacity of rural community groups to act as primary movers through practical assistance and advice.
- To research, critique and disseminate policies relating to rural communities including issues such as sustainability, social exclusion, equality and poverty

'Our mission is to influence and inform local, regional, national and European development policies and programmes in favour of rural communities especially those who are marginalised as a result of poverty and social exclusion in rural areas.'