

Water for Life

We welcome the fact that the issue of water scarcity, climate change, and human interaction with water is being addressed by Government. There are some good initiatives in the paper but we also have many concerns, especially as the Government appears to be handing over responsibility for our current and future access to water to regulators and water companies. We welcome the Government 'being ready to introduce mandatory measures' (3.7) and the acknowledgement that 'significant investments... will be needed' (4.2), but we want to see Government pursuing these claims.

We are concerned that the timescale provided for planned change (2.18) does not seem to reflect the urgency of the situation.

Having stated the problems, the paper's executive message suggests devolution of the solutions but (save for repeating established advice on avoiding waste and saving water) does not give enough guidance about how to solve the problems (as opposed to who should contribute to their solution).

We will be awaiting the new strategic policy statement, the social and environmental guidance for Ofwat, the plans for the new abstraction regime, the social tariff guidance, the guidelines for the next water resources management planning round, the next price review, Ofwat's Abstraction Incentive Mechanism plans, the Government's Anaerobic Digestion strategy, guidance on social tariffs, Ofwat's Future Price Limits, the River Basin Management Plans, the agreed approach to water footprinting, the Future Water Bill and the Water Research Partnerships Progress.

We have set out our responses under the following headings:

- Over-Abstraction and Pollution
- Catchment Approach to Water-ways Management
- Planning and Regulations
- Social Tariffs
- Valuing Water
- Intentions mentioned in the paper but not explained:
- Other observations

Over-Abstraction and Pollution

(1.19) should also consider changing HOW farmers farm.

Adopting more of the principles of organic farming would both reduce over-abstraction and pollution in the agricultural sector. Organic farming has less need for irrigation and reduced or non- use of oil-based fertilisers and chemical pesticides.

We welcome measures by the industry to increase water efficiency in agriculture (6.33) and want to see more support and encouragement for similar initiatives.

The plans for Restoring Sustainable Abstraction seem a bit thin.

The Environment Agency will be working 'with the food industry to develop a shared understanding of future water demand and risks to both the abstractors and the environment' (35), but (2.10) the licensing system seems to put more emphasis on compensation abstractors than protection of the environment.

We regret the decision (2.15) 'not to use the transition (to a new licensing regime) to changed licensed volumes to address current unsustainable abstraction'. Understandably it may be complicated but the issue is rather urgent and could be worth it.

There should be standards for ingredients in cleaning products, fertilisers and pesticides to enable customers to choose products that pollute our waters less.

We believe it would be beneficial to have strict guidelines around dangerous, or simply very common, substances that are poured down the drain (3.20-3.22).

We believe that rural pollution warrants national level interventions from government, in the same way that urban diffuse pollution does. (3.22)

Though we welcome a focus on pollution from diffuse sources (3.4) there is a failure to quantify the goal. For example, it could have committed to introduce restrictions on the chemical composition of detergent. This would also improve and ease the treatment of waste water.

The idea for labelling the water efficiency / water footprint of products, to improve procurement standards (6.22) is very good but the possibility of making it compulsory or standardised should be considered.

Water management plans should not be merely about adaptation, but should and could be about mitigation of the potential effects of climate change on our water supplies by adapting farming methods, and changing business and household behavioural so that do less damage is done the supplies we have. It would be good to see advice on mitigation, as part of the 'message on the need to adapt to climate change, giving abstractors clear signals'.

A Local Council initiative in India gives people who harvest rainwater a reduction in their Council Tax. This could be encouraged in England.

We welcome use of permeable asphalt and support for Sustainable Drainage Systems.

(3.) Plans for 'Environment Agency Improvement Unit Charge... (thus) still enabling abstractors to take the water they need' are not going to encourage the pace and extent of change needed.

On energy related matters, we welcome plans to 'understand the water use associated with CCS technology' (4.13) but are concerned about the lack of consideration given to the "fracking," which was given the go ahead earlier this year.

Fracking requires 8 000 to 40 000 m³ of water to be pumped into the ground for each new fracking well, along with chemical and other pollutants (according to the American group Food and Water Watch). This is left at subterranean levels and not returned to the water cycle.

A factor in the cost of potable water production is for the energy used.

Catchment Approach to Water-ways Management

The catchment approach appears to have some good potential at the local level, but it is very important that the promises of links between neighbouring catchments are realised. Inter- catchment work will be vital for people who own land/businesses that cover more than one catchment, or where there is a geographical overlap (such as with the landscape scale initiatives), to try to keep attitudes and approach holistic. The government should make sure that what is happening at each catchment area is monitored to enable positive interaction between different catchments.

(2.20) An alternative approach in the Water Resource Management Programmes is welcome.

The method of financing the transport of water is important. It must not restrict investment to 'low risk' short distance transportation schemes.

The catchment sensitive farming sounds interesting and agri-environmental payments are good.

(3.13) We do not think that setting a standard timetable for decisions on further regulatory steps is feasible. However, the method of monitoring needs to be formulated and there needs to be a time frame for assessment of progress.

(3.15) It is not clear what would the government consider to be an area of 'high ecosystem potential'.

(4.9) We welcome the acknowledgement of the Water companies 'stewardship role'.

(3.17) We agree that 'availability of funding and incentives for farmers should not be dependent on water companies.

Increasing choice for customers and having properly planned catchment based approach are likely to be mutually exclusive.

(3.25) The Water Framework Directive...'acting to ensure compliance with existing requirements' is a good start but there should be extending and raising of the requirements.

(3.40) There are mentions of a holistic attitude towards our interaction with water, but the majority of the paper is focused on the buying and selling parts of the water cycle, which is a narrow slant. Most of the benefits seem to be business-oriented rather than towards household customers... 'abstractors will be able to make judgements on the relative value of their licenses'.

Planning and Regulations

(4.10) We welcome plans to 'update planning guidance to reflect latest research on how to account for climate change in water resources planning'.

We welcome the promotion of new building standards, but we would like to see quantification of the proposed standards and lament the lack of quantitative statements in the paper as a whole.

(4.19) We support the inclusion of Water efficiency standards for Sustainable Homes and would encourage their extension to all buildings.

We would have liked to see universal water metering regarded as a national priority and not be delegated to the individual water companies, especially as that water metering can be effective at reducing consumption. It can aid in the collection of data about water use, in order to target particularly wasteful areas and raise consumer awareness about water use.

(4.15) We question the decision to allow 'the primary responsibility for water resource planning and providing and effective waste-water system continue to rest with the water companies'.

We welcome plans to 'consider the necessity of strategic national infrastructure projects to ensure supplies remain resilient'.

(4.21) We would support the introduction of a National Policy Statement for Waste Water and strongly encourage the consideration of a National Policy Statement for Water.

(4.27) We support 'work to ensure a more strategic approach to drainage planning' and that 'planning standards are brought up to a consist level of best practise'. To 'encourage the use of SuDS' everywhere is supported. We would welcome national standards for Sustainable Drainage Systems and a new approval system for sustainable drainage including default build standards.

We welcome plans to legislate on Ofwat statutory market codes.

(5.34) Talks about 'reform of existing Water Supply Licensing scheme...no case for the foreseeable future of opening up the household market to competition'... is not reassuring.

(5.35) Could there be complications in regulating who is a non-householder customer when threshold requirements for businesses to enter the WSL market are diminished and then reduced to zero?

We are not convinced of the benefit of extending the Water Supply Licensing scheme to sewerage services, thus encouraging a multiplicity of suppliers.

(5.62) Welcome guaranteed service standards to ensure that 'all customers receive a minimum standard of service' but are concerned that these standards must remain high to avoid a situation where access to high standards of water supply/treatment may only be available if you can afford to pay over the odds for water services, which could negatively affect poor people's health and the health of water sources in poor areas.

We welcome an increase in the use of recycled water. This is something that Government could do more to support.

We welcome plans to design buildings so that they do not use high quality drinking water as the default for all purposes and for retrofitting of Sustainable Drainage Systems. Standards and deadlines for them would be welcome.

We welcome plans to review regulations on standards for amount of water used by key water fittings and appliances.

Welcome plans to 'remove regulatory incentives for water companies to implement traditional piped drainage solutions' but in restricting the incentives, government should take the opportunity to put incentives in place to encourage SuDS.

(6.49) GLD welcomes considerations to elevate 'Ofwat's statutory duty to contribute to the achievement of sustainable development from a secondary to primary duty', providing it is defined as environmentally sustainable development.

Government needs to provide leadership and direction as well as 'greater clarity on the longer term objectives of the sector to provide a coherent framework' (6.44)

Social Tariffs

These seem to be a very reasonable idea, but they need to be more secure than just on a voluntary basis.

(4.10) Government support for approaches that offer good value for customers and the potential to prevent and manage future risks to drinking water quality' is welcome, but that support must extend to availability.

Valuing Water

(6.29) We welcome the move to encourage a 'broader view of water use' and consider embedded water in imports. This broader view must take into account that the whole world's water supplies are facing the same problems as ours.

(7.2) We agreed; 'There must be a new approach to how we value and use water' (7.5). The weather, financial markets and people's behaviour are never easy to predict, especially over the long-term with a changing climate'. Responsibility must be accepted by everyone, including government.

(1.5) warns that 'If we fail to take this challenge seriously we not only risk irreparable damage to our environment, we threaten our economy' to this we believe we must add "and ourselves"! We are not separate from, but depend on, our environment, as does our economy.

(1.6) requires 'support for growth and the wider needs of society'. The economy is not more important than our individual lives. Securing water supplies for now and in the future will enable growth, but surely growth is secondary, a positive by-product, from simply ensuring water supplies - our life line now and in the future.

The ability to share resources is important. Do we want to increase competition over a resource that is increasingly scarce?! Cooperative ownership of water sources, supplies, use and treatment should be encouraged.

Liberalisation could lead to systemic abuses, and there does not seem to be any strong commitment to avoid them.

The papers intention of making water more valued in society has been twisted into the commodification of water, which is not the same thing. It is almost to the contrary. It is

indeed important that ecosystem services are recompensed. However, monetising the cost of its abstraction, use and treatment, makes it into a commodity.

Actual progress towards cutting unsustainable abstraction should not be compromised by measurers that just aim to obtain 'better value'. (3.32) It may not be sustainable enough in the long-term just to 'focus on ... cost-beneficial solutions' and the concept of 'real benefits' must extend further than monetary benefits and should naturally include the benefit of being able to provide sustainable, clean water supplies in the future (3.34). The regulatory framework should have environmental priorities, not just aims to 'encourage cost effective solutions and maintain investor confidence' (5.1)

(4.4) 'The water sector has been attractive to investors because of its stability'. Will making licenses tradable decrease its stability? Will it really create a long term, rather than short term, approach to dealing with water availability? The contradiction between - praise for the sectors low-risk nature as a positive aspect of the sector for investors - and subsequent paragraphs requiring the introduction of more risk-taking (5.27) in the water sector - raises concern on more than one level. Besides changing the appearance and functioning of the sector and possibly losing some current investors, concerns over increasingly exposing this sector to the effects of short-term and speculative investors is frankly terrifying. In 2.20 water's availability is referred to as 'the lifetime of the assets'.

The idea of water abstraction licence trading is a bad one – making ability to pay rather than contribution to society the criterion which decides allocations, for example, to golf courses and market gardens.

The potential of trading water on an open market with brokers...could encourage speculation on future water availability/prices and severely increases risk for investors and customers and encourages society to look towards water with a view, first and foremost, to making profit out of it, and making a quick profit too- this does not provide for a long-term, stable water sector. It is not moral to make money out of what gives us life. Real investment in water should aim to gain dividends in clean water, not money.

Many of the disastrous effects of treating food as a commodity are already clear. Apart from the likely increase in conflict this will lead to over a resource that is already being labelled as blue gold, it has potential to increase the price of water for everyone rather than decrease it and does not increase access to it or its availability. It seems to be a very irresponsible approach to dealing with scarcity of something so vital to life. The UN has declared the Right to Water to be a human right.

It is clear that innovation is needed but competition is not necessary for innovation. A belief in change and commitment to action is needed for change and innovation. A shared intention is even better and the catchment system could work well in this respect. This is something the government should encourage the Environment Agency and Ofwat to do.

Would recommend changing 'want' to 'need' in 5.4: 'it is essential that the regulatory regime incentivises companies to ...only invest in measures that are needed to deliver the secure and sustainable supplies that customers want.'

There still seems to be the idea that the environment is separate from us. 'Poor quality water is a social issue, not just an environmental one' (6.12). Environmental issues are social issues and economic issues. They are all encompassing, like the environment.

Intentions mentioned in the paper but not explained:

27 – Give water companies better incentives and tools to manage their abstraction sustainably.

37 – Puts consumers at the heart of decision-making in the water sector.... It puts water companies at the heart of decision-making, with the potential to consult with 'stakeholders' in their catchment areas. People who turn up to local consultations do not represent all 'those with a clear stake in their local environment'. Everyone alive now (not to mention those in the future) has a clear stake!

'1.28 to create an innovative, efficient, customer focused water sector'...is part of the aim, but it is not adequately addressed.

'2.12 clear signals and regulatory certainty on the availability of water'...are not obvious.

'2.15 we intend to have a new schemes to provide stronger protection for the environment when water is scarce'...how? If it provides more protection for the environment it is likely to cost more for water companies, government, or customers.

'2.19 tackling supply deficits within individual catchments will be a high cost approach'....but necessary...?

'3.7 safeguarding those water bodies that provide the greatest range of public benefits'... what criteria are to be met?

'3.10 building on the evidence base will help companies in engaging with customers when seeking support for catchment schemes'... which sorts of customers and how might they been engaged?

3.12 How will the government choose the 25 pilots they will give support to?

'3.22 building on current cross-organisation working to manage local flood risks'...more details please?

'3.24 from 2015, more stringent bathing water standards'...don't put it off.

4.14 National Infrastructure Plan...

'5.27 We believe there are gains to be had from increased competition'... What about gains in environmental protection? 'Strengthen the sectors ability to respond to the challenges of the future and improve the deal it offers to its customers'... business and public sector only or household customers?... 'right for new entrants to negotiate discounts for non-householder customers that reduce pressure on networks' (5.42).

5.32 'domestic customers may benefit'...MAY? 'offering a range of tariffs and service packages should become part of their core business'...really? So some people could have better treated water if they pay more?

5.33 the sector 'must remain able to deliver key government objectives on future resilience and support for customers to improve their water efficiency and tackle affordability'...just remain able or actually take action. Why doesn't the government do something to ensure it?

'5.56 Ofwat – modernising licenses...to ensure better standards of service for housing developers and landowners. Once licenses are standardised, legislation should be amended to enable changes to the licence to be agreed by a qualified majority of companies'...should it? Allow businesses to regulate their own licenses? 'Introduce a self-supply licence' (5.43)

Plans for the Future Water Bill such as to remove costs principle

Plans to affect the Consumer Council for Water. (5.60)

'6.40 Water UK – updated set of commitments to build on the government's policy direction' which is...?

Other observations

One principle seems to be lacking - Planning for the future: the need to locate development where there is water, rather than allocating development and then trying to sort out a water supply. This includes measures to tackle the population drift from the better watered north to the drought prone South East, London and East of England Regions.

We would have liked to see a commitment to make leakage targets binding for companies, considering that British leakage rate is about 30% whereas in countries like Singapore (or even France) it is never over 10%.

We would like to raise concerns about the wasteful nature of the Thames Tunnel, which could bring disruption to London, and seems to favour centralised collection over a more lightweight and distributed water treatment strategy (already exemplified by the Olympic park case study).

The white paper almost exclusively focuses on surface water. There is no notable mention of any intervention to safeguard or improve the state of aquifers. If over abstraction leads to damage of ecosystems, the volume of water itself can be easily and quickly restored. However, aquifers are replenished much more slowly, and thus can be more easily damaged by over abstraction. There seems to be no mention of wells and the possible decrease of the water table.

Chapter 6 provides very little new insight into the situation, apart from the promises of the Green Deal, and seems to provide few incentives to reduce water consumption.