

Waterwise response to Environment Agency Consultation on identifying areas of water stress

April 2007

1. Do you agree that some water efficiency activity is appropriate everywhere throughout England?

Waterwise wholeheartedly agrees that water efficiency activity is appropriate everywhere throughout England. Areas not identified as water-stressed now may well have problems with their supply-demand balance in future years: some of the most recent UK droughts have been in areas not conventionally considered water-stressed, such as Dundee, Yorkshire, and the Lake District. Importantly, the carbon footprint not only of treating and pumping water to homes, but also of heating water within homes, exists across the country, regardless of the level of water stress. The environmental impacts of abstracting water also range across England, regardless of the supply-demand balance in any particular area or region, and genuine sustainable development requires resource efficiency across the board on economic, social and environmental grounds – as Ian Pearson states in the foreword to Defra’s parallel consultation on water metering in areas of serious water stress, “water is a natural resource that we must all value”. Waterwise believes in any case that water efficiency is cost efficient in terms of expenditure on water-saving measures and value of litres of water saved (and we are currently developing the evidence base, with data produced by the UK water companies, to support this). Finally, the market in water efficient fixtures, fittings and white goods is national, not regional, a point explicitly made in the government’s recent consultation on water efficiency in new homes and buildings as explanation for the proposal there of national, rather than regional, regulation: in fact, for most of the manufacturers of bathroom products and white goods, the market is not just national but global.

2. What do you think of the principle that water efficiency measures should be in proportion to the relative degree of water stress?

Waterwise certainly agrees that the highest levels of water efficiency activities should take place in the areas of serious water stress. As stated in our response to question 1, above, Waterwise believes that a baseline level of water efficiency should take place across the country, and that even the areas defined as having the lowest level of water stress (such as Northumbrian Water) should move to full metering to enable the management of peak demand. In the most water-stressed areas, water efficiency measures should include not only metering but also the fitting of water efficient devices in new and existing homes, work with retailers and manufacturers to regulate for and incentivise this, and targeted information to shape behaviour.

3. What is the right size of area for the classification of water stress?

Waterwise agrees with the Agency's approach of defining areas of water stress by water company area, as it would be a disproportionately complex exercise to define them on smaller areas. However, water companies themselves should retain the flexibility to take measures forward in subsets of their own areas, as the Agency proposes.

4. Do you agree that classifying water stress according to three levels is the right approach?

Waterwise agrees with this approach.

5. Currently we are using Serious, Moderate and Low. What names do you think we should use to describe the levels of water stress in England?

Waterwise supports the use of Serious, Moderate and Low – but believe it is important that the scores themselves are regularly revisited, as the Agency proposes: every five years and tied in with price review timetables.

6. Can you suggest improvements to this approach for scoring and classifying water companies?

Waterwise supports the Agency's methodology. An important part of the methodology is the Agency's proposal to revisit the scores every five years, tying in with price review timetables: this is crucial to the identification of areas of water stress remaining relevant and useful.

7. Do you agree that the results of this approach effectively identify the areas of water stress in England?

8.
Yes.

To be read in conjunction with Waterwise response to Defra Consultation on water metering in areas of serious water stress, April 2007

Waterwise is an independent, not for profit, non-governmental organisation focused on decreasing water consumption in the UK by 2010 and building the evidence base for large scale water efficiency. In England, we sit on the UK Environment Minister's Water Saving Group alongside the water industry and regulators.

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