

WORSHIPFUL COMPANY OF WATER CONSERVATORS

ANSWERS TO THE PRESCRIBED QUESTIONS IN THE DEFRA CONSULTATION ON ENVIRONMENTAL TARGETS WITH PARTICULAR REFERENCE TO PHOSPHATE IN SEWAGE EFFLUENTS AND WATER DEMAND (16 March 2022)

Overall Response

The Company agrees with the ambition to reduce the impact of phosphate in sewage effluent and water abstractions on the water environment, but that the approaches are overly simplistic and may waste resources in terms of what is needed to provide the right balance of protection and use of environmental waters. The proposals lack the ability to reflect local needs properly. The Company submits that a lot more work is needed before the final targets are set. It also submits that the time has come when environmental aspirations will be better met by public engagement in delivery as well as setting demands. Much more attention is needed on a wide range of matters which are within the responsibility of government.

The range of views of the Company is set out in response to each question, but the Position Statement provides a wealth of commentary from the experiences of Company members.

Phosphate in sewage effluent

Questions:

- **The target needs to allow flexibility for water companies to use best available strategies to reduce phosphorus pollution, including the use of nature-based and catchment-based solutions. Do you agree or disagree that the proposed target provides this flexibility? [Disagree]**
- **[If disagree] What reasons can you provide for why the target doesn't give this flexibility?**

The Company does not disagree *per se*, but the question does not allow for an answer to a question which the Company believes more appropriate. The essence of an answer should be to a question - is the target being set appropriate? The Company submits that it's too blunt an instrument. The aim should be to identify those local waters which require additional removal of phosphate. The Company submits that setting targets must ensure that the uses of rivers and abundant biodiversity and costs are kept in balance. The Company is not convinced that carrying on the current system of quality classification is fit for purpose and in the accompanying Position Statement sets out some suggestions for an alternative strategic approach, and suggests that a review is needed currently. Managing phosphate must be a subset of the execution of this strategy. A Framework and Road Map is needed urgently.

Where phosphate removal from sewage effluent discharges is justified, it will then be a matter of appropriate choice by the Water Company within the regulatory envelope set by Ofwat. The Company favours nature-based solutions, wherever possible, and that embraces the use of biosolids. Phosphate removal must be set into a broad context. Waste water phosphate is a valuable resource which needs conserving and reusing.

Questions:

- **Do you agree or disagree with the level of ambition proposed for the nutrient targets? [Disagree]**
- **[If disagree] What reasons can you provide for why government should consider a different level of ambition?**

The accompanying Position Statement elaborates on the Company's submission. This includes some innovative thinking on the reduction of phosphate discharged to sewage, including reductions in dietary phosphate.

Water Demand

Questions:

- **Do you agree or disagree with the level of ambition proposed for a water demand target? [Disagree]**

The Company does not disagree *per se*, but the question does not allow for an answer to a question which the Company believes more appropriate. The essence of an answer should be to a question is the target being set appropriate? The Company submits that it's too blunt an instrument. The aim should be to identify those local waters which require additional care of available resources. The Company submits that setting targets must ensure that the uses of rivers and abundant biodiversity and costs are kept in balance. The Company is not convinced that carrying on the current system of quality classification is fit for purpose and in the accompanying Position Statement sets out some suggestions for an alternative strategic approach and suggests that a review is needed currently

- **[If disagree] What reasons can you provide for why government should consider a different level of ambition**

The proposals sit in isolation without proper reference to all of the contingent issues ranging from the impact of current planning practices, through the practicalities of delivering and then operating a practical programme of mains replacement or rehabilitation, and the search for new water sources. These are set out in detail in the Position Statement. The Consultation Document does not demonstrate how this Plan will fit in with all the other plans for water management, and it does not demonstrate that the time has come to recognise that the delivery of the overall aspirations cannot be delivered by water companies alone.

Peter Hall
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The Worshipful Company of Water Conservators

11 May 2022