

**WORSHIPFUL COMPANY OF WATER CONSERVATORS  
RESPONSE TO THE PUBLIC INVITATION BY THE CONSUMER COUNCIL FOR  
WATER TO COMMENT ON ITS DRAFT STRATEGY FOR 2023-24**

**31 JANUARY 2023**

1 This response is produced by the Worshipful Company of Water Conservators, the City of London Livery Company, focussed on the long-term health of our water resources and the broader environment. Our members include senior professionals from the water, environmental and related sectors and regulators, along with others who share our passion for water and the environment. Our experience and knowledge range from the complexities of environmental sciences, through the application of engineering to deliver the goals identified by those sciences, and the subsequent management of the assets created. The Company's purpose is *Promoting a diverse and sustainable environment*

2 To avoid confusion between the use of the term Company and water companies, the acronym WCWC is used for the Company.

**Summary**

3 The WCWC focusses on the section dealing with people and the environment. It

- Supports the aspirations of CCW and it suggests that:
  - there needs to be recognition that customers' behaviours should be supported by enabling legislation
  - there needs to be a strengthening of the Approved Plumbers schemes
  - any awareness campaigns should include matters such as coping with leakage in customers' properties and embrace wastewater management, including the disposal of used sanitary products and wet wipes
  - there may be a need for a SewageSafe scheme analogous to WaterSafe
- Suggests there needs to be a significant review of customer communications strategy
- Offers to engage in a dialogue with CCW

**Contribution of the WCWC to the national discussion on water conservation**

4 During 2022, water conservation became a matter of debate in the media and in politics. In addition as part of routine business, Defra issued several consultation documents on matters related to water conservation and the WCWC has responded (these responses may be found on its website). This response forms part of the continuing desire of the WCWC to share the wisdom and experience of its members and to contribute to, and indeed promote, productive dialogue based on evidence. A number of its Members have already contributed to the work of the CCW and it is the WCWC's privilege to contribute further to this.

## **The WCWC response to the Section of the Strategy dealing with People and the Environment**

5 The WCWC shares the aspirations set out in the strategy, but in this case focusses on the section 'People and the Environment' in which you declare that you will *'Increase awareness of the value of water and how people's behaviour affects the water environment to 70% by 2030 through a series of initiatives. If we have a dry winter, we will launch a campaign to help people, businesses, and communities reduce their water use in order to ease pressure on water resources in 2023'. 'This improved understanding is key to measurable behaviour change in the form of lower consumption and less sewer misuse'*

6 As a general point, the WCWC is aware that the remit of CCW is for consumers, not just customers, and it wonders how far CCW needs to go in extending its 'helping hand' to domestic consumers outside of public services, such as those with private water supplies and sewage treatment. The relevant regulators being local authorities and the Environment Agency respectively. Private abstractions can have impact on local water resources and of course, discharges from private treatment facilities can affect local environments. Such consumers do not have the support even of a water company, and whilst they are a minority, nevertheless, any awareness programmes must be as inclusive as possible.

7 It is a platitude to say that we all affect the environment and the environment affects us all. But a consistent theme in the WCWC responses during 2022 was that we all, as individuals, have a role to play in abating and mitigating our personal impact on the environment. The WCWC termed this 'Citizen Delivery' to sit alongside Citizen Science. The WCWC suggests that the delivery of the environmental targets, such as reduced water demand, cannot be obtained just by the corporate deliverers, be they public or private.

8 The question arises as to how social behaviour is changed; do we all just rely on water companies to change customer habits, such as how used sanitary products are disposed of? Their 'bag it and bin it' campaigns for example, would benefit from allied initiatives. (See the WCWC response on wet wipes on the Company website). The WCWC supports the CCW in trying to play a role in changing habits, at least on water consumption, but hopefully more.

### **Enabling legislation**

9 The WCWC observes that whilst personal choice is at the heart of democracy, choices must be made based on simple, clear, memorable advice, and often regulation is needed to support that choice. A good example is the Defra proposal on water efficiency labelling which the WCWC supports (see the WCWC website), and by analogy, the WCWC has suggested that the labelling of sanitary products needs reforming. With so many initiatives at the moment, which impinge on the interface of customer behaviour, water companies and the retail and service sectors, the WCWC suggests that it is time to look at the working of the legislation in this area in general and CCW might wish to consider this as part of its Strategy. As an aside the WCWC have suggested that the reduction of the use of phosphates in food processing would help with the reduction of phosphate in sewage effluent

10 Is it time to be promoting a more formal system of approvals for plumbers? In this context, the WCWC is aware of the valuable contribution of WaterSafe the Water Industry Approved Plumbers Scheme provided by Water Regs UK and of the accreditation scheme of

the Chartered Institute of Plumbing and Heating Engineers. This will be especially valuable in helping to ensure that consumers are not at risk from contamination of water arising from backflow and cross connections. The effective functioning of the Water Fittings Regulations 1999 is essential also to avoid 'in property' leakage.

11 The WCWC is aware of the initiatives by Waterwise in its UK Water Efficiency Strategy and is confident that Waterwise and the CCW will be working together.

12 The WCWC notes that there is an increasing awareness of leakage from customers pipes within the curtilage of their properties and it suggests that the CCW programme should address this problem. It also suggests that the CCW considers the potential that smart domestic water metering has for identifying such leakage.

### **Including waste water management**

13 The WCWC suggests the initiatives to raise awareness of the value of water and how customers' behaviour affects the environment must not only focus on water consumption but also waste water disposal. It can therefore, for example, play a role in the 'bag it and bin it' awareness campaigns.

14 In para 10, the WCWC refers to WaterSafe. Some years ago, a suggestion was made for a Sewage Safe Scheme to British Water to bring consistency of high standards to the provision and maintenance of private sewage systems. This proposal has never flourished, but the CCW might consider how the principles underlying this might be brought into its awareness campaigns.

15 The WCWC asks the question whether, with the focus on the disposal of surface water and the government's intention to introduce Schedule 3 of the 2010 Water and Floods Management Act, CCW can play a useful role with customers beyond just the focus on flooding? For example, in discouraging the flushing of wet wipes and sanitary products down toilets, and could include ongoing advice not to create impervious surfaces, such as driveways and forecourts, and to avoid connection of rain water to foul water drains.

### **Communication**

16 The key question that everyone struggles with is how to communicate with customers. The experience of our members is that such messages need to be repeated many times. Water services suffer from the same challenges as, say, energy use or domestic waste recycling. Are billing leaflets right, or are websites enough or even television advertising? Can social media offer new avenues? How should all of the helpful initiatives be co-ordinated and made more accessible? The whole topic of effective communications should be and is no doubt, key in the 2023-24 strategy. Could CCW promote a government initiative that would bring together all these points, so relevant to protection of our environment and climate change, in say an annual bulletin posted or emailed to every home?

### **An offer of help**

17 Finally, the WCWC would be very pleased to strengthen its relationship with the CCW; it has a lot of experience to offer and it looks forward to opening a dialogue on these matters. To do so please contact the Clerk, Christine Duthie on [clerk@waterconservators.org](mailto:clerk@waterconservators.org).