

**WORSHIPFUL COMPANY OF WATER CONSERVATORS**  
**BRIEFING ON THE RESPONSE TO THE ENVIRONMENT AGENCY CHARGES**  
**CONSULTATION:**  
**WATER INDUSTRY ENFORCEMENT LEVY**

**MAY 2025**

**PROLOGUE**

1 The Worshipful Company of Water Conservators ('WCWC') is a 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 water, environmental and related industries and regulators, along with others who share our concern for water and the environment. Our experience and knowledge ranges 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 WCWC's purpose is *promoting a diverse and sustainable environment*.

2 As part of that purpose, the WCWC has been responding to relevant consultations particularly on matters relating to water conservation. These are archived on its website over the last three years.

<https://waterconservators.org/policies-and-practices/>

**What the EA is consulting on**

3 Following the introduction of the Water (Special Measures) Act 2025 for water discharges, the Environment Agency, EA, proposes introducing a new levy that covers the cost of its water enforcement activities. *The proposed levy will help to fund an improved approach to regulating the quality of water in the natural environment by resourcing its enforcement activity of the water industry.*

[Environment Agency external corporate report template](#)

**SUMMARY OF THE RESPONSE**

4 The WCWC agrees in principle, that the EA needs to be adequately funded to carry out its duties of permitting and enforcement for the Water Industry.

5 But the proposals are discriminatory against the water sector, partial in application and unnecessarily complicated. There is no practical reason to create a parallel set of rules for the collection of a separate levy. Provisions already exist for additional income to be generated by an amended Annual Charges Scheme. The proposals complicate matters with a number of exceptions and commentary on matters, such as Company gearing, when there is an established framework.

6 The WCWC suggests that these proposals are recast as amendments to the existing scheme.

7 The proposals show no sign of an overall strategy for EA funding to deliver compliance with the requirements of the Water Framework Directive Regulations or whatever succeeds them. There is no hint of other mechanisms, within a proper business case, about how other users and polluters will contribute to EA resources. **Could there be a Highway Drainage Levy? The WCWC suggests that Defra should start work on a more structured approach to the funding of resources by users and polluters, including government itself.**

8 The full response is archived on the Company website .