WORSHIPFUL COMPANY OF WATER CONSERVATORS
BRIEFING ON THE RESPONSE TO THE CALL FOR EVIDENCE FROM ENVIRONMENT AUDIT COMMITTEE IN ITS INQUIRY INTO PFAS

MAY 2025

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/

PROLOGUE

3 The Environmental Audit Committee (EAC) will be considering Perfluoroalkyl and Polyfluoroalkyl Substances (PFAS), a family of more than 14,000 man-made chemicals with useful properties such as being resistant to heat, water, oil and grease. The Committee Members will be considering whether enough is being done to understand fully the risks of PFAS in the UK and whether research institutions and the Environment Agency are equipped to monitor their impact .The Committee will also examine the UK's regulatory framework for the use and disposal of PFAS, and will be asking whether UK registration, evaluation, authorisation and restriction of chemicals is adequate. The inquiry will also compare the UK approach to other jurisdictions around the world, such as the European Union and the United States of America.

Addressing the risks from Perfluoroalkyl and Polyfluoroalkyl Substances (PFAS) - Committees - UK Parliament

SUMMARY

4 The WCWC cannot offer any insight into the toxicology of PFAS. It does recognise the concerns being expressed about their presence in the environment, and in particular, the consequences for human health.

5 PFAS are present and will be in the water environment as:

- as legacy contaminants
- being added now from legacy products, via wastewater streams
- arising from future uses

Compliance with environmental goals, (including drinking water quality), might be achieved by significant investments by the water companies to deal with legacy issues and the consequences of uses of PFAS exempted in future from any bans. If it is found that there are advantages in maintaining the uses of certain critical products for the wider community and that causes the need for expensive water treatment processes, there is a circularity in the argument that society benefits from those substances so it must pay to avoid consequences.

6 The WCWC supports the initiative of the Inquiry to look at regulatory systems. Once more, the approach to the problem, as in other environmental problems, is complex and often difficult to unravel. The WCWC urges close co-operation by the UK with the EU on regulation and research, not only to benefit from a wider effort but also to recognise the implications for future trading. Thus, it supports as much effort as possible into coordinated research to provide the evidence for action. And it supports the initiative for a Europe wide ban certainly on the production and uses of non-critical PFAS as a minimum.

7 The WCWC highlights the 2023 Defra Plan for Water, and its focus on PFAS. This recognises that almost all of the failures of chemical status under the Water Directive Regulations of 2017 are caused by uBPT substances (ubiquitous, bioaccumulative , persistent, toxic), mostly PFAS. The EA response to the Plan gives some insight, where around 35-40 years may be needed to a partial achieve resolution of the PFAS problem. Dealing with PFAS, other than PFOS, PFOA and PBDE, may prove to more intractable. So, four points arise:

- How do PFAS get into the water environment other than sewage effluent and what is their contribution to WFD chemical status failure?
- PFAS get into sewage from diffuse sources and from point sources. Consideration needs to be given to how PFAS can be regulated by water companies in trade effluent consents and how the ‘polluter pays principle ‘ applies.
- The media and political coverage can conflate issues; the zero chemical status issue was woven together with concerns about storm overflows from sewers to create images of rivers polluted with ‘chemical cocktails’ from sewage. There needs to be two formal metrics on chemical status of rivers with and without uBPTs.
- There needs to be an urgent update of the Water Plan. The WCWC has advocated an overarching water use strategy which would embrace a PFAS action plan, where and progress should be reported annually.

8 The full response is filed on the company website under Policy Positions