

THE WORSHIPFUL COMPANY OF WATER CONSERVATORS
BRIEFING ON THE RESPONSE TO THE OFWAT CONSULTATION ON
ENVIRONMENTAL PERFORMANCE METHODOLOGY

DECEMBER 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 Ofwat annual performance reporting metrics for water companies includes

- total pollution incidents.
- serious pollution incidents; and
- discharge permit compliance.

This consultation invited views on proposed changes by Ofwat following updates to the Environmental Performance Assessment (EPA) methodology used by the Environment Agency and Natural Resources Wales (the Environmental Regulators).

<https://www.ofwat.gov.uk/consultation/consultation-on-changes-to-three-pr24-environmental-performance-commitments/>

4 As set out in the PR24 final determinations by Ofwat, these common performance commitments reference version 11 of the EPA methodology which was released in February 2024. The Environmental Regulators published an updated EPA methodology (version A) on 15 October 2025.

[Environment Agency Environmental Performance Assessment methodology version A - Ofwat](#)

5 This consultation explains how Ofwat has considered resetting relevant aspects of the affected performance commitments, to take account of updates to the EPA methodology and WIRI guidance.

SUMMARY

6 The WCWC drew attention to other initiatives by Defra and the Environment Agency which are relevant to the notions of compliance with permits. It suggested that since the

commitment to amend preceded other changes, including any arising from implementation of the recommendations of the Independent Commission on Water, these changes should be suspended.

7 The purpose of compliance metrics must not only be to provide published data but also to stimulate action at the highest corporate levels. There are many reasons why the data may include events beyond the control of water companies (as described in the Submission on penalties). What is most important is the action taken by the EA through legal processes and that must be compelling information driving actions at board levels. The WCWC submitted that number of successful legal actions is a much more useful metric. It also suggested that that set of metrics should be included in an EA compliance Code of Practice and a revised Defra integrated water Regulatory Position Statement, as set out in its response to the consultation on penalties for water companies.

<https://waterconservators.org/wp-content/uploads/filr/4043/NOV-25-REGULATION-Response-to-Defra-consultation-on-Water-Company-penalties.pdf>

8 Even with these caveats, the WCWC suggested that it would have been helpful to see the full set of compliance metrics rather than just the amendments and the WCWC provided detailed comments on the proposals. For example, suggesting that the change on reporting periods for treated sewage effluents will make comparisons more difficult and querying the reference to water works discharges.