



Incorporated by Royal Charter 2005

## **WORSHIPFUL COMPANY OF WATER CONSERVATORS**

*Promoting a diverse and sustainable environment*

### **THE PROBLEM OF PFAS IN THE WATER CYCLE**

#### **RESPONSE TO THE HSE CONSULTATION ON RESTRICTIONS OF PFAS IN FIREFIGHTING FOAMS**

<https://consultations.hse.gov.uk/crd-reach/pfas-in-firefighting-foam-fff-restriction-proposal/>

#### **BRIEFING ON THE RESPONSE TO THE DEFRA 2026 PFAS ACTION PLAN**

<https://defraenvironment.blog.gov.uk/2026/02/03/forever-chemicals-the-problem-and-our-plan/>

<https://www.gov.uk/government/publications/pfas-plan/pfas-plan-building-a-safer-future-together>

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### **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. It has responded to the consultation and commented on the Plan

3 The WCWC is very much aware of the impacts of PFAS on human health and the environment and that the water environment is a major vector of the spread of these substances. In fact, the Defra blog on the Plan features a photo of a river. It has, therefore,

contributed to the ongoing dialogue; it contributed to the EAC Call for Evidence; it produced a major Thinkpiece on bioresources, including the impact of PFAS on their uses and has produced an overview of its contributions in 2025.

<https://waterconservators.org/wp-content/uploads/filr/4194/JAN-26-OVERVIEW-of-consultations-and-thinkpieces-in-2025.pdf>

4 The overview contains a section dedicated to PFAS, which has specific hyperlinks to WCWC papers and relevant references and for ease of reference this is reproduced in Appendix 1. This included a reference to the HSE consultation on the proposed ban. It sets out the broad perspective and made some specific suggestions which are relevant to the Consultation and Action Plan. The summary stated that water companies face disproportionate criticism for a problem driven by product use. WCWC calls for:

- Faster restrictions
- National strategy integration
- Better modelling
- Polluter-pays enforcement

And elsewhere it calls for government to take a clearer leadership role in communicating the issues and in changing societal habits, as part of a wider point about the role of government itself in water management.

5 It supports the proposed ban on PFAS in fire- fighting foams.

6 The WCWC observes, once more that there is a complex web of initiatives which are not well connected. Clarity and simplicity are essential. the Action Plan must be part of English water strategy. The Action Plan provides a complex set of initiatives, but several are missing, for example, the plan to tackle zero chemical status of rivers.

9 Once more the practical regulatory steps seem to be focussed on water companies and what is needed is swifter regulatory action on use. Care must be exercised on the clarity of compliance with new criteria. The Plan must fit in with whatever emerges from the White Paper on the future of water; the WCWC makes some suggestions. The issue of PFAS is not considered in the White Paper. But the White Paper does propose a central water quality steering group in the new water regulator .The WCWC will make a number of suggestions for changes in the proposals in the White Paper including the creation of a central Common Standards Unit bring together the proposal for this steering group, the UKTAG and the Standing Committee of Analysts to provide a holistic and consistent approach to standards and monitoring. Appendix 2 sets out some of the questions which the WCWC will address in its response to the White Paper

10 One clear step which could be implemented quickly is consideration of how PFAS can be regulated by water companies in trade effluent consents and how the 'polluter pays principle' applies. Part of government intervention could be to prescribe PFAS in the Environmental Protection (Prescribed Processes and Substances) Regulations 1991. This will have to be led by Defra.