



# Salmon & Trout Association

Fighting for the future of game angling

Patron: HRH The Prince of Wales

President: The Duke of Northumberland

Consultation on Guidance to Ofwat  
Water Supply and Regulation Division  
Department for Environment, Food and Rural Affairs  
2C Ergon House  
Horseferry Road  
London, SW1P 2AL

Dear Guidance to Ofwat Consultation Team,

Thank you for giving the Salmon & Trout Association the opportunity to respond to the consultation of the 'Statutory Social and Environmental Guidance to Ofwat'.

The Salmon & Trout Association (S&TA), which was recently awarded charitable status due to our work concerning fish stock management and aquatic conservation, has over 100,000 individual and club members. We represent the public interest over issues relevant to the management and conservation of water, the aquatic environment and all its dependent species.

The S&TA supports the response from Wildlife and Countryside LINK, but would like to reiterate a few key points. We support the strong emphasis in this guidance encouraging Water Companies to contribute further towards sustainable development and environmental statutory drivers. We feel the guidance is very positive in encouraging Water Companies to move away from 'end of pipe' solutions, to more sustainable landscape based management. Landscape based projects have the ability to deliver many environmental targets for biodiversity, whilst improving and protecting water quality from source. This type of management is also cost effective and would also help Water Companies achieve carbon reduction targets, by reducing the need for expensive and energy-consuming remedy treatments. Water Companies should be encouraged and supported by Ofwat to work with other stakeholders to address environmental objectives associated with achieving the Water Framework Directive (WFD).

We feel there is still a need to educate the general public, that water is not an infinite product, but a service, produced with an environmental cost. The S&TA strongly supports universal water metering, as a way of producing incentives for consumers to reduce demand, but feel the current 2030 target is very unambitious, and may be too little, too late. We would prefer a target of 120 litres per head per day by 2020.

Finally, we are concerned that this guidance will not be adequately integrated into the PR09 process, and subsequently into the current draft business plans. We seek confirmation as to how Defra will ensure this guidance is acted upon.