



Salmon & Trout Association

Fighting for the future of game angling

Patron: HRH The Prince of Wales

President: The Duke of Northumberland

All Party Parliamentary Water Group Inquiry
PO Box 3380
London
SW1P 4WJ

January 2008

Dear Rt Hon Elliot Morley MP,

Thank you for giving the Salmon & Trout Association (S&TA) the opportunity to respond to the Inquiry on the Future of the UK Water Sector.

The S&TA is an international organisation representing the interests of 100,000 individual and club-based game anglers, fishery owners, managers and affiliated trades throughout the United Kingdom. We are especially concerned with promoting and communicating the environmental, social and economic benefits of game angling and fisheries management.

We feel the fact the aquatic environment and its future sustainability was not mentioned at all in this inquiry is very worrying. Water quantity and quality is becoming an increasingly important issue throughout the UK, with increasing human populations and the impacts of climate change. The growing pressure on our water resources heightens the need to ensure sustainable abstractions and a dramatic reduction in point and diffuse water pollution now, in order to protect our aquatic ecosystems and associated wildlife.

Preserving and restoring the aquatic environment will increase biodiversity and bring economic benefits through recreational activities, such as angling and water sports. Managing water pollution from its source, rather than relying on treatment remedies would economically benefit water companies, as improved water quality would reduce the cost of treatment. This however, requires the support of water companies to achieve long term environmentally sustainable management solutions.

The Water Framework Directive (WFD) requires 'good ecological status/potential' to be reached in all our waterbodies by 2015, or we face possible infringement from the EU. In order to achieve these ecological objectives requires the cooperation and support from all the major stakeholders in the water environment, including the water industry.

We would also like to take this opportunity to reiterate some of the requests in the Blueprint for Water, produced by a coalition of fisheries and conservation NGO's including S&TA, appealing for the water industry to work with the government to help ensure sustainable water by 2015, by ensuring to;

- **Waste less water:** reduce water consumption by at least 20% through more efficient use in homes, building and businesses.
- **Keep our rivers flowing and wetland wet:** Amend or revoke those water abstractions licences that damage rivers, lakes and wetlands
- **Price water fairly:** Make household water bills reflect the amount of water people use
- **Make polluters pay:** Ensure those who damage the water environment bear the costs through more effective law enforcement and tougher penalties.
- **Stop pollutants contaminating our water:** Introduce targeted regulations to reduce harmful pollutants in water



Salmon & Trout Association

Fighting for the future of game angling

Patron: HRH The Prince of Wales

President: The Duke of Northumberland

- **Keep sewage out of homes and rivers, and off beaches:** Upgrade the sewage system to reduce discharges of sewage into urban environments and ecologically sensitive areas.
- **Support water-friendly farming:** Help farmers to prevent pollution and restore degraded soils, rivers and wetlands through advice, training and payments
- **Clean up drainage from roads and building:** Construct modern drainage systems that prevent pollution entering rivers from roads and building
- **Restore rivers from source to sea:** Regenerate rivers, lakes and wetlands in partnership with local communities
- **Retain water on floodplains and wetlands:** Restore large areas of wetland and floodplain to create vital wildlife habitats, improve water quality and quantity, and reduce urban flooding.

Our responses to the individual questions set out in the inquiry are as follows:

1. Has the sector been constrained by the legislation and framework which govern it? How successful has this been in the past, are further changes or reforms needed?

The S&TA feel the pure lack of environmental acknowledgement in this inquiry highlights a major shortcoming in the future success of the water sector. Future reforms should involve greater environmental awareness and responsibilities within the water sector, in order to achieve the sustainable management EU obligations under WFD.

2. What changes, if any, can Government make to the current legislative framework which governs the sector to ensure it works effectively?

The S&TA believe the water industry and its regulators, need to move away from producing a 'product', and focus on delivering a catchment based 'service'. The legislation needs to be reformed to produce holistic and collaborative objectives, which favour prevention rather than cure.

Legislation should require the costs of implementing the WFD to be taken into account when determining water company investment levels. In principle, water prices should take account of all the costs that the water industry imposes on the community, and these include environmental costs.

3. What emphasis should be placed on the regulators to change the way in which they translate their remits into aims and objectives?

The S&TA feel financial regulation of Water Companies currently discriminates against them making decisions in the best interests of the environment. For example, regulation currently favours investment in "end of pipe" schemes to solve water quality problems, when alternative solutions, such as catchment sensitive farming projects, may achieve the desired water quality outcomes, but with a far lower carbon producing energy requirement.

In addition, Ofwat approved funding typically favours the cheapest option rather than the most environmentally friendly solution, and capital schemes rather than ongoing maintenance of more environmentally sensitive solutions, such as, where appropriate, reed bed effluent polishing. We feel water companies should be rewarded for environmentally friendly, sustainable outputs, and cross sector outputs.



Salmon & Trout Association

Fighting for the future of game angling

Patron: HRH The Prince of Wales

President: The Duke of Northumberland

4. What are the powers that the regulators need to be effective and make a difference to the areas they represent? What needs to change to ensure they have these powers?

The S&TA has great concern over the year on year funding reductions facing the Environment Agency (EA), which has led to approaches such as the proposal for Water Companies and other industries to monitor their own effluents. We feel effective regulation, of water quality/quantity, requires adequate funding for the EA to be made available and maintained for the foreseeable future.

5. What is the future role for the industry, should the industry take on further responsibilities in the management of the sector? Is there a need to rebalance public involvement against private?

N/C

6. What measures are needed to ensure the protection of consumers and taxpayers in ongoing management of the water sector? Should any extra powers be given to consumer bodies?

N/C

7. Who should provide the investment in the sector to meet future challenges? What balance of investment is required, does there need to be a rebalancing? How will this affect affordability for consumers and ensure fair charging?

N/C

8. What measures should be put in place to ensure the ongoing effectiveness of the management and sustainability of the water sector? Is there a greater role to be played by Parliament in the scrutiny of the sector? Should the regulators be given a wider remit, or should it be curtailed?

The S&TA feel, in the future, the water industry should have a greater environmental responsibility in implementing and achieving long-term sustainable water management goals. We feel greater cooperation is required between the water sector and other stakeholder groups, such as NGO's and farmers, to help achieve the necessary requirements of WFD.

We also feel the sustainability of the water sector requires sufficient and sustained funding to be made available to the EA, for monitoring and enforcement purposes.

The Salmon and Trout Association