

Water Efficiency and Demand Management Team
Defra

By email

Wednesday 23rd November

Dear Sir/Madam,

Re: UK Mandatory Water Efficiency Labelling

Blueprint for Water, part of Wildlife and Countryside Link¹, is a unique coalition of environmental, water efficiency, fisheries and recreational organisations that come together to form a powerful joint voice across a range of water-based issues. We welcome this opportunity to respond to the consultation on UK mandatory water efficiency labelling.

The health, wellbeing and persistence of nature and people depends on a secure, sustainable supply of water. But as this year's drought [exemplifies](#), our current relationship with water is not sustainable. Over-abstraction presents a significant threat to the freshwater environment, and demand for water is [set to outstrip supply](#) in parts of England in the next 20 years. Driving demand down and water efficiency up so that we can leave more water in the environment is essential to making this relationship more sustainable.

The introduction of mandatory water efficiency labelling is a long-standing ask from Blueprint for Water. Most recently, we have called for the introduction of water labelling requirements through our 2021 vision report '[Actions to recover England's waters and wildlife](#)', and through [our engagement](#) with Government, Ofwat and the water industry on PR24. We are therefore supportive of the proposals set out in the consultation.

However, the proposals could deliver even greater ambition in the following ways. To deliver this greater ambition, we make the following recommendations.

1. The proposals should include minimum product efficiency standards, below which products cannot be sold. This standard should be tightened gradually over time. A lack of minimum standards from the outset undermines the efficacy of the scheme.
2. The pace of this programme should be more ambitious. The efficiency label should be introduced in early 2024 rather than the proposed 2025.
3. This scheme must be situated within the wider policy context. For example, the mandatory label must feature in plans to revise Part G of the Building Regulations, to ensure that new

¹ [Wildlife and Countryside Link](#) is a coalition of 67 organisations working for the protection of nature. Together we have the support of over eight million people in the UK and directly protect over 750,000 hectares of land and 800 miles of coastline.



and retrofitted homes will have the most water efficient devices installed. Failing to do so risks missing a crucial opportunity for the scheme to deliver maximum benefit.

We also wish to flag our support of Waterwise's submission to this consultation, which responds to the individual questions in greater technical detail. Waterwise are a member of Blueprint for Water, and we echo their response.

We do not require our response to be kept confidential, and would be pleased to discuss any of these points further.

Many thanks, and kind regards,

Ali Morse, Water Policy Manager, The Wildlife Trusts, Chair, Blueprint for Water.

Nik Perepelov, Senior Water Policy Officer, RSPB, Vice Chair, Blueprint for Water.

On behalf of Blueprint for Water