



[www.blueprintforwater.org.uk](http://www.blueprintforwater.org.uk)

**Blueprint for Water response to the consultation on the proposal to use Environmental Improvement Usage Charge funds to implement hydromorphological changes**

**1. Introduction**

This consultation takes place in a rapidly changing policy landscape, with regard to abstraction, including: potential provisions in the Water Bill; new guidance to Ofwat; possible funding of the RSA from PR14; and the pending European Commission action against Germany on the restricted definition of Water Services under the Water Framework Directive.

Given that our views – and presumably the views of many stakeholders – on the Environmental Improvement Unit Charge (EIUC) may change as these issues unfold, we feel that this consultation should be delayed for another six months until there is greater policy clarity.

**2. General comments**

We are surprised that there is no mention under paragraph 1.3 of the Environment Agency’s ability to amend abstraction licences in circumstances where serious environmental damage is occurring with no compensation due to the abstractor; before using the EIUC, this option should be explored in detail.

In addition, we note that extensive assessment and analysis assessing the current ecological state of a site needs to be undertaken before works are planned, to ensure that damage is minimised.

**3. Answers to consultation questions**

***1. Should the Environment Agency use Environmental Improvement Unit Charge funds to implement hydromorphological measures to address unsustainable abstraction?***

Yes, but only in certain circumstances:

- a) Unsustainable abstraction by definition must be addressed directly, at the very least in parallel with hydromorphological measures. The funds should not be used to facilitate new abstraction licences, conditions around these should not adversely impact on the environment.
- b) There should be a hierarchical approach: under the Water Act 2003, where there is serious damage to the environment, an abstraction licence should be varied or revoked without compensation; where this does not apply, efforts should be made to decrease the level of abstraction, since decreasing abstraction is always better than mitigation measures; only if reducing abstraction is not possible should mitigation measures be looked at (on the same basis as those applied under the Habitats Directive).
- c) It should not undermine the Polluter / Abstractor Pays Principle

***2. If you support the proposal, should the Environment Agency use some of the Environmental Improvement Unit Charge funds it has already collected (since 2008) for this purpose?***

Yes, it is our understanding that this charge has only rarely been used and it therefore makes sense to use it to fund improvements under the conditions specified in our answer to question one.

#### **4. Blueprint for Water coalition**

The Blueprint for Water coalition is a unique coalition of environmental, water efficiency, fishing and angling organisations which call on the Government and its agencies to set out the necessary steps to achieve “sustainable water” by 2015. The Blueprint for Water is a campaign of Wildlife and Countryside Link. More information is available at [www.blueprintforwater.org.uk](http://www.blueprintforwater.org.uk).

This response is supported by the following nine organisations:

- Buglife – The Invertebrate Conservation Trust
- Freshwater Biological Association
- Royal Society for the Protection of Birds
- The Rivers Trust
- Salmon & Trout Association
- The Wildlife Trusts
- Waterwise
- Wildfowl and Wetlands Trust
- WWF-UK

#### **Wildlife and Countryside Link June 2013**



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