

Sir James Bevan  
Chief Executive  
The Environment Agency  
2 Marsham Street,  
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20 August 2020

### **The future of our freshwater environment**

**Dear Sir James,**

Cc Minister Pow, Parliamentary Under Secretary of State  
Cc Emma Howard-Boyd, Chair, The Environment Agency

Recently, you spoke of “thoughtful reform” of the Water Framework Directive regulations to deliver “even better outcomes”. In light of growing public concern about water pollution, over-abstraction of sensitive rivers and streams, and serious ongoing shortcomings in water quality, any weakening of Water Framework Standards would be a backward step.

At the heart of the Directive is the principle that the water environment is a system, and all parts of that system need to be in good working order for it to operate effectively. That principle remains true and the clarity of the “one out all out” rule should not be abandoned. As we approach the 2027 deadline for most WFD targets, our ambition must not be reduced. The Government should promptly publish its long-awaited update of the current status of water bodies and include the investment needed to achieve the target of good status by 2027 in the Spending Review.

Nevertheless, we agree with you that the way that WFD measures progress with a simple pass or fail means that continuing improvement is not always acknowledged. The Environment Agency’s “kilometres enhanced” metric attempts to clarify progress, but it is a measure of activity rather than real improvements in the quality of water.

Instead, we propose that the Government should add to the WFD framework in three ways:

- First, without weakening the current target for waters to achieve good status, Government should introduce a new metric for “elements improved” that reports improvements in individual aspects of water quality. This could give the number of changes of status achieved for elements considered as part of WFD assessments. It would illustrate each step on the journey towards achieving good or high status overall. It could be used to acknowledge improvements without implying that the waterbody achieves an overall clean bill of health.
- Second, Government should introduce a new long-term target in the Environment Bill framework for “clean waters” of the highest quality. This measure could be based on the extent of waters, measured in hectares, at high ecological status in the Water Framework Directive and a “inland bathing waters” standard. This would give the public confidence in the highest standards of water quality and create a goal for continuing improvement.

- Third, the way the Directive has been implemented omits protection for small waters (headwater streams, small lakes, ponds and ditches) and wetland habitats outside protected areas which constitute a large proportion of the water environment. We know these waters can be essential components of ecological networks, supporting rare species and pollinators. The Government should address this gap with a commitment at Spending Review to a programme of restoration and enhancement of small waters delivered through the Nature Recovery Network.

Domestic regulations based on the EU Water Framework Directive can certainly be improved, but to cherry-pick only those aspects of the WFD that can most easily or cheaply be achieved is not to meet the aspiration of the UK public for a cleaner, greener future. The core target of achieving good status and a healthy water environment by 2027 should not be weakened.

We must use this opportunity to go beyond the basic aims of the Water Framework Directive, with proper recognition for genuine improvements, a wider focus on the water environment, and an additional target for achieving the highest standards of water quality.

We would welcome the opportunity to discuss our proposals with you in more detail.

Yours sincerely



Ali Morse  
Chair, Blueprint for Water

Dr Tony Gent, CEO, Amphibian and Reptile Conservation

Jamie Cook, CEO, The Angling Trust

Kit Stoner, CEO, Bat Conservation Trust

Matt Shardlow, CEO, Buglife

Dr Jeremy Biggs, Director, Freshwater Habitats Trust

Paul Coulson, Director of Operations, Institute of Fisheries Management

Andy Knott MBE, CEO, League Against Cruel Sports

Sandy Luk, CEO, Marine Conservation Society

Jill Nelson, CEO, People's Trust for Endangered Species

Ian Dunn, CEO, Plantlife

Beccy Speight, CEO, RSPB

Nick Measham, CEO, Salmon & Trout Conservation

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Chris Butler-Stroud, CEO, Whale and Dolphin Conservation

Dr Mark Avery, co-founder, Wild Justice

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