

*Blueprint for Water is a unique coalition of environmental, water efficiency, fisheries and recreational organisations, part of the wider environmental NGO coalition, Wildlife and Countryside Link. Blueprint members come together to form a powerful joint voice across a range of water based issues.*

Dear Environment Agency,

We welcome the opportunity to engage with this consultation and have chosen to focus in our response on an aspect that we feel is lacking; the consideration of environmental drought.

This summer we have seen rivers suffering from low flows, with the Environment Agency and others forced to take action to combat the impacts upon species and habitats. As discussed at the National Drought Group, site managers and agencies have had to take atypical measures to manage wetland habitats and to support fish populations impacted by low flows, high temperatures and low levels of dissolved oxygen.

However, with water supplies not predicted to be significantly affected, few Temporary Use Bans (TUBs) and other water-saving measures have been triggered. This means that the environment has borne the brunt of the impact, whilst water customers and companies have had to make few if any concessions.

We would like to see in future much more pre-emptive and pro-active work from the water industry to raise awareness of water stress and encourage customers to be less wasteful with water. Currently the requirements that have to be met to enable companies to implement various drought measures mean that often the opportunity to reduce the environmental impacts of abstraction are missed. By the time TUBs are permissible, they will have insufficient impact upon the environment to make their use worthwhile. Yet customers are puzzled by this apparent inconsistency; how can it be 'too late' to save water? Why weren't we asked to help earlier?

In future, we would like to see:

- a) Changes in guidance or process that make it easier to use TUBs, for example by ensuring that companies are not penalised for doing so. Levels of service commitments agreed with customers could, for example, be used primarily to justify the investment that companies should make in water resources or water efficiency work in order to ideally meet those levels of service. Provided that companies have adhered to their plans and made the investment that was believed necessary, they should not then be penalised for breaching level of service commitments if they put in place TUBs or other measures in order to help alleviate environmental pressures. This would be reflective of the fact that drought predictions used for investment planning are not infallible; if unexpected droughts do then occur, it would give companies the flexibility to seek to reduce environmental harm without fear of financial loss.
- b) More voluntary approaches to saving water, for example, if prevailing conditions mean that the use of TUBs is anticipated, companies could explicitly encourage voluntary uptake of TUB measures by their customers in advance of future implementation of the bans.

- c) A greater commitment from the industry to sharing water saving messages particularly during dry weather (the time when customers will most relate to these), but also doing more to communicate longer-term and ongoing water stress issues (for example, such as explaining to customer how 'dry' or stormy winters do little to replenish groundwaters, meaning that resources remain under pressure). This could usefully be a feature of Regional Water Resources Plan guidance.

Yours sincerely,

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