

Environment Agency

Water stress determination update

Background to CIWEM

CIWEM is the leading independent Chartered body for water and environmental professionals, promoting excellence within the sector. The institution provides independent commentary on a wide range of issues related to water and environmental management, environmental resilience, and sustainable development.

CIWEM is pleased to see this work being undertaken to provide up to date classifications and welcomes the opportunity to respond to the Environment Agency on its water stress determination update consultation.

This response is provided with input from our Water Resources specialist panel.

Response to consultation questions

1. Do you think that the approach using water available for supply, environmental needs together with future demand for water effectively supports the determination of areas of water stress in England? If not, how could it be improved?

Yes, we think the approach supports the determination of areas of water stress. We are pleased that the approach has been updated to reflect improved understanding and particularly encouraged that it more consciously accounts for environmental protections. The climate and ecological emergencies are a priority for CIWEM and we are supportive of work being done to address these challenges.

The approach could be improved by also considering high impact peak demand events, which we know will become more common and pronounced due to climate change. Peak demands are critical in assessing system resilience, and recent work on peak demands (e.g. Artesia's collaborative project looking at the 2018 peak demands) recognised that metering could reduce peak demands. Considering evidence from recent high impact peak events could also prove useful in making the determination of water stress areas more reflective of customers' potential lived experience.

2. Do you agree that the proposed classification results effectively reflect the levels of water stress in England for the purpose of metering? If not, why?

We agree that the classification reflects the levels of water stress in England in a way that is appropriate for use in applying the current government policy in this area.

However, we strongly believe that Government policy should be updated to allow compulsory metering all areas, providing there is a supporting business case and customer support, by removing the link to water stress mapping. There is clear evidence that average

household consumption reduces when meter rollout increases. Therefore metering is an effective demand management measure in all areas, regardless of water stress classification. The required amendment to the Water Industry Act to allow this would be relatively minor.

We take this policy position because CIWEM believes that metering is the fairest way for household customers to pay for water services. Water metering can also provide excellent benefits in the form of water, energy and carbon savings (leaving more water in the environment and contributing towards net zero goals) and network management including identifying customer leaks. Allowing metering outside areas of serious water stress could also allow more resources to be freed up in these areas and allow more transfer of water into regions with greater supply-demand deficits.

We understand that water companies not classified as operating in areas of serious water stress can take forward metering programmes and would like to see this approach promoted and supported should an amendment to the Water Industry Act not be forthcoming.

3. What is the right size of area for the classification of water stress?

The company approach taken seems useful for business planning.

It would be useful to have sight of the work being done with the devolved nations to ensure a joined-up approach to national water resource mapping and management regarding water stress.

4. Do you agree that classifying water stress according to 2 levels, serious and not serious is still the right approach? If not, please explain your answer and suggest an alternative.

We understand that government policy means that compulsory metering can only be considered in areas of serious water stress. Whilst we would like to see water metering extended to all areas, we understand that maintaining this system does allow compulsory metering to be rolled out to those areas most in need without updating government policy. For this reason, we agree with the use of the two classification levels.

However, we have concerns around the use of the phrase 'not serious' from a customer communication perspective given that all regions are susceptible to drought. We would prefer more risk reflective classification labels such as areas of "higher risk of serious water stress" and "lower risk of serious water stress".

5. Are there any water company areas you would like to be included or excluded? If not, please explain your answer and suggest which areas.

We have no comments on this question.

6. Do you agree with the approach we have taken for the Isles of Scilly because of the available data and that water resources planning for the Isles is at an early stage? If not, please explain your answer.

Yes, we agree with the approach taken.

7. Please add any other points related to water stress you would like to raise as part of this consultation.

We have no further points we wish to raise.