



Parliamentary Briefing

Protecting the UK's Rivers

November 2014

Summary

- **Soon after the General Election, in Autumn 2015, the Secretary of State will make one of the most crucial environmental decisions of the next Parliament. It is essential that a holistic framework is put in place to deliver a healthy freshwater environment and the billions of pounds of net benefit to society by getting 75% of water bodies to a healthy state by 2021.**

Introduction

Rivers, lakes, wetlands and beaches form a complex water system which has shaped the hills and valleys of our islands for millennia. Our wellbeing depends on this system, and so too does the wellbeing of our wildlife. But today less than a quarter of our water system is classified as healthy.

There are many causes: pollution, habitat destruction, and too much water being drawn out for homes and businesses. This means there are fewer places for us to fish and explore; fewer places for birds and water voles to thrive; and our homes are affected too, as the quality of our water environment affects drinking water and sanitation costs as well as flood management.

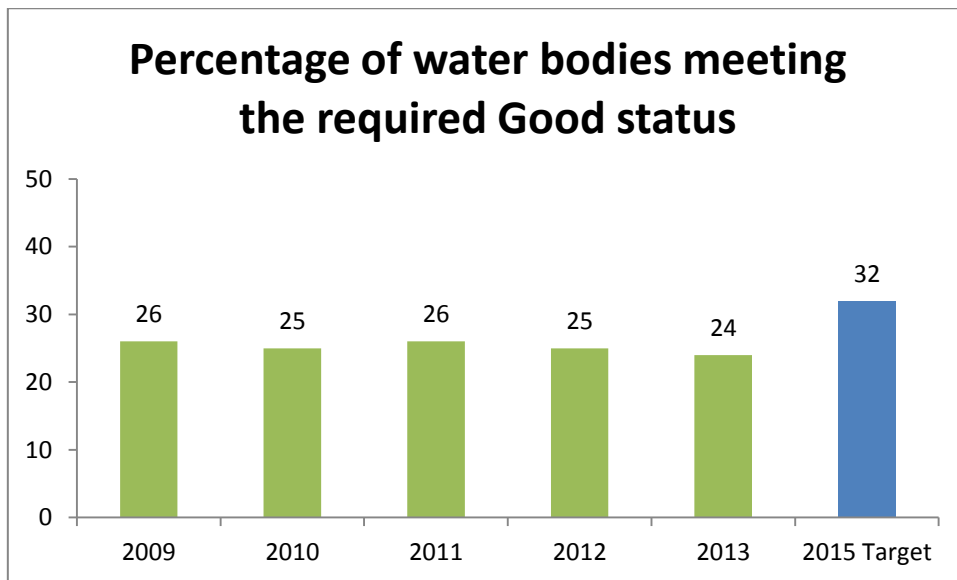
A new way to manage our rivers and coasts

River Basin Management Plans (RBMPs) provide the framework to understand and manage the pressures facing our water environment in an integrated and cost-effective way. They represent a world-leading innovation, organising the management of water bodies at a natural geographical and topographical scale (ie river basins), and empowering local citizens and groups (through management plans).

These two aspects form the delivery mechanism for freshwater policy, and RBMPs cover every river in the UK – 4,495 water bodies in total.

Setting the scene:

In December 2009 the Government published the first set of RBMPs. These showed that 26% of water bodies in England and Wales were at 'Good' status, and set out measures intended to increase that by 2015, but only to 32%.



Our organisations were amongst many that expressed disappointment at this low level of ambition. However, as the Environment Agency (EA) figures above¹ show, progress against even these lowly objectives has stalled or even reversed: from 2009 to 2013 the percentage of rivers at ‘Good’ status decreased from 26% to 24%.

There are a number of ecological and technical reasons why progress might have been delayed, but overall it is hard not to conclude that current management of our rivers is failing even to maintain the status quo, let alone deliver improvement.

What is the Government doing about this?

Soon after the General Election, the Secretary of State will be faced with one of the most crucial environmental decisions of the next Parliament; what should go into the second round of RBMPs.

Their decisions will be informed by a consultation process launched this October by the EA. This consultation and the data that underpins it represent a real improvement in process. However, we have significant concerns about what change, if any, the plans will drive on the ground.

Priorities going forward

Meaningful review: The lack of ecological improvement suggests that the measures set out in the 2009 plans were woefully inadequate. However, we have seen few if any proposals for significant new resources or measures in the form of advice, incentive or regulation to tackle longstanding problems such as diffuse pollution. As a result we are extremely concerned that the Government intends to repackage the same ineffective suite of measures and expect a different result. We believe this is unacceptable.

We call on the Government and EA to implement best practice in policy development by reviewing the effectiveness of current measures and using the understanding gained about gaps and inadequacies to shape the new plans in 2015.

Action on abstraction, pollution and Protected Areas: We believe particular attention needs to be paid to the suite of measures designed to tackle the widespread problems of unsustainable abstraction, agricultural pollution and failure to meet Protected Area objectives.

¹ Environment Agency. 2013. Water Framework Directive Classification 2013 progress update , October 2013.

- Despite welcome progress on tackling unsustainable water company abstraction following the Water Act 2014, no effective measures are currently proposed to tackle pressures from other sectors (power, farming etc).
- One third of water body failures can be attributed to the agricultural and rural land management sector² and there is mounting evidence that this is a widespread problem³, underpinned by non-compliance with baseline regulation⁴.
- The EA is now clear that *“it will not be possible to complete all the measures needed to achieve water-dependent objectives for Natura 2000 protected areas, by the December 2015 deadline”*⁵. Our organisations are highly concerned about other water bodies if the EA fails to meet deadlines for our most important protected areas.

What could be achieved?

Launching the consultation on the RBMPs the EA states that *“there are choices that Ministers could make to accelerate or decelerate the levels of action and ambition”*⁶. To inform that decision the EA has presented economic analysis for five scenarios for the next RBMP period, with variations in total ambition, total money available, and funding breakdown per sector (public purse vs different industries etc).

The EA’s best case scenario suggests £8.5 billion of net benefit to society by taking cost-effective actions that will get 75% of water bodies to good health over the next six years⁷. It is clear that cleaner rivers, lakes and beaches will mean increased tourism and recreation for the surrounding areas, alleviate flooding, and improve the resilience of public water supply and quality.

The consultancy *Indepen* went further and concluded that, with improved environmental valuation and catchment based approaches, *‘the net saving across these components of catchment expenditure over the next 15 years could be over £1bn for the water sector and over £4bn across other sectors.’*⁸ So this would mean a £1bn saving to the water industry that in part would be passed back to customers in reduced bills; and £4bn across other sectors, including reduced capital/maintenance spend on flooding for central Government.

However the EA’s ‘most likely scenario’ – the business as usual approach - forsakes £7bn of these benefits by aiming to get just 37% of water bodies to good health. Even this is likely to be an overestimate of what might be achieved, given that the economic modelling assumed, incorrectly, that there would be 100% uptake of voluntary measures, investment would be targeted to maximum effect and regulations would be fully enforced. It is unclear whether such low ambition and unfounded planning assumptions will be legally compliant with the Water Framework Directive.

We believe it is essential that the Secretary of State takes bold action to go beyond ‘business as usual’ to deliver real benefits for the environment and best value for taxpayers, water customers and businesses.

² Environment Agency. 2014. Progressing towards WFD objectives – the role of agriculture.

³ RSPB (Weyell, J and Cunningham R). 2014. Catchment Walkovers: observations of pressures on the water environment. An analysis of historic Environment Agency catchment walkover survey data.

⁴ E.g. WWF. 2014. Securing compliance research.

⁵ Environment Agency. 2014. A consultation on the draft update to the river basin management plan Part 2: River basin management planning overview and additional information

⁶ Environment Agency. 2014. A consultation on the draft update to the river basin management plan Part 2: River basin management planning overview and additional information

⁷ Environment Agency. 2014. A consultation on the draft update to the river basin management plan Part 3: Economic analysis.

⁸ Indepen, 2014, The potential for catchment services in England. Report for Wessex Water, Severn Trent Water and South West Water .

Who pays?

The vast majority of costs associated with delivering the first round of RBMPs were met by the water companies and therefore ultimately by water customers. Our organisations do not believe that this model is sustainable or fair. The impact on consumers is compounded by the failure of successive governments to reform the regressive household charging system and replace it with a national metering programme, which currently leaves vulnerable groups paying disproportionately for pollution they have little to do with.

Sector	Scenario 4 'polluter pays' 75% Good	Scenario 5 'currently pays' 37% Good
Government	14%	18%
Industry	9%	7%
Agriculture	41%	3%
Water companies	36%	72%

The Environment Agency's economic analysis⁹ (summarised in the table above) presents two very different sector apportionment scenarios: one based on polluter pays and one based on business as usual. Our organisations believe that the polluter pays principle should play a defining role in how measures required to deliver the RBMPs are distributed. In particular we need to see:

- greater alignment of conditions attached to existing funding, such as Single Farm Payment under the Common Agricultural Policy, to ensure we get best value for the money we are already committed to spending; and
- Fines and penalties for pollution and breaches of environmental regulation that reflect environmental damages, with monies raised recirculated into enhancement.

What can you do about this?

After the RBMP consultation closes in March, Defra and the Environment Agency will review the consultation responses for final Ministerial signoff in December 2015. The concerns we have raised above on the need for adequate and effective river management measures, ambitious conservation objectives and overall cost need to be brought to the attention of Ministers.

To this end while the RBMP consultation is currently live, our organisations are working with local conservation and angling groups up and down the country to ensure the widest public response reaches government on the importance of improving our rivers, lakes, wetlands and beaches.

If you receive constituent inquires about the RBMP consultation please send them onto our website saveourwaters.org.uk.

Contact	Dominic Gogol; Public Affairs Specialist; WWF-UK Rob Cunningham; Head of Water Policy; RSPB Mark Owen; Head of Freshwater; Angling Trust
Email/Tel	Dgogol@wwf.org.uk ; 07771 818704 rob.cunningham@rspb.org.uk; mark.owen@anglingtrust.net;

⁹ Environment Agency. 2014. A consultation on the draft update to the river basin management plan Part 3: Economic analysis.