

Waterwise Stakeholder Consultation Water UK response

Introduction

Water UK is the industry association that represents regulated UK statutory water supply and wastewater companies at national and European level. We are a policy-based organisation and represent the industry's interests with Government, regulators and stakeholders in the UK and in Europe. Our core objective is sustainable water policy – actions and solutions that create lasting benefit by integrating economic, environmental and social objectives.

We are grateful for the opportunity to respond to this consultation. The water industry was instrumental in establishing Waterwise. We are grateful for the excellent work it has done in a short space of time and support its continued operation and its aim of promoting water efficiency.

The comments contained within this paper are those of Water UK developed in discussion with member companies and stakeholders. They do not necessarily reflect a consensus view of the water industry as a whole. Individual member companies may reflect their own views in their own responses.

General comments

1. We support the long term objective of a more water efficient economy. Key to this will be increased levels of metering, use of tariffs, improved awareness and communication with customers and the public, labeling, product controls, retrofitting, and a range of other water efficiency measures.
2. We would stress that the appropriate level of water efficiency activity will vary both geographically and over time. Most water efficiency activities have a cost associated with them and these must be balanced against the potential benefits. We therefore support measures that are economic and do not disadvantage society or consumers. Waterwise can play an important role in helping to reduce the costs and in identifying/quantifying the benefits associated with water efficiency measures.
3. More specifically, the evidence for long term sustained reductions in consumption must be robust to ensure investment is soundly based. We need to better understand customer behaviour and consumption at point of use. Current methodologies for assessing consumptions patterns and forecasting are uncertain and Waterwise can play an important role in understanding, influencing and triggering changes in consumer behaviour.

4. We would like to see water efficiency align with the broader agenda around resource efficiency and sustainable consumption. At present, energy, waste and water are often considered in isolation and initiatives such as the Community Energy Saving and Decent Homes programmes are focused on one element only (usually energy). We would like to see Waterwise focusing on ensuring that a joined-up approach to resource efficiency is established across all government, public and private programmes.
5. We are also aware of and have detailed specific policy and regulatory barriers to the more effective implementation of water efficiency in the water sector. We think there is a key role for Waterwise in addressing these and would like to see effort expended on removing barriers and providing positives to increased water efficiency.

Response to specific questions

Putting water efficiency into perspective – understanding the present and future context

1. Do you think section 2 accurately reflects the context for water efficiency? If not, what would you add?

The section is a reasonable reflection of the current context and sets out the key drivers for action. It recognises that long term success in water efficiency depends ultimately on behavioural change. The strategy could however differentiate between change that is brought about through technological innovation, market transformation and behaviour. Different approaches may be required to sustain benefits derived from actions or measures. The need for continued actions and investment to maintain savings has limited attention in the strategy.

We agree that Waterwise has been ‘shaping a positive regulatory framework’. However there are key issues that have not yet been addressed including actions from the Water Saving Group, such as water efficiency guidance for public bodies, promoting water efficiency in industry and commerce and a review of the Water Fitting Regulations. We would welcome further information on the role Waterwise can play in helping to deliver these measures.

We also think that the degree of customer satisfaction that may be generated by low levels of water use should be considered, since there is potential for post-construction changes to properties. In this respect the strategy should consider the competing pressure of ‘luxury bathrooms’ and how this is being addressed by Waterwise.

Steps by Waterwise to promote product labeling have been successful and so have partnership promotions with suppliers and retailers. However point of sale control remains

a considerable challenge in retrofitting of higher water use appliances. The strategy should consider how Waterwise will act to limit the availability of high consumption products at the point of sale and in their fitting. For example, should Waterwise have a role in offering training facilities for architects, surveyors and plumbers?

Some of the information in this section is rather selective and we would urge Waterwise to be careful about painting too bleak a picture of future water availability. The information is based on single point projections provided by the Environment Agency (EA). Whilst some of these 'worst case scenario' situations may come to fruition, other scenarios, with more moderate impacts of climate change on summer precipitation for example, are at least equally likely. The UK Climate Impacts Programme has stressed that its latest projections (UKCP 09) are not taken out of context and, whilst climate change is certainly a major threat to water availability in many places and at certain times of the year, the injudicious selection of particular future scenarios should not be used to justify uneconomic water efficiency or other measures.

The strategy suggests that 'Future Water' sets a target of reducing per capita consumption to 130 l/h/d. This is an aspiration rather than a target but an aspiration and Waterwise must emphasise the importance of identifying and implementing cost-effective measures to manage demand and reduce consumption. Actions should be prioritised to ensure lower consumption is achieved at least cost, taking account of the full range of costs and benefits, including water saving, energy and carbon reductions.

2. Which elements, according to you, are the most important to consider for the future?

For water companies, a key action is to ensure that regulation does not conflict with the broad economic justification for implementing water efficiency measures. We would support moves to ensure the regulatory regime actively incentivises water efficiency. Such moves might include the exclusion of water efficiency from efficiency models so that companies are not penalised for spending money on this activity, ensuring national accounting rules allow some measures to be treated as capex or creating a stronger link between infrastructure charges and water efficiency.

Waterwise could also seek support for companies to be funded to carry out trials and evaluation of actual water efficiency savings delivered by water efficiency activities.

Other key issues to resolve include the scope for water companies to include the energy and carbon savings from measures linked to CERT in water efficiency targets, and aligning the various water efficiency databases and evidence bases.

More widely, understanding and influencing behaviour is crucial, so that we understand what triggers behavioural change, how water savings occur in practice and how they are sustained over time and across seasons. For example, there is some evidence that people will revert to mains supply for garden watering during dry periods if water butts are empty.

Further partnership working will also be important for spreading and embedding the water efficiency message. This message will need to be increasingly targeted at individuals or groups of consumers, so that the most appropriate and messages can be tailored and the most cost-effective measures can be delivered.

Waterwise must continue to push for tighter regulations, product standards and better labeling around water efficiency.

Why is action still needed on water efficiency?

3. Do you agree that water efficiency should become a national priority or at least given equal status to energy efficiency?

We agree that water efficiency is important but would stress that measures must be cost effective, taking into account the full range of positive and negative external impacts. This will mean that (unlike energy efficiency which has a global driver) water efficiency measures will vary across the country.

4. In what ways should water efficiency be given equal consideration to energy efficiency?

We would like to see labeling which is consistent across and common to both areas, improved understanding of the benefits from promoting water and energy efficiency in tandem, and greater clarity over funding of joint energy/water efficiency initiatives.

5. What kind of platform is best suited to the delivery of combined water and energy efficiency projects?

This should begin at a national level with joint Defra/DECC/CLG initiatives (e.g. communication campaigns, building design and retrofit programmes). Agencies and organizations such as Waterwise, the EST and the EA should consider the links in all aspects of their work. For water companies, joint initiatives with energy companies depends partly on a clear framework being available, which should be jointly established by Ofgem and Ofwat.

Scaling water efficiency up – planning for the next ten years

6. Do you support the approach and objectives? If not, what should be the approach in the long-term and how would you emphasise the need to link water efficiency and sustainability?

We agree with the approach and objectives. Waterwise has a crucial role in helping to ensure that all communities and stakeholders should work together to deliver water efficiency. This is a societal issue and it is important that a wide range of organizations continue to be involved in the communication and delivery of water efficiency objectives. For any one group or sector to be expected to deliver significant savings would be unsuccessful, counter productive and inappropriate.

7. Do you agree that delivering in partnership is a pre-requisite to ensure a successful outcome for water efficiency? If not, why not? What approach would you find most useful?

In general, this is true and partnering is generally more cost effective than individual projects. However, water efficiency initiatives can deliver successful outcomes when undertaken by individual companies or organisations.

8. Do you agree that more local focus is necessary? If not, why not? What would be the most effective level for delivery?

We think that Waterwise can play a national role (e.g. in shaping policy, delivering an overarching communication strategy, shaping behaviour and linking water and carbon) at the same time as having a more local focus. The latter role needs to involve water companies, local authorities and other local or regional stakeholders to deliver coordinated messages, advice and measures most cost-effectively.

9. Are there any other groups (other than those mentioned), which should be included in delivery partnerships?

The list is comprehensive but we would perhaps distinguish between government departments and government bodies/agencies (both need to be involved, but often separately) and add architects.

10. Do you think a UK Water Efficiency Forum would be helpful in enhancing actions for the benefit of water efficiency and stakeholders?

We agree in principle. However, we would need to understand the proposed role, activities and anticipated benefits of the forum in more detail.

11. Despite the current property market and economic downturn, do you agree that there is still a need to promote water efficiency and to approach it on a step-by-step basis? If not, why not?

We agree, since water efficiency has the potential, as part of a broader green and low carbon economic recovery programme, to stimulate activity in the building and other sectors that will in turn deliver long term savings for the UK economy.

However, we would reiterate that water efficiency should be undertaken where it is cost effective to do so, in partnership where possible and where savings are likely to be delivered and sustained over time.

12. Do you agree that further policy actions are required?

Further government action on labeling (to improve information provision), regulating against very high water using appliances and delivering appropriate leadership (e.g. on metering) and guidance is still required.

13. Among all the policy options set out in this document, and in Waterwise's UK manifesto, which do you think require the most urgent implementation?

We would reiterate the points made in response to question 2. In particular, the message that wasting less water saves water for the environment, but also money and carbon, is important to stress. In addition, regulating for greater water efficiency will be needed in some circumstances, e.g. in the forthcoming review of the Water Supply Regulations and in local government planning.

14. How often should the Evidence Base be updated to be most helpful to the regulators and practitioners?

We think that main updates should occur once every 5 years to inform the periodic review. For PR14, the next main update would need to be available during 2012. Waterwise has a role in ensuring all evidence is monitored and reported in a consistent way, to improve transferability. Future updates should also include the cost of carbon in the assessment of water efficiency measures.

We would also stress that the evidence base needs to be linked to, or perhaps part of, the UKWIR water efficiency database

15. Which elements linked to water efficiency should be critically considered for further research?

- How behaviour change is triggered and how it can be sustained over time. Many trials and projects only measure short term savings and are unable to determine which methods sustain behaviour change.

- Actual water saved as opposed to theoretical assumptions around consumer acceptance and savings
- The most effective forms of communication with water consumers to deliver quantifiable savings
- The carbon effects of water efficiency measures

16. How should research and the Evidence Base results be best communicated and made available to practitioners?

We would like to see a combination of stakeholder updates, documented reports and dissemination workshops. The media should be used to communicate results and allow feedback and improvements.

17. How should consumers and businesses be encouraged to participate further in the delivery of water efficiency?

Through a sustained national communication programme with a consistent and common message, and using real examples of how savings are achieved and what can be done to improve efficiency of water use. In addition, clear and concise labeling on products to agreed standards would ensure water efficiency is considered at point of sale.

18. As a consumer, what would be the incentive for you to become more water-efficient?

- A better understanding how water efficiency actions improved the environment, saved money and carbon
- Cheaper or competitively priced water efficient technology, widely available, continuously improved and easy to maintain with clear and concise labeling on water consumption to approved standards
- Coordinated communication from organisations offering energy efficiency, water efficiency, waste reduction and recycling