



Dear Secretary of State

Implementing the Water Framework Directive

The Government recently announced a £10 million investment in rivers and wetlands. Such additional investment is obviously welcome but there is still a very long way to go to achieve a good quality water environment in England and Wales. Of particular concern is the narrow focus on the water industry to deliver the environmental objectives of the Water Framework Directive and the apparent lack of contribution from other sectors.

We believe there is time to redress the balance of the final River Basin Management Plans (dRBMPs) before you sign them off. This will substantially increase environmental and economic benefits of the Water Framework Directive. In particular we believe there needs to be greater emphasis on tackling diffuse pollution from rural and urban sources through changes in policy, incentive and advice. We also believe there needs to be more emphasis on effective regulation including Water Protection Zones.

Problems

Many human activities adversely affect the quality of water but diffuse pollution from agricultural and urban sources is a particularly significant and growing threat.

This is not just bad for wetland wildlife and the overall quality of rivers, lakes and coastal waters, it also has a significant financial impact. The water industry in England and Wales has invested billions of pounds in improving the water environment and protecting drinking water quality over the past two decades. However despite this expenditure the annual operating cost of dealing with the effects of diffuse pollution in all its forms, particularly pesticides, nitrates, pathogens and industrial chemicals remains high and adds considerably to the industry's carbon footprint. Furthermore, the cost of the present situation to water customers is high.

We think that within the published draft RBMPs, the apportionment of responsibilities between different sectors is unbalanced and potentially unsustainable. Most of the expenditure continues to fall to the water industry and its customers. Given that diffuse pollution, especially from agriculture, is one of the main reasons why water bodies are failing to achieve good ecological status, it is hard to understand why the draft plans fail to tackle this issue with effective incentives and regulation. As a result, agriculture is expected to make a small contribution – less than five per cent – to improvements up to 2015.

Local authorities have in the main been slow to recognise the importance of their planning and operational responsibilities in shaping the water environment and the delivery of the Water Framework Directive. We do not believe that enough is being done to inform them or give them incentives to deliver improvements.

In particular, local authorities should play a greater part in managing urban diffuse pollution and in introducing sustainable drainage solutions to help control the quality and quantity of run-off from the urban environment. While we are encouraged that the draft Flood and Water Management Bill contains proposals to encourage the use of sustainable drainage systems we want to see stronger targets for their use set within the RBMPs.

Solutions

The Water Framework Directive offers an unparalleled opportunity for us to improve our understanding of these complex issues and the apportionment of responsibility when it comes to creating solutions. But after viewing the published draft RBMPs, we can only conclude that this chance will be missed without further action.

There is still time to grasp the opportunity however.

First, to help us to understand fully the contribution of sectors to diffuse pollution, we need to develop a more intensive catchment-based approach to identifying the pressures and causes of failure in good status. This would enable us to design and target measures in a cost-effective manner. It will, however, require increased upfront investment.

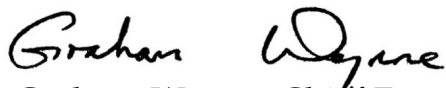
Secondly, once the sources of diffuse pollution have been identified, there need to be clear and enforceable measures (with a known outcome) that can be implemented equitably across the contributing sectors.

For example, we need to get more for the £2 bn taxpayers spend supporting agriculture every year. This means setting tougher resource protection standards through cross-compliance. It also means continuing to shift money from payments that only require minimum agricultural standards to be met towards schemes that support farmers who want to take positive action to protect water quality and help the environment.

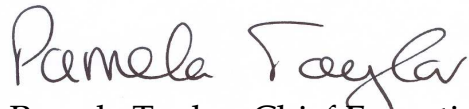
Finally, for those instances where landowners and industrial companies are reluctant to play their part, we urge action to introduce a comprehensive set of Water Protection Zones underpinned by robust prescriptions and tough enforcement.

We will be sharing our views with stakeholders who have an interest in the water environment.

Yours sincerely,



Graham Wynne, Chief Executive, RSPB



Pamela Taylor, Chief Executive, Water UK



Dame Yve Buckland, Chair, Consumer Council for Water