

EBNet Response to

# A Fresh Water Future – CIWEM stakeholder survey 2023

Response of the Environmental Biotechnology Network  
[www.ebnet.ac.uk](http://www.ebnet.ac.uk)

*Cite as:* EBNet, 2024. EBNet response to A Fresh Water Future - CIWEM Stakeholder Survey 2023.  
<https://ebnet.ac.uk/resources>

**Contact:**  
The Environmental Biotechnology Network [ebnet@ebnet.ac.uk](mailto:ebnet@ebnet.ac.uk)



Biotechnology and  
Biological Sciences  
Research Council



Engineering and  
Physical Sciences  
Research Council

# A Fresh Water Future – stakeholder survey

The following pages reproduce the EBNNet response to the Chartered Institute of Water and Environmental Management (CIWEM) Stakeholder survey on A Fresh Water Future

For the CIWEM report, see [A Fresh Water Future](#)

## Stakeholder survey Introduction

There is growing awareness of wide-ranging and in places acute pressures on the health of our freshwaters (lakes, rivers, streams, groundwaters). These causes are often complex and range from agriculture, water industry and highway management activities, to the design and use of a wide range of products and chemicals, and how we plan and develop our towns and cities.

Policy, regulation, enforcement and solutions-delivery capacity have arguably not kept up with these pressures. Is it time for *A Fresh Water Future*? We want to hear your views.

*A Fresh Water Future* is an independently-funded project, delivered by CIWEM ([www.ciwem.org](http://www.ciwem.org)) but overseen by a range of environmental NGOs, experts and practitioners, which aims to understand where consensus may be built on how water should be managed better in the future.

It aims to develop an ambitious but informed and workable future vision and approach to managing water throughout the UK, to which a wide range of parties with roles to play in delivering healthy and resilient freshwaters can commit.

The work is based on the following positions:

- That the health of freshwaters (their quality, ecology, morphology and climate resilience i.e. resource) is declining in the face of increasing pressures from development, industrial activity (e.g. water processing and agriculture) and climate change, and
- There is widespread concern amongst the public, interest groups and water managers that decline must be reversed and nature recovery and climate resilience achieved.

Whilst the survey is open to any respondent many of the questions assume some level of familiarity and technical or regulatory knowledge of land and water management. You do not need to answer all questions – please answer those on which you have a view and skip those you do not wish to answer. However the more you can answer the more evidence we have to build a consensus picture.

Survey responses will be used to feed into workshops, focus groups and desktop research underpinning *A Fresh Water Future*.

The deadline for responses is **Tuesday 26th September**. Completing this survey will take from 15 minutes depending on the number of questions answered and level of detail you provide. You can skip sections that you don't feel qualified / wish to answer.

## Personal Data

1. Completing this survey is voluntary, responses will be anonymised any personal data provided will be used for the purposes of the project (i.e. further engagement, obtaining case studies). Information collected will be stored in accordance with CIWEM's Privacy Policy (<https://www.ciwem.org/privacy-policy>). For further information and queries related to the survey contact Alastair Chisholm at [alastair.chisholm@ciwem.org](mailto:alastair.chisholm@ciwem.org) \*

I agree. Start survey

## About you

Please tell us a little bit about you and your interest in A Fresh Water Future.

2. Are you responding as an individual or organisation ? \*

Individual

Organisation

3. What is the name of the organisation you work for?

Environmental Biotechnology Network ([www.ebnet.ac.uk](http://www.ebnet.ac.uk))

4. Please describe your area of activity \*

- Central Government
- Regulator
- Local Government
- Water Company
- Consultant
- Contractor
- Product Manufacturer
- Infrastructure Operator
- Farmer or land manager
- Academic
- National-level NGO
- Local Campaign Group
- Interested Public
- UKRI-funded Network

5. How would you define your knowledge level on water issues?

\*

- Expert
- Interested and informed

Interested, not informed

Other

## The current state of freshwaters

Please tell us about your current perspective on the condition and health of freshwaters.

6. Do you consider the health of freshwater to be:

Excellent

Good

Moderate, improving

Moderate, declining

Poor

Critical

7. What do you consider to be the main sources of pressure on freshwaters?

Please choose your top three.

Wastewater treatment / sewerage (including private sewage treatment)

Water abstraction for public water supply

Water abstraction for non-public water supply (e.g. agriculture, energy)

Agricultural runoff (sediment, nutrients, pesticides)

Chemicals

Pharmaceuticals

Plastics and litter

Urban runoff management

Highway runoff

Industrial pollution

Population growth / demographic change

Climate change

Habitat loss

Other

## A fresh water future

The next few sections ask questions about what might be changed in the future to manage water more effectively. Please answer as many or as few questions as you feel able to.

8. Where do you see the most need for action on water management to improve freshwater health and resilience? Please identify your top three priorities.

Government policy and regulation

Water company activities

Farming and land management practices

Urban planning and development

Highway infrastructure design and/or management

Products and chemicals standards and use (source control)

Consumer / Customer / Public education and behaviours

Other

9. Reflecting on your identified priorities, what needs to change and how?

- Clear commitment to and higher prioritisation of this area from Government
- Better funding for the Environment Agency and other regulatory bodies (Scottish Environmental Protection Agency, Natural Resources Wales, Northern Ireland Environment Agency) , enabling them to be more effective in enforcing existing regulations and in pro-actively developing responses to a changing situation
- Increased monitoring of environmental performance and standards
- More effective enforcement of environmental standards, including significant increases in penalties
- Major investment in separation of surface water runoff from the sewer system to reduce peak loads on wastewater treatment plants
- Investment in upgrading and modernising wastewater treatment facilities to meet higher effluent quality standards
- Improved management and control of application of animal and poultry manures to land
- Improved coordination and integration of strategies between different bodies, e.g. planning and regulatory agencies to ensure sustainable urban planning
- Additional independent water watchdogs
- Broader public oversight and involvement in water industry regulation
- Improved standards for product and chemical use (i.e. pollutant source control)

10. Would you like to answer questions about the role of water companies?

- Yes, go to the water companies section.
- No, skip that section and go to agricultural land management.
- No, skip water companies and agricultural land management and go to urban pollution management.
- No, skip all three sections and go to the conclusion.

## Water Companies

Water companies, their responsibilities and how they operate.

11. What is your preferred model of water company ownership?

- Privatised (current model in England)
- Privatised but with stronger governance around public benefit / interest
- Not for profit (e.g. Dwr Cymru Welsh Water)
- Nationalised (e.g. Scottish Water or English pre-privatisation arrangement)
- Government-owned, contractor-operated (e.g. Northern Ireland Water)
- Other

12. If the water industry remains privatised for the foreseeable future, are there additional corporate governance measures which should be put in place to provide for improved levels of trust and confidence in their ability to act in the public interest?

- Yes
- No
- Don't know

13. If yes, describe the form that these might take

Definitions of the key elements of corporate governance usually include terms such as Responsibility, Accountability, Transparency and Probity, with Effectiveness, Equity, Inclusion and observance of the Rule of Law are also often mentioned. Unfortunately, in the perception both of the public and of many specialists, the UK water industry has failed to observe these requirements in recent years: repeated fines for breaching environmental standards and accumulation of perilous levels of debt are just two examples.

Measures that could help to change the existing culture include:

- Improved internal reporting mechanisms, with staff encouraged to raise issues

- Stronger external reporting to promote transparency and accountability
- More extensive external auditing
- Wider participation in company oversight
- Stronger penalties for non-compliance

To deliver this, the water service regulator OfWat needs to become more effective. More independent monitoring of the sector's activities is needed, with stricter controls on cash flows, and dividends payable only on delivery of improvements in performance.

One further important and effective measure is to name and shame both companies and individuals for failure to meet existing well-established standards for corporate responsibility and good governance.

14. Is the current geographical configuration of companies (regional water and sewerage undertakers with various water-only companies) appropriate to managing current and future pressures on the water environment?

- Yes
- No
- Don't know

15. If no please explain why

While the fundamental principles of river basin management are sound, a review of the scale and boundaries of the existing companies is overdue. It could also help to restore public and investor confidence which has severely undermined by the current water companies' demonstrated a lack of local and regional accountability.

16. Are the current responsibilities and duties placed on water companies appropriate to managing current and future pressures on the water environment?

- Yes
- No

Don't know

17. If no please explain how these need to be changed

Companies are driven by profit, and this leads to mismanagement of resources. Profits need to be linked directly to drivers that reward environmental performance and promote adoption of long-term environmental goals. Recently, responsibility to shareholders has clearly overridden that to the public and the environment: some form of public or not-for-profit ownership would help to address this. Certain duties and responsibilities are also conflicting, or may actually restrict what the companies can do, although this is a complex issue and needs to be discussed in detail with the industry and other stakeholders.

18. Do the policies and guidance of water company planning and investment drive optimal delivery of safe and reliable, affordable water supply and sewerage services alongside healthy, resilient freshwaters?

- Yes
- No
- Don't know

19. If no, please explain why not and where / how policy and guidance might be improved

As already noted, current planning and investment drivers are too heavily influenced by commercial considerations. While water companies are effectively controlled by accountants and short term need for profits, it is difficult to see how environmental needs can be met. The current system prioritises financial criteria over environmental ones in deciding which technologies to adopt and even which projects go ahead. Underfunding of the Environment Agency in the last decade or more has also meant that water companies were almost unregulated, while the fines imposed are still derisory. Stricter oversight, stronger penalties and removal of the profit driver would be an excellent beginning in allowing the sector to re-focus.

The effectiveness of water company policies and guidance also depends on the regulatory framework in place. If this does not adequately incentivise or enforce sustainable and resilient

practices, companies will not prioritise them.

20. Do you agree that considerably more investment is needed in infrastructure (including grey, green or a combination) by water companies to achieve healthier, more resilient freshwaters?

- Yes
- No
- Don't know

21. Who should pay for this increased investment in infrastructure? Please choose one of the following.

- Water company owners / shareholders
- Customers
- A combination of owners / shareholders and customers
- Taxpayers
- Other

22. Please explain your reasoning

In the end, everything is paid for by the public, and both water supply and the water environment represent major examples of the public good. But the years since privatisation seen huge dividends paid out to shareholders and massive increases in salaries and bonuses for senior staff, while at the same time companies have presided over declining performance and increasing environmental damage. Corporate milking of cash flows is widely seen as having effectively asset-stripped the industry. Some of this clearly needs to be repaid, to signpost a major change in culture as well as to contribute to making the required investment more affordable.

23. With affordability a significant concern for many water customers, should there be a more standardised approach to supporting vulnerable customers who find it difficult to pay larger water bills (such as a single social tariff) than the current situation in which individual companies determine their own approach to providing such support?

- Yes
- No
- Don't know

24. Please explain your answer

Basic access to water services at the level needed for health, wellbeing and environmental protection should be available to all citizens. Possible mechanisms have been extensively discussed by economists and others and many ideas have been put forward: one popular view is a fixed 'social' tariff that guarantees a minimum provision, with higher rates for excessive consumption. It should be noted, however, that this support does not necessarily need to come from water pricing: such an approach can distribute costs unfairly to others who may themselves only just be able to meet their bills. Funding from general taxation may thus be preferable. Payment for water services on a metered basis also has some advantages, as it ensures that users are valued and encourages reductions in wastage.

25. Would you like to answer questions about the role of agricultural land management?

- Yes, go to the agricultural land management section.
- No, skip the agricultural land management section and go to urban pollution management.
- No, skip the agricultural land management and urban pollution management sections and go to the conclusion.

## Agricultural land management

26. The majority of land in the UK is privately owned, and the majority of that land is used for agriculture. What scope do you feel there is for land management to deliver beneficial outcomes for the freshwater environment?

	None	Little	Some	A lot	Considerable
What scope?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

27. What beneficial outcomes do you think the agriculture sector is in a position to deliver for freshwater environment? Please provide as many examples as you wish.

The economics of modern agriculture mean that animal husbandry units are getting bigger, leading to production of large quantities of organic wastes on single sites. There is also a tendency for these sites to cluster in particular regions, causing nutrient overload in the associated catchments. Poor soil and nutrient planning / use in the arable sector also contribute to water quality degradation. Better regulation and control at the catchment level to reduce this issue would be a major potential benefit from agriculture to the freshwater environment.

28. Do you agree with the policy principle, established further to Brexit, of payment of 'public money for public goods' including environmental outcomes through Environmental Land Management Schemes (ELMS)?

- Yes
- No
- Don't know

29. If no please explain why.

The question is poorly phrased, making it difficult to answer. Is intended to establish whether we agree that it is a good idea to spend public money on public goods; and/or that this principle was established further to Brexit; and/or that we agree with ELMS? These points may all have different answers.

30. Do you consider that the current development of ELMS or SFS is progressing in a way which will effectively deliver for healthy freshwaters whilst enabling farmers and land managers to operate sustainable food production businesses?

- Yes
- No
- Don't know

31. If no please explain why and how you feel the approach should be changed.

Schemes of this type are inevitably subject to multiple issues including complexity, accessibility and ambition versus budget. ELMS and SFS are no exception. One key question is payment by actions rather than outcomes. While it is unrealistic to expect all farm businesses to be motivated by environmental concerns, payment for actions encourages gaming of the system to maximise financial benefits. Such schemes also tend to favour large players against smaller ones. Addressing both food production and environmental needs is hugely challenging and cannot



easily be achieved within the UK's farming systems: but while the principles have attracted considerable support, there is a concerning lack of progress.

- No
- Don't know

32. How do you consider farmers and land managers might be most effectively supported to deliver beneficial outcomes for the freshwater environment (please give up to three priorities)?

- Payment for public good actions that improve water quality through ELMS or SFS
- Increased regulation
- Increased enforcement of existing regulation
- Increased provision of advice and guidance
- Targeted support and advice in areas where water is under particular pressure
- Targeted support for specific approaches (e.g. regenerative agriculture)
- Other

33. Should farmers and land managers work together with water companies more extensively to deliver water outcomes?

- Yes
- No
- Don't know

34. Would you be willing to enter into a private contract to provide water improvements through land management actions?

- Yes

35. Is regulatory enforcement of farming and land management practice sufficiently robust?

- Yes
- No
- Don't know

36. Please explain your answer:

As an example, it is only necessary to look at the case of the River Wye - and unfortunately this is only one of many similar cases

37. There is growing emphasis on regenerative farming including as a means to improve soil health and water infiltration. Do you consider that government policy should strongly incentivise this approach?

- Yes
- No
- Don't know

38. Please explain your answer:

While the concept is laudable, in view of the widely-demonstrated difficulties in ensuring effective implementation and monitoring of such policy initiatives, more information is needed on the proposed mechanisms

39. Would you like to answer questions about the role of urban pollution management?

- Yes, go to the urban pollution management section.
- No, skip the urban pollution management sections and go to the conclusion.

### Urban diffuse pollution

40. Do you consider that runoff water from roads is well-managed?

- Yes
- No
- Don't know

41. If no, please explain why.

We suffer from a legacy of combined sewer systems which makes it difficult to deal with road run-off, especially in view of the increasing likelihood of extreme rainfall events due to climate change. That does not excuse the lack of prioritisation of this issue, until recent increases in public awareness. There is an urgent need to implement measures for the reduction of Combined Sewer Overflows (CSO) to prevent untreated sewage from entering water bodies during heavy rainfall events.

Modern motorway runoff is in general relatively well managed.

42. Do you consider that runoff water from other urban hard surfaces (such as roofs or car parks) is well-managed?

- Yes
- No
- Don't know

43. If no, please explain why.

Far too little emphasis or expenditure on sustainable urban drainage approaches, as is evident from increasing incidences of surface water flooding associated with both urbanisation of catchments and changing rainfall patterns. The performance of local planning agencies and regulations has been particularly dire in this respect. More needs to be done to separate runoff from hard surfaces from our foul drainage systems. More retrofitting of soak aways/short term storage solutions also needs to be implemented to reduce flooding. This should be carried out in conjunction with groundwater recharge. Opportunities for more sustainable urban planning include:

- Integrating green spaces, parks, and permeable surfaces into urban planning to absorb rainwater, reduce runoff, and filter pollutants before they reach water bodies.
- Mandating the use of SuDS in new developments and retrofit existing ones to manage stormwater runoff more effectively, preventing pollutants from entering rivers and streams.
- Implementing clear boundaries to limit urban sprawl and encourage compact, efficient development to allow effective management of runoff from impermeable surfaces.
- Promoting mixed-use developments to reduce the need for extensive car travel and thus minimise the pollution of water bodies from vehicle emissions and runoff.

44. Who do you consider has the greatest influence and responsibility for managing urban runoff pollution (please provide up to three priorities)?

- Central government, Ministers and departments
- Government agencies
- Environmental regulators

## Conclusion

Finally, is there anything we've missed?

### 48. Please tell us anything about anything you feel is important to A Fresh Water Future that you haven't had the chance to already.

Greater investment is essential, but this can only happen with a change of attitude from Government and from senior management in the sector.

We are likely to see significant investment in nature-based solutions to manage surface water flows (and possibly to treat wastewater). There is a concern, however, that these will be installed but not adequately monitored and maintained, and will thus fail, leaving us to discover the extent of the issue some years or decades later. Monitoring and maintenance are at the heart of any move towards sustainable solutions for the water environment.

Very little attention has been given to the concept of 'right water, right place' – i.e. water reuse. This could help to reduce the pressure on many points in the system.

Water quantity is becoming as important as water quality. Does it make more strategic sense to continue to develop in south-east England and transfer water from the north west – or to develop other parts of the country where water may be less of a constraint? The responses above represent a summary of the Environmental Biotechnology Network's views on the survey questions. While there was generally strong consensus regarding the top two of any "Choose three..." items, the third showed some variability: for example, 'Water abstraction for public water supply', 'Population growth / demographic change' and 'Climate change' were all suggested as important factors. All three are linked to quantity as well as quality and also illustrate the huge scale of effort needed to hold and reverse our impacts on the freshwater environment.

This content is created by the owner of the form. The data you submit will be sent to the form owner. Microsoft is not responsible for the privacy or security practices of its customers, including those of this form owner. Never give out your password.

Powered by Microsoft Forms |

The owner of this form has not provided a privacy statement as to how they will use your response data. Do not provide personal or sensitive information.

| [Terms of use](#)