Reporting and Environmental Performance Assessment (EPA) review for water and sewerage companies 2026-2030

About you

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Water Industry National Environment Programme (WINEP) scheme delivery

Q21. Do you agree to continue with the Water Industry National Environment Programme (WINEP) delivery metric cumulative reporting approach?
No

Q22. Please provide any comments on Question 21 if required.
It is very hard to form a judgement in the absence of seeing the WINEP and the PR24 final determination - and we would urge further consultation once this detail is available. But from what we have seen the WINEP is excessively focused towards concrete and chemical solutions and does not allow much if any flexibility over the next 5 years for moving towards nature based approaches (though use of SUDs is less inhibited) as evidence grows. As such it also involves an unacceptable Carbon footprint. We are very concerned that the EPA metric will 'double down' on these concrete/chemical solutions so, unless the WINEP explicitly allows for significantly greater flexibility within the 5 year period, we would not support its inclusion as part of the EPA: there are other regulatory tools which the EA can already use.

Supply Demand Balance Index (SDBI)

Q27. Please provide your views on any changes to the SDBI metric and process that you believe are required for the next EPA reporting period (2026/2027 to 2030/2031).

There seems no case for confining this metric to the water and sewage companies: the inclusion of WOCs seems to us essential, particularly since the WOCs operate in the most water stressed areas of the country, and cover many of the chalk streams.

Descriptive permit compliance at numeric sites

Q40. Do you agree with the definitions of what would be classed as a descriptive metric failure?

Yes

Q41. Please provide any comments on Question 40 if required.

We agreed with Blueprint for Water that the proposed exclusions are welcome, noting that their inclusion in the metric would act as a drag upon innovation, as companies would not wish to risk permit breaches and therefore would be dissuaded from opting for more complex or uncertain approaches, in exactly the areas where innovation will be key to ensuring future ambition can be met in an affordable way. This includes areas in which it can be particularly challenging to find effective and cost-efficient approaches (e.g. chemicals), and where high ambition could otherwise see a focus on costly and carbon-intensive measures in order to meet legislative targets, but where alternative approaches have the potential to enable the sector to meet these requirements in ways which are most cost-beneficial, both in terms of cost impacts upon customers and in terms of wider benefits delivery (e.g. nutrient load reduction through Catchment Nutrient Balancing and Integrated Constructed Wetlands).

Storm Overflows

Q44. Do you agree with the definitions of what would be classed as a storm overflow failure for this metric?

No

Q45. Please provide any comments on Question 44 if required.

We accept the political and public need for something on storm overflows. However we need a measure which relates more directly to related environmental harm, rather than to the monitoring of spills.
Furthermore, and storm overflows metrics should not penalise delivery which falls short of proposed timetables due to a switch from ‘grey’ to ‘green’ measures to attenuate water or treat outflows. Whilst any change of plan is liable to cause delays, changes from traditional to nature-based solutions are particularly liable to do so because of the need for site-specific designs and the need to engage with local landowners and communities; delivery delayed for this reason should be excluded from any metric so that companies are not dissuaded from switching to greener approaches (which may also be cheaper for customers). Indeed an alternative metric could be the proportion of schemes delivered each year classed as ‘green’ or hybrid.
We are also concerned that there is very significant double counting between this metric and the proposed WINEP metrics.

Phosphorous load reduction

Q62. Do you agree with the proposed metric?

No

Q63. Please provide any comments on Question 62 if required.

From the outline definition, it is unclear whether the proposed metric will:
1. Assess P emissions relative to the flow volume of the recipient waterbody, or
2. Assess gross P released into the environment across each WaSC's operating region.
We urge the adoption of the first approach, since ecological impacts will vary strongly according to the capacity of the receiving water to dilute emitted phosphorus.
Similarly, the metric could seek to drive prioritisation based on environmental need. For example, rather than counting all load reductions, the metric could include only those delivered in or upstream of waterbodies failing WFD or CSMG phosphate thresholds.
Adopting this kind of approach would promote greater progress on Environment Act species recovery targets, as well as the P target

Reasons for Not Achieving Good Status (RNAGs)

Q64. Do you agree with the proposed metric?

Yes

Q65. Please provide any comments on Question 64 if required.

Inclusion of RNAGs is a key metric that will encourage the sector to focus on the pressures for which it is responsible which are confirmed as having an impact on the water environment. Whilst there will be overlap with other metrics including WINEP delivery, this is a key metric for helping customers to understand the full range and scale of the pressures for which companies are responsible and their efforts in tackling them. It could help to resolve the disparity in public discourse around water pollution and could in time become the headline metric for the EPA. Initially, discussion in the narrative would allow communication of issues that are receiving little public attention but which drive a big portion of investment (for example, upgrades to wastewater treatment works), helping the public to understand what it is that investment is delivering for the environment.

Future Reporting (2031 onwards) - Water Resources Demand Metric

Q86. Do you feel that the inclusion of a metric in the Environmental Performance Assessment (EPA) to assess performance against distribution input, leakage, and per capita consumption (PCC) would be effective in measuring water company performance?

Yes

Q87. Please provide any comments on Question 86 if required.

A metric which highlights progress against these key components of water supply resilience will provide a greater level of scrutiny on these key supply-side aspects, complementing the supply-demand balance index.
In addition, as discussed under Q27, the inclusion of WOCs within the EPA should be achieved as soon as possible.

Additional Comments

Q90. File Upload box:
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