

Wildlife & Countryside Link
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Steve Reed OBE MP
Secretary of State for Environment, Food & Rural Affairs
Department for Environment, Food & Rural Affairs
2 Marsham Street
London SW1P 4DF

By email

22nd July 2024

Immediate action needed to restore the water environment

Dear Secretary of State,

Congratulations on your appointment to lead the Department for Environment, Food and Rural Affairs.

We write to introduce ourselves as Blueprint for Water, an environmental coalition group of over 20 organisations working for the protection and restoration of England's water habitats, part of [Wildlife and Countryside Link](#). We stand ready to help you implement your welcome manifesto promises on water pollution, and to enable environmental recovery across water habitats.

There are three immediate opportunities for your Government to take meaningful action to address the poor state of our waters, and bring us back on track to achieve the 2027 Water Framework Directive target.

Firstly, by 9th August, your Government must respond to the Office for Environmental Protection regarding [their review of](#) the Water Framework Directive.¹ The OEP are clear in their report; the WFD regulations are vital to the health and protection of our waters, but this is being undermined by critical failures to implement them properly.

We urge you to adopt the recommendations of the OEP to address this implementation gap, and offer our assistance in their delivery:

- Ensure that the measures within River Basin Management Plans are specific, time-bound, and adequately funded to deliver their objectives. This should include the implementation of specific physical and regulatory actions, as well as the development of necessary enabling policy measures and funding mechanisms. Measures must be specific to the needs of the catchment.
- Develop and implement a coherent monitoring and evaluation framework for the state of the water environment, and progress on measures to improve it. This must clearly relate local and catchment monitoring to monitoring and evaluation of national targets, such as the Environmental Improvement Plan.
- Extend the reach and funding of the Catchment-Based Approach (CaBA) partnerships, so that they can support implementation. Catchment plans should inform measures within RBMPs, to ensure these are specific to the needs of the catchment, and CaBA partnerships must have sufficient funding and support to implement them.

Secondly, Ofwat has now published its Draft Determination of water company business plans for 2025-2030. These will be finalised around December 2024.

2025-2030 is a critical timeframe for nature, including legal deadlines to restore waters to good health by 2027, for 30% of land and sea to be protected for nature's recovery, and to halt the decline of species by 2030. The water sector will play a crucial role in the success, or failure, of these targets.

It is essential that company plans deliver the necessary investment and action to ensure that water supply and wastewater systems are fit for purpose, both now and in future. This must include tackling storm overflows, stopping unsustainable abstraction, and helping homeowners and businesses to reduce water demand.

¹ Our briefing on the Water Framework Directive is enclosed with this letter. It can also be found on our website [here](#).

We urge you to take immediate action to ensure that these critical business plans deliver maximum environmental and social benefit by:

- Introducing a strong new [Green Duty for Ofwat](#). This would require Ofwat to take all proportionate steps towards the achievement of Environment Act targets, ensuring that investment decisions are made to deliver the best environmental outcomes. This Green Duty would give Ofwat the mandate it needs to implement the most robust possible sanctions on polluting water companies, such as preventing polluting companies from paying dividends to shareholders. A Green Duty would [complement and strengthen](#), and could be delivered through, the Water (Special Measures) Bill.
- Issuing stronger direction to Ofwat and the Environment Agency to facilitate the uptake and use [of nature-based solutions](#), such as treatment wetlands, via a 'nature first' commitment. Nature-based solutions are often cheaper than traditional concrete-based approaches, delivering multiple benefits for people and wildlife. They also create opportunities for blended finance, further increasing taxpayer value for money.

Finally, it is evident that the current approach to water management is failing. Regulations are undermined by loss of funding and poor implementation, monitoring and enforcement, as pressures on the water environment are only increasing due to climate change and historic underinvestment.

We urge your Government to commission [a comprehensive, independent review](#) of the management and regulation of water, to report within the first 12 months. This should consider fundamental questions including the capacity and competency of regulators, how to better implement and improve WFD and catchment management, and unlocking regulatory barriers to the use of [nature-based solutions](#). This should then inform a programme of improvement for our waters that will unlock sustainable growth and productivity alongside nature recovery, helping to achieve both the 2027 Water Framework Directive target and the 2030 Environment Act species abundance target.

Thank you for your consideration of these recommendations, which could be delivered as a comprehensive package of reforms through a dedicated piece of primary legislation. We would be delighted to meet with you and discuss this possibility in greater detail, and to offer our support in progressing our shared goal of recovering the health of water habitats.

Yours sincerely,



Ali Morse
Water Policy Manager, The Wildlife Trusts
Chair, Blueprint for Water

This letter is supported by the following organisations:

Angling Trust
Bat Conservation Trust
Beaver Trust
Freshwater Habitats Trust
Friends of the Earth
Froglife
Institute of Fisheries Management
Marine Conservation Society
National Trust
Paddle UK
River Action
The Rivers Trust
The Wildlife Trusts
Waterwise
WWT
ZSL

CC:

Emma Hardy MP, Parliamentary Under-Secretary of State at the Department for Environment,
Food and Rural Affairs