



Angela Wallis
Water Stressed Areas Consultation
Environment Agency
Kingfisher House
Goldhay Way
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Peterborough
PE2 5ZR

17 May 2007

Dear Angela

Consultation document on areas of relative water stress

The SBWWI is an active, not-for-profit Trade Association, representing the interests of c80+ UK contractors, manufacturers, consultants, distributors and others supplying the water and wastewater companies throughout the UK. Our members provide over 95% of pipeline and metering products used by the UK water companies and contractors range from the very large Tier 1 framework partners to the smaller, specialist niche skills companies.

The views expressed in this document represent an amalgamation of the opinions of individual SBWWI members who may not necessarily agree on all issues arising from the consultation document.

SBWWI has both carefully read through the consultation and discussed the content in more detail with members, which includes the four main UK water meter manufacturers.

Q1. do you agree that some water efficiency activity is appropriate everywhere throughout England?

SBWWI would agree that some form of water efficiency activity would be appropriate everywhere throughout England, regardless of whether the area has been classified as water stressed. The Society encompasses the concept of introducing compulsory metering in areas that are designated as water stress in the first instance, but would ultimately encourage the extension of the process to include the installation of a meter in every household. Information and marketing of water efficient devices and activities could be provided to educate the consumer in those areas where water resources are not so strained.

Q2. what do you think of the principle that water efficiency measures should be in proportion to the relative degree of water stress?

It makes sense to apply water efficiency measures in proportion to the relative degree of water stress, using the correct formula to identify areas of water stress. Current household demand, increases in population and anticipated housing growth would all need to be factors that are considered, amongst others, within the calculations.

Q3. what is the right size of area for the classification of water stress?

SBWWI has no specific comments to make with regard to Q3 and would agree with the criteria contained in the consultation document.



Q4. do you agree that classifying water stress according to three levels is the right approach?

SBWWI has no specific disagreements with regard to Q4 on the EA methodology.

Q5. currently we are using Serious, Moderate and Low. What names do you think we should use to describe the levels of water stress in England?

SBWWI has no specific comment to make on the terminology used to classify the three levels, and finds this to be acceptable and easily recognisable.

Q6. can you suggest improvements to this approach for scoring and classifying water companies?

SBWWI would comment that some form of mechanism should be in place for companies to be reassessed during the 5-year period, where that company were able to provide the necessary evidence/data to do so.

Q7. do you agree that the result of this approach effectively identifies the areas of water stress in England?

SBWWI would agree with this statement.

SBWWI recognises the comprehensive nature of this Consultation and would be pleased to participate in any future similar consultations or discussions.

We look forward to receiving copies of the final document in due course.

Yours sincerely

A handwritten signature in black ink that reads 'Carol Hickman'.

Carol Hickman
Executive Director
SBWWI