

## Response ID ANON-XXU5-KH66-S

Submitted to Independent Water Commission – Call for Evidence  
Submitted on 2025-04-23 22:02:08

### About you

1 Would you like your response to be confidential?

No

2 If you answered yes, which information would you like to keep confidential and why?

Please explain here:

3 Do you consent to being contacted by the Independent Water Commission about your response?

Yes

4 If you consented above, please provide your full name.

Answer:



6 In what capacity are you completing this Call for Evidence?

As an NGO or other non-profit public interest group

7 What is the name of the organisation or interested group that you are responding on behalf of?

Organisation:

Clean River Kent Campaign, Cumbria – volunteers from communities along the River Kent. CRKC is not allied to any political party.

8 Where do you live?

England

### Business or Organisation Location

9 Where does your business or organisation operate? (Please select all that apply)

England

### Water System Outcomes Top Priorities

10 Thinking ahead to what you would like the water system to look like in the future (e.g., in 25 years time), what outcomes from the water system are most important to you? (Please select your first priority here)

Resilience to climate change

If you selected other, please specify below:

First Priority: Resilience to Climate Change

11f To what extent do you believe the overall water framework already delivers your chosen outcome: resilience to climate change?

Very little

### Water System Outcomes: Second Priority

10b Thinking ahead to what you would like the water system to look like in the future (e.g., in 25 years time), what outcomes from the water system are most important to you? (Please select your second priority here)

Improved water environment (e.g. healthy habitats for aquatic plants and animals)

If you selected other, please specify below. Where possible, please describe the extent to which this already being done.:

## Second Priority: Improved Water Environment

11k To what extent do you believe the overall water framework already delivers your chosen outcome: an improved water environment (e.g. healthy habitats for aquatic plants and animals)?

Very little

## Water System Outcomes: Third Priority

10c Thinking ahead to what you would like the water system to look like in the future (e.g., in 25 years time), what outcomes from the water system are most important to you? (Please select your third priority here)

Water bodies being safe for swimming and other recreational uses (e.g. kayaking, paddleboarding)

If you selected other, please specify below:

## Third Priority: Safe Water Bodies for Swimming

11w To what extent do you believe the overall water framework already delivers your chosen outcome: water bodies being safe for swimming and other recreational uses (e.g. kayaking, paddleboarding)?

Not at all

## Management of Water

12 Who do you believe should be responsible for making decisions about what outcomes to prioritise from the water system?

This is not intended to be an exhaustive list. Apart from the above, please think about other bodies you consider to be relevant. :

The water industry should be regarded as a 'sovereign industry' because it is essential to national security and well-being. A country which is not in charge of its own water resources is highly vulnerable. This is especially so in the light of the climate emergency and its impact.

Therefore the UK Government, in order to provide security for the UK population, must provide compelling leadership, ensuring that decisions are made within a democratic framework and that decision makers are clearly accountable to the public.

The UK Government (not companies or regulators) should have lead responsibility for setting out the high-level strategic direction for the industry with overarching and holistic /integrated priorities (for the medium-long term). These should be regularly reviewed by Parliament.

An alternative model to the current system in England (referred to in the Commission's Call for Evidence document at paragraph 198, which is consistent with Government policy on devolution) could be based on local government structures (from regional bodies to parish council level) with regional planning (based on hydrological boundaries) and local priorities and plans (based on catchment areas) being agreed by and driven through those bodies, working with partner organisations. (Where hydrological boundaries are not coterminous with administrative ones, there would need to be arrangements for cross-regional cooperation.) This model provides an example of a water management system which would enable (at least) public control, with public/customer representation in decision-making public accountability for delivery.

The byzantine system of regulation, with Ofwat at its centre, is arguably an inevitable result of privatisation of an industry in which competition is non-existent. The system of regulation has failed. Responsibilities are split among Defra, the Environment Agency, Ofwat and the Drinking Water Inspectorate (DWI), with unresolved tensions in safeguarding ecological, financial and public health. The regulatory arrangements are over-complicated, and there is very little accountability to either customers or citizens for either regulatory priorities or performance. Owing to 'the revolving door' (between Ofwat and company personnel), lack of transparency and pressures that water companies can bring to bear on Ofwat (illustrated by permitted bonus payouts and recent hikes in water bills) public trust in Ofwat has been eroded.

13 Do you believe there should be changes to roles and responsibilities for water management across local, regional and national levels?

Changes are needed

If you selected changes are needed, please explain below. Consider how you believe roles and responsibilities should be better organised across local, regional, and national levels, including who you believe should be the lead authority at each level and why. :

To elaborate on our answer to Q12:

The principle of integrated river basin management, aligning with hydrological boundaries, should be retained and strengthened. At present there is considerable variation in the operational effectiveness of this approach. Problems can include a lack of clarity of purpose, a failure to engage relevant partners, and weak leadership and management.

Elected representatives from local government must be involved in river basin management to ensure citizen participation with proper accountability to the local community. International evidence demonstrates that citizen participation has been a crucial factor in improving water management e.g. Berlin and Paris.

At a national level the UK Government must set clear priorities and strategic outcomes with measurable and timetabled targets. As devolution proceeds, water management planning, delivering and monitoring could increasingly be undertaken at regional level.

14 Do you believe changes are needed to help reduce the siloed approach to water management across different sectors? If so, what changes do you believe would be beneficial? (Please select up to 5 options)

Government providing clearer national strategic direction and targets on water, A regional or catchment scale systems planning authority\*, Streamlining or aligning water management planning and other plans such as flood risk plans, local nature recovery strategies, and local plans for development, Aligning water management with democratic structures\*\*, Pooling together existing funding streams at a spatial level\*\*\*, Other (please specify)

If you selected other, please specify below:

The water management system must be accountable through our existing and future democratic structures – national, local and, as devolution proceeds, increasingly regional.

It will be essential to fundamentally review the regulatory requirements of this new system. It is very clear that the present arrangements don't work, and require rigorous rethinking. Simply tweaking them, as implied in the question above will not suffice. Moreover, it is impossible to design a regulatory framework in isolation from the whole water management system.

15 Do you believe there are barriers to money being spent more effectively and efficiently across different sectors to deliver the best outcomes for the water system? If so, what do you believe are the key barriers? (Please select up to 3 options)

Limitations of evidence on costs and benefits (including co-benefits, such as wider environmental or ecological outcomes), Unclear targets and objectives, Limitations of alignment of existing funding pots (e.g. water company investment, agri-environment schemes, government funding for Catchment Partnerships), Planning timelines (e.g. timelines misaligned, too long, or too short), Barriers to partnership schemes (e.g. joint maintenance agreements, collaboration across sectors), Other

If you selected other, please specify below:

This question assumes that the privatisation model per se is not intrinsically wasteful. It is clear that the debt-based operating model deployed by the water companies leaches funds, which should be invested in infrastructure repair and renewal, into a combination of interest on debt, shareholder dividends and excessive salaries. Places which have moved from private to public services have seen an immediate reduction in customer bills.

16 In your opinion, is it more important that regional water system governance aligns with hydrological or local government boundaries?

Hydrological boundaries (e.g. water catchments, river basin districts)

## Management of the Water Environment

17 Do you believe changes are needed to the WFD Regulations, including for 2027 onwards? If so, which areas would benefit the most from change? (Please select all that apply)

River Basin Management Plans (e.g. spatial coverage, scope, the length of the planning cycle, the programmes of measures), The monitoring system (e.g. the evidence base, the use of technology, data sharing for monitoring, reporting), Governance and accountability (e.g. the duties of governments and organisations), Public participation and engagement (e.g. through consultations, delivery and investment planning)

18 If you feel the WFD Regulations would benefit from change, please expand on where you feel changes are necessary and the reasons why.

Please expand below:

Few people know much about the WFD Regulations, and, even for those who are interested and concerned, it can be very difficult to make use of the data which they generate. There is a real risk of drowning in huge EA spreadsheets of data, rather than being able to find relevant information and intelligence. Without this, public accountability is impossible.

The report published by the Office for Environmental Protection ('A review of implementation of the Water Framework Directive Regulations and River Basin Management in England') in 2024 summarises the problems and proposes improvements.

Although there is an increasing range of devices which can support remote monitoring, the current arrangements remain over-dependent on members of staff undertaking regular sampling on site. This limits both the breadth and depth of regular monitoring.

The recent escalating public concern about the deterioration in our rivers, lakes and seas has resulted in local citizens learning more about these data, as well as becoming involved in citizen science programmes. It should be an early priority to improve public access to and understanding of the information available about our seas and inland waterways. This is crucial to achieving effective citizen participation in the future of water management.

## Measuring and Assessing the Water Environment

19 Do you believe changes are needed to improve how we monitor and report on the health of the water environment? If so, what changes do you believe could lead to improvements? (Please select all that apply)

Reporting on wider outcomes than ecological status (e.g. public health), Use of citizen science, Data sharing platforms for government and third-party evidence/data, Expanding out from the water body level to report on a whole catchment, Full or partial integration with wider environmental/water monitoring, Other (please specify)

If you selected other, please specify below:

The WFD Regulations generate valuable data. However, the value of the data is limited by the dearth of analysis and interpretation. This causes severe problems not only for decision makers, but also for local communities who wish to participate in improving the health of their local water body.

There are poor links to citizen science. The usual excuse for this is doubts about the scientific validity of citizen science. However, with expert advice on study design, training and support, and shared expertise in analysing and interpreting results, the commitment of the many citizen scientists now active in water health could be harnessed to extend monitoring capacity and enable citizen participation.

The National Engineering Policy Centre and Royal Academy of Engineering published Testing the Waters: Priorities for mitigating health risks from wastewater pollution in 2024. In a Foreword the Chief Medical Officer for England is very critical of the lack of focus on public health. Local activists have had to resort to raising funds to support applications for bathing water status as the only way to secure testing of stretches of water used for water-based leisure for E. coli, a potentially fatal infection.

Evidence is also building of the presence of chemicals and microplastics, posing a risk to both human and ecological health, as well as pharmaceuticals and pollutants from road drainage as well as industrial sources. These substances are not all monitored systematically.

## Strategic Direction for the Water Industry

### 20 What role do you believe the government can play in providing strategic direction for the water industry?

By 'strategic direction' we mean, for example: the Strategic Policy Statement / the Strategic Priorities and Objectives Statement; Government targets (e.g. in the Environment Act 2021 and the Plan for Water in England only); the Price Review Forum (Wales only). This is not an exhaustive list. Please answer below. :

For a sovereign industry and monopoly provider, UK Government leadership is crucial – the water companies and their regulators need to be held to account for delivering priority outcomes and strategic direction.

This should make it clear to the water companies what is expected of them, and equally clear to customers and citizens what we can expect and what the water companies are accountable for delivering.

At present it is hard to identify the democratically agreed priorities. UK Government documents have been published but tend to comprise long lists of actions with few measurable outcomes or timescales – 'as soon as is practicable' is not a great help. Even if these actions were all completed, it is impossible to predict to what extent water management in England would have improved - or indeed whether some aspects might have worsened. Thus although the public has become increasingly concerned about the state of water management in England over the last few years, it is difficult for even the most determined to understand exactly what HM Government expects the water industry and its regulators to achieve and what they should prioritise.

There is no coherent statement of priorities and outcomes for the next 5, 10, 25 and 50 years or of the investment required to achieve these. Water industry funding is agreed on a 5 yearly cycle, with decisions being published a mere 3 months before the next 5 year period starts. This seems inappropriate in a sector which involves complex planning decisions and major infrastructure investment, and which is crucial for national security. The potential impact of climate change makes this short term 'action planning' not only inefficient but dangerous. Only the UK Government can achieve the step change needed to protect the population.

Under a model of public ownership, Government would have a leading and clearer role in providing strategic direction and, arguably, many of the current inefficiencies and blockages in planning and regulatory processes would fall away.

### 21 What changes, if any, should be made to how the government provides strategic direction for the water industry?

Changes are needed

If you selected that changes are needed, please describe what changes you feel are needed and why.:

HM Government must provide strategic direction for the water industry with:

- Specific and measurable outcomes which are evidence-based
- Defined timescales
- Long term investment plans
- Reporting frameworks
- Regular review

The UK Government has published various documents which are relevant including "Plan for Water" and "Environmental Improvement Plan", both published in 2023.

The Environmental Improvement Plan included this somewhat vague overarching goal for water: "We will achieve clean and plentiful water by improving at least 75% of our waters to be close to their natural state as soon as is practicable." The following pages listed a wide range of actions, some with money attached. The Plan for Water followed a few months later – full of worthy intent, but again little specificity and very few measurable outcomes with timescales – an inadequate response to public concern rather than a serious attempt to provide strategic direction.

The more recent focus has been regulatory, with this Commission tasked with overhauling the water sector. One aspect of this should be to provide strategic direction.

### 22 Do you believe there are barriers to effective long-term water industry planning? If so, what factors do you believe are preventing effective long-term water industry planning? (Please select all that apply)

Limited clear guidance from UK and Welsh Governments on priorities and how to manage trade-offs, Limited timebound, specific and measurable targets (e.g. for water outcomes such as water quality and water supply, or wider outcomes such as net zero, nature-based solutions, circular economy), Engagement with customers and environmental or local groups (e.g. too much engagement, too little, engagement is not meaningful, engagement is not local), Regulatory requirements don't support sufficient long-term certainty or respond well to emerging issues/policy changes

If you selected other, please specify below:

### 23 What changes, if any, would help water companies to use planning frameworks more effectively to fulfil their duties and deliver their functions?

Please answer and explain below:

The planning frameworks listed in the question tend to be very long, very detailed, and very technical. Presumably the most senior layers of water companies are familiar with these and can see how they might inform what the company itself needs to do as well as enable partners to understand how they can work with them. But how many people have the luxury of time to read so many words, and the expertise and experience to understand complex material which crosses a number of knowledge domains?

Water companies should be required to spell out in simple language their short and longer-term priorities and the level of investment required for strategic investment and short-term repair and maintenance. They should set out their programme for the next 10 years (further ahead for major infrastructure projects), indicating where partnerships will be crucial. And their outcomes should include the impact on human health, biodiversity and ecological health.

This summary would enable their own staff, their partners, customers and citizens to have a better understanding of everyone's role in achieving this. And importantly (assuming there is no fundamental change to the status quo), through citizen participation and growing the consumer voice, begin to build new and more productive relationships between people and their 'sovereign industry'.

## The Regulators

24 How would you rate the performance of the water regulatory framework?

Performing very poorly

25 To what extent do water regulators coordinate effectively in the regulation of the water industry?

Not at all

26 What changes, if any, do you consider are needed to the framework of water regulators to improve the regulation of the water industry? Please consider both potential benefits and costs of any proposed changes.

Please answer and explain below, providing supporting examples or evidence, where possible:

A change in the regulatory framework cannot by itself solve the underlying problem which is baked into the private ownership model itself. Water should be a publicly owned utility, not a private business run for the benefit of international shareholders.

In our experience, this underlying problem is compounded by:

- Too many regulators – system much too complicated
- Inherent tension between EA and Ofwat
- EA is drowning in data but lacks capacity to analyse and interpret the data
- The regulatory framework is unintelligible to most people
- The Ofwat PR exercise requires extremely lengthy documentation including technical terminology and complicated analysis, which is difficult for those without accounting experience to understand
- Ofwat has focused almost exclusively on keeping customer bills low until PR24. Perversely, the regime has allowed the companies to pay out excessive dividends, amass debt and under-invest (see Lobina and Hall (2024) Clean Water: A Case for Public Ownership, pp 12-13.)

27 To what extent do you think the water industry regulators have the capacity, capabilities and skills required to effectively perform their roles?

Please provide information to support your views on the capacity and capability of regulators, including, where possible, supporting evidence and examples :

We are unable to comment on capacity, capabilities and skills.

However, there is documented concern that the independence of Ofwat is jeopardised and public trust is undermined by 'the revolving door' whereby staff move from water companies to Ofwat and vice versa. While this means expertise in the industry is available to Ofwat, it may discourage independent challenge and a sufficient degree of distance from companies' senior management and perhaps investors.

We are also unable to comment on whether or not the regulators are under-resourced. However, we are aware that austerity measures have impacted on the EA's resources. Also, the EA does not appear to have deployed the resources required to be an effective environmental regulator e.g. they seem to lack analytical and interpretative capabilities. We have experienced their organisation as unhelpfully siloed, and it is not always easy to engage with them even, for example, about citizen science.

In our view it is only because of the persistence of a small number of dedicated citizen scientists around the country and very effective campaigners that the longstanding failures of the water industry have finally achieved political priority.

## Economic Regulation

28 To what extent do you think the economic regulatory framework is delivering positive outcomes?

Not Answered

29 How do you think the Price Review process should balance the need to keep customer bills low with the need for infrastructure resilience? (Infrastructure resilience is the ability of an organisation's infrastructure, and the skills to run that infrastructure, to avoid, cope with, and recover from disruption in its performance)

Please answer and explain below, providing supporting examples or evidence, where possible:

30 What, if any, changes could be made to the Price Review process to better enable the water industry to deliver positive outcomes?

Please answer and explain below, providing supporting examples or evidence, where possible:

31 What, if any, changes could be made to the Price Review process on assessing and setting base expenditure to effectively support infrastructure maintenance?

Please answer and explain below, providing supporting examples or evidence, where possible:

32 What, if any, changes could be made to the Price Review process on assessing and setting enhancement expenditure to effectively support infrastructure improvements?

Please answer and explain below, providing supporting examples or evidence, where possible.:

33 What, if any, changes could be made to the Price Review Process on assessing and setting the Weighted Average Cost of Capital (WACC) to effectively attract investment in the water industry?

Please answer and explain below, providing supporting examples or evidence, where possible.:

34 What, if any, changes could be made to the Price Review process on assessing and setting performance incentives to effectively secure infrastructure delivery? This could be across Outcome Delivery Incentives (ODIs) to effectively deliver for customers, the environment and public health; and/or across Price Control Deliverables (PCDs), for example

Please answer and explain below, providing supporting examples or evidence, where possible.:

## Customer Bills

35 To what extent does the economic regulatory framework deliver acceptable water bills for customers?

Very little

36 What, if any, changes would help ensure customers are paying fairly for the water they use? (Please select all that apply)

Other (please specify)

If you selected other, please specify below:

The way this is phrased makes it a difficult question to answer. We all like low bills, which Ofwat delivered until very recently. However, the downside of this was that there were insufficient funds to maintain let alone improve water and wastewater management. This is an example of poor customer engagement, with a failure on the part of the water industry and its regulators to explain to customers why a modest annual increase, in line with inflation, is likely to be required. Was this because they were reluctant to disclose the financial model deployed by the water companies and condoned (or indeed encouraged?) by Ofwat? The sudden increase from April 2025, against the backdrop of failing services and growing public anger about companies' diversion of income into dividends and bonuses, has generated a significant level of mistrust, which needs to be addressed by reform of water management system. Customers would be more likely to perceive that they were paying 'fairly' for water if the sector operated on a non-profit basis.

## Customer Protections

37 To what extent does the regulatory framework protect customers from poor service?

Not at all

38 To what extent does the regulatory framework ensure that vulnerable customers are effectively supported?

To some extent

39 What, if any, changes to the regulatory framework would better incentivise water companies to deliver and maintain high customer standards? (Please select all that apply)

Ensure customer matters are investigated and, where necessary, enforcement action taken, Greater accountability for water companies' handling of complaints, Other (please specify)

If you selected other, please specify below:

The customer voice is very weak in this utility. The Consumer Council for Water is extremely quiet, and again reflects the revolving door of staff moving between the water companies, Ofwat and the CCW. Its website is out of date. Despite the growing public concern about water management, it seems to have remained almost silent, rarely present in the extensive discussions in the public domain over recent years. It's not clear what it's for, really. Investigations (whether by water companies or by EA or DWI) must be prompt and thorough. Updates should be provided (taking account of the need for confidentiality in some circumstances) and the outcomes should be published and publicised, with actions followed through.

40 What, if any, changes to the regulatory framework would improve support for customers in vulnerable circumstances? (Please select all that apply)

Introduce a single social tariff for England and Wales, Ensure a proactive approach by water companies in identifying customers eligible for additional support, Other (please specify)

If you selected other, please specify below:

There should be a consistent single social tariff across England. Charities such as Citizens Advice should play a leadership role in a public consultation on the tariff itself and on eligibility.

Water companies should be required to be proactive in identifying eligible customers. The level of uptake should be a both a target and a performance indicator.

## Financial Resilience

41 To what extent is change required to the economic regulatory framework to support water companies' financial resilience?

Not Answered

42 Which of the following changes to the economic regulatory framework, if any, would improve outcomes for the water industry? (Please select all that apply)

If you selected other, please specify below:

43 Do you think there is evidence on the historical relationship between debt, dividends, and expenditure at water companies that the commission should be looking at?

Please answer and explain below, providing supporting examples and evidence, where possible.:

## Investment

44 To what extent does the economic regulatory framework support or hinder investment into the sector?

Not Answered

45 How do financial returns in the water sector compare to other similar sectors (for example, energy)?

Please answer and explain below, providing supporting examples or evidence, where possible.:

46 What options, if any, would incentivise investment in the water sector?

Please answer and explain below, providing supporting examples or evidence, where possible.:

47 How does the public and political portrayal of water companies in the media and elsewhere affect the attractiveness of the water sector to investors?

Not Answered

If you selected other, please specify below:

## Competition

48 To what extent should further competition in the water industry be encouraged through regulation?

Please answer below and provide evidence and examples, where possible:

In our view competition is not the answer to the woes of the water industry. As stated in earlier answers, regulation has also failed.

What is required is explicit public accountability through the most appropriate democratic structures, engagement with elected representatives, citizens and activists, and a very much stronger consumer voice.

49 Which of the following schemes, if any, have failed to provide effective levels of competition and efficiency? (Please select all that apply)

50 Which of the following changes to competition schemes, if any, would improve outcomes for the sector? (Please select all that apply)

Other (please specify)

If you selected other, please specify below:

See our answer to Q48.

51 To what extent would greater market tendering of infrastructure delivery projects improve outcomes?

Please answer and explain below, providing evidence and examples, where possible:

## Water Industry Public Policy Outcomes

52 Do you believe that legal and/or regulatory requirements would benefit from review or consolidation?

Please answer and explain below, providing evidence and examples, where possible:

We believe that the legal and regulatory requirements would benefit from clarification, explanation and promulgation. The public are deeply concerned about the state of water management in England, and many people have given up their time to raise their concerns, press for improvements and take action.

At the same time, as the Office for Environmental Protection has pointed out, it is very difficult for the average person with limited time and resources to understand exactly what is required of either the water industry or its regulators. Citizen participation is inevitably limited by this.

We are uncertain of the extent to which a review is required but would endorse the value of consolidating the requirements into one place, which is accessible and provides both interpretation and signposting so that customers become active consumers, and citizens are able to participate through innovative approaches which build on the successes in other domains of Citizens' Assemblies.

## Protecting the Environment

53 Do you believe that the system of environmental regulation, monitoring and enforcement is ensuring water company compliance with environmental standards?

Very little

54 Which of the following changes to water industry environmental regulatory requirements, if any, would improve outcomes from the sector? (Please select all that apply)

Other (please specify)

If you selected other, please specify below:

We propose that this be tackled through two strands of work:

- Identify the environmental regulatory requirements which are not currently being met and prioritise action to ensure that the water industry is compliant, using enforcement action if required.
- Also identify current and emerging threats which may require legislative reforms e.g. the impact of climate change (which requires long term infrastructure investment) and the need to address increasing public health concerns with the growing evidence of sources of infection, chemicals, pharmaceutical and microplastics in our water bodies.

55 Which of the following changes to the water industry environmental regulation, monitoring and enforcement framework, if any, would improve outcomes for the sector? (Please select all that apply)

Enhanced monitoring, including reform of operator self-monitoring, Expanded use of inspections and audits, Swifter enforcement, Other (please specify)

If you selected other, please specify below:

A serious incident occurred in the River Kent in July 2021 yet the investigation remains unfinished almost 4 years on. Proposed action:

Adopt new technology to increase the frequency and accuracy of monitoring.

Improve management of incidents:

- Assume there may be a problem and it may be significant
- Make all necessary observations; collect the relevant samples immediately
- Maintain a register of incidents under investigation
- Recognise the requirements of investigations which may result in legal action
- Peer review as well as audit incident reports and action taken to improve practice.

## Delivering Clean Drinking Water

56 What changes, if any, could be made to the drinking water regulatory system to maintain world leading drinking water quality? (Please select all that apply)

If you selected other, please specify below:

## Securing Resilient Water Supply

57 To what extent is the overall water regulatory framework securing resilient long-term supplies of water?

To some extent



58 What changes, if any, could be made to the overall water regulatory framework to ensure it can secure a resilient long-term supply of water? (Please select all that apply)

Other (please specify)

If you selected other, or want to provide additional views, please specify below:

We are not in a position to provide a comprehensive answer to this question but would make the following points:

- In our experience we are not convinced that partnerships are as well developed as they need to be
- At the same time the systems do not support the long-term investment which is required to manage water better – both water supply and flood prevention

There is also an important consumer element which must be addressed. Unfortunately, this is not helped by the current mistrust of the water companies, together with their historic reluctance to engage seriously with customers and citizens.

One area for reform might include strengthening the consumer voice and promoting a genuine dialogue with local democratic bodies and elected representatives to work together to make the best use of a finite resource.

## Infrastructure and Supply Chain Resilience and Security

59 To what extent does the overall water regulatory framework support or hinder infrastructure resilience? When considering your answer, please think about future pressures including factors such as climate change and population growth.

Not Answered

60 To what extent does the overall water regulatory framework support or hinder infrastructure security? When considering your answers, please think about evolving security threats such as cyber security.

Don't know

61 To what extent does the overall water regulatory framework support or hinder effective management of supply chain risks? When considering your answers, please think about disruption in and constraints from supply chains.

Don't know

62 What changes, if any, could be made to the overall water regulatory framework to better support infrastructure resilience? (Please select all that apply)

Setting infrastructure resilience standards (for example, requiring companies to prepare for a defined level of disruption)

If you selected other, please specify below:

63 What changes, if any, could be made to the overall water regulatory framework to better support infrastructure security? (Please select all that apply)

Don't know

If you selected other, please specify below:

64 What changes, if any, could be made to the overall water regulatory framework to better manage risks from supply chains? (Please select all that apply)

Don't know

If you selected other, please specify below:

## Innovation and technology

65 To what extent does the overall water regulatory framework currently support or hinder innovation?

Don't know

66 Which of the following changes in the sector, if any, would enable innovation outcomes? (Please select all that apply)

More outcome based regulation to allow flexibility on delivery approaches

If you selected other, please specify below:

67 What opportunities, if any, do new technologies present for companies and the regulators?

Please answer and explain below, providing evidence and examples, where possible. :

## Ownership

68 What impact, if any, has consolidation of water companies had on their performance?

Please answer and explain below:

69 What impact, if any, does whether or not a water company is listed on the stock exchange have on their performance?

Please answer and explain below:

We cannot comment on the effect of listing on performance but note that United Utilities (the water company for our area) is listed. Consequently, members of the public can purchase shares and attend AGMs. This allows for at least a small measure of public accountability through (for example) asking questions of the Board at AGMs and making contact with senior executives (as CRKC supporters, as individuals, have done). In turn, these contacts have led to a more productive dialogue between Clean River Kent Campaign and UU.

70 What impact, if any, do complex company structures like Whole Business Securitisation have on water company performance?

Please answer and explain below:

71 What impact, if any, does the type of investor (for example, private equity firms, pension funds) have on water company performance?

Please answer and explain below:

We cannot comment on the impact of the type of investor on performance but would comment that in an uncertain world there is growing public concern about overseas (often private equity firms') ownership of our water. This is a reason why we stated earlier that the Government should regard water as a sovereign industry.

## Ownership (for Wales only)

72 How effective has Dŵr Cymru Welsh Water's not-for-profit model been in driving improved outcomes?

Please explain below:

73 What are the risks associated with Dŵr Cymru Welsh Water's not-for-profit model?

Please explain below: