

Climate Change, Environment and Infrastructure Committee report on storm overflows in Wales - response from Welsh Water to the Committee's recommendations – 30 May 2022



Linea
Fortran Road
St Mellons
Cardiff
CF3 0LT

Linea
Heol Fortran
Llaneirwg
Caerdydd
CF3 0LT

02920 740450
dwrcymru.com

Llyr Gruffydd MS
Chair, Climate Change, Environment and Infrastructure
Committee Welsh Parliament
Cardiff Bay
Cardiff
CF99 1SN

30th May 2022

Dear Chair,

Report on Water Quality and Sewage Discharges – response o recommendations made by the Climate Change, Environment and Rural Affairs Committee.

Further to the committee's evidence sessions and subsequent report on Water Quality and Sewage Charges, we would like to thank the Committee for its work on this important matter which is obviously of great concern to our customers. We were also grateful for the opportunity to provide evidence to the Committee, both in writing and through our virtual attendance at the committee session on 3 February 2022.

In addition to the Committee's report we have also reviewed the Minister for Climate Change's response (9 May) to the recommendations and also noted that the report will be discussed at the Senedd on 15 June. If the committee would like any further discussions with Dŵr Cymru Welsh Water ahead of the plenary session, we are more than happy to meet again or provide further information.

Whilst not all of the recommendations of the committee are targeted at Welsh Water, we have a significant role to play in ensuring improvement to river water quality throughout Wales and our operating area, which includes parts of England, most notably - in the context of the discussion relating to river water quality - in Herefordshire and the catchment of the River Wye which has been the focus of much of the public debate.

As a company that does not have shareholders and where we are not driven to maximise profit for shareholder gain, our purpose as a company (which was written into our company articles of association in 2019) is to "provide high quality and better value drinking water and environmental services, so as to enhance the well-being of our customers and the communities we serve, both now and for generations to come." To ensure that our aims of enhancing the quality of our services and achieving good value, we are committed to an evidence based approach that targets necessary investment where it will provide the greatest improvement. This remains the case with sewage discharges and river water quality.

As the Minister's response states, the most recent data from Natural Resources Wales indicates that combined storm overflows (CSOs) have been identified as a reason for not achieving Good Ecological Status in 3.7% of waterbodies across Wales with the evidence clearly stating that other factors are having a far bigger

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impact (agriculture, abandoned mines, roads etc). Therefore, tackling CSOs alone will not improve river water quality. Similarly, diverting much needed investment in wastewater treatment works that could improve river water quality and help reduce phosphates, could be counterproductive. However, we do recognise that more needs to and can be done to reduce the amount of discharges from CSOs. This will require co-operation with other sectors, especially local government, to reduce the amount of surface water that enters into our sewers following rainfall – a network that was not designed to deal with the challenges of climate change and increased rainfall.

We are working the River Water Quality Task Force on a roadmap that will be published in the summer and we have also increased our investment in maintaining and improving our wastewater network from £783m to £835m for this five year investment period, 2020-2025. We are also reviewing other avenues to increase funding further and are currently in discussion with regulators and government.

We also look forward to participating in the Phosphate Summit to be held at the Royal Welsh Show in July and strongly believe that bringing together all sectors that impact river water quality will be beneficial and that all sectors have an important role to play.

Below is our response to the Committee's specific recommendations for Welsh Water:

Recommendation 3:

NRW and the water companies should publish annual data and/or information on the proportion of sewage spills that are not within permit conditions, which category of pollution incidents these resulted in, and whether enforcement action was taken.

As noted in our evidence submission, the discharges from these CSOs are regulated via permits issued by our environmental regulators and we have invested over £10.5 million in installing Event Duration Monitoring (EDMs) monitors on over 99% of our CSOs. These EDMs tell us when a CSO has discharged and for how long and this is helping improve our understanding of how our assets perform and will inform our work and future investment. We publish all this data on our website <https://www.dwrcymru.com/en/our-services/wastewater/river-water-quality/combined-storm-overflows>. The annual data return that we are obligated to send to NRW and EA is also published on our website in excel format.

Recommendation 4:

NRW, water companies and other relevant stakeholders should develop enhanced monitoring arrangements with a view to better understanding the impact of sewage spills on receiving water. In taking this work forward, consideration should be given to the potential role of citizen science within enhanced arrangements.

In addition to our event and duration monitors (EDM), we are using Source Apportionment Graphical Information System (SAGIS) water quality modelling to understand the impacts of Phosphorus from all polluting sectors on the Welsh freshwater Special Areas of Conservation (SAC). This system, developed and used by regulators and the wider industry, has allowed us to build a virtual representation of the rivers, taking data inputs from different sources and sectors and identifies the proportion of phosphorus from each. The model allows us to test proposed improvements in our sewage treatment works discharges to establish their impact on water quality in the river. We have committed to sharing this work with all interested parties.

As part of our commitment to deliver against the national Storm Overflow Assessment Framework, we are undertaking investigations on circa 700 CSOs to understand any “harm” that may be caused by the operations of these overflows. As part of the CSO Roadmap action plans we are working up our actions for enhanced monitoring in AMP8 which will include undertaking the assessment element of SOAF for all CSOs that discharge over 5 times per year, compared to the 40 which is in the framework at present and river monitoring in the places where it needed most.

We recognise the role that stakeholders and community groups play in understanding the river environment. We are currently involved in the number of citizen science projects on the Wye, Usk and Teifi, as well as the Ofwat funded Catchment Monitoring Co-operative, a multi-partner collaboration to create a monitoring framework. Our experience also tells us that the data they collect can be really valuable, but the testing they undertake needs to part of a robust methodology using verified testing equipment and we are currently working on a project to understand the easiest and most reliable methods for citizen scientists to use. Longer term, an evidence portal must be in place to allow the collation of these results.

Recommendation 5:

Dŵr Cymru and Hafren Dyfrdwy should aim to report on discharges from storm overflows “within an hour of the discharge beginning” which is a requirement placed on water companies in England by the Environment Act 2021. If they cannot match this standard, they should explain why.

As noted above, we currently have EDM monitors on over 99% of our CSOs and openly reported on our website annually (the remaining <1% are currently inaccessible due to accessibility & safety constraints but we are still targeting 100% and are currently working on solutions). Later this summer, we will launch our interactive web-based overflow map covering our operating area and we will be able to report all CSO discharges within an hour of them operating by 2025. We also intend to build on and expand our bathing water CSO alert systems to community and representative groups. We currently provide a real time CSO Alert Service all year round at 30 bathing sites in Wales which provide real-time information to registered users when a CSO starts operating and when it stops. We provide this service voluntarily to beach managers, such as the Local Authority, and to Surfers Against Sewage for their Safer Seas Service website and app. Alerts are also sent to Natural Resources Wales.

In conclusion, removing all CSOs and eliminating spills could require duplication of nearly all our existing sewer network and have an estimated cost of between £9 and £14 billion (for comparison, our total investment for all our services is £1.8 billion between 2020 and 2025) and increase customer bills significantly – adding hundreds of pounds to every customer’s bill and would not significantly improve river water quality. Whilst river water quality in Wales is significantly better than rivers in England with 44% meeting Good Ecological Status compared to 14%, more needs to be done. 44% is still too low.

We are committed to playing a major role in helping more of Wales’ rivers achieve Good Ecological Status and this is a key driver in our current National Environment Programme going into the next investment period for 2025-30. We remain committed to:

- **targeted interventions to reduce phosphate levels**
- **collaborate and share learnings with other key stakeholders**

- **implement innovative plans to low carbon nature-based solutions to improve river water quality and offset the impact of development**
- **use evidence-led investment to reduce the reliance on CSOs**

Should the Committee require any further information or clarification, we are happy to provide it.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'S Wilson', with a horizontal line extending to the right.

Steve Wilson,

Managing Director, Wastewater Services, Welsh Water