



23 November 2015

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Pamela Taylor OBE
Chief Executive

Dear Matthew

Water UK response to Defra Consultation on new basic rules for farmers to tackle diffuse pollution from agriculture in England

Thank you for providing the Water Industry with the opportunity to comment on this consultation document. Water UK, as the membership association are providing high level, overarching comments. Individual companies in their responses will provide more detailed answers to the specific questions.

We welcome the recognition that controlling diffuse pollution is a complex matter and the addressing of which is of interest to water and sewerage companies with a successful resolution having a direct positive impact on costs and ultimately customers' bills.

The proposed rules as presented are straightforward and easily digestible. However, it is not currently clear how they would interact with existing requirements and any associated restrictions, this would benefit from some clarity.

We particularly welcome that the proposed rules focus on phosphorous as this has been a significant gap and their introduction will tie in neatly with the industry's NEP activities. As such we support the direction set in the consultation as establishing a clear minimum standard for all (regardless of business type).

Continued...



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The document and rules appear generally to be very 'light touch', given the scale and extent of the issue, effectively bringing together already existing 'best practices' and maybe just applying them to all farmers rather than just some farmers.

Whilst outside of the main consultation several of our members made comments in relation to how these Basic Rules might apply to water and sewerage undertakers in terms of biosolids recycling. We would welcome Defra's thoughts on this matter.

Finally in terms of the overall benefit of this work we would appreciate it if Defra could comment on how many water-bodies they anticipate would improve to good Ecological Status as a result of the implementation of these measures?

Yours sincerely

A handwritten signature in black ink that reads "J Marshall". The signature is written in a cursive style with a large, stylized initial "J".

Dr Jim Marshall

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